

PLANNING SERVICES

**TOWN & COUNTRY PLANNING (DETERMINATION BY INSPECTORS)
(INQUIRIES PROCEDURE) (ENGLAND) RULES 2000**

PROOF OF EVIDENCE

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**FOR PUBLIC INQUIRY COMMENCING ON
21st November 2017**

APPEAL SITE

Bangor Wharf, Georgiana Street, London, NW1 0QS

APPELLANT

One Housing Group

SUBJECT OF APPEAL

Appeal against London Borough of Camden's refusal of Planning Permission for the 'Demolition of all buildings on-site and new buildings of 1-6 storeys in height to include 46 residential (C3) units (18 x 1 bed, 19 x 2 bed and 9 x 3 bed) of which 30 would be market units and 16 affordable, new office (B1a) floorspace (604sqm) and associated works to highways and landscaping.'

COUNCIL REFERENCE: 2016/1117/P

PLANNING INSPECTORATE REFERENCE: APP/X5210/W/16/3165200

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I. INTRODUCTION

- i. I, Frances Madders, have prepared this Proof of Evidence for presentation at the Public Inquiry into the appeal. I hold a Bachelor of Science degree in Geography from the University of Bristol, a Bachelor of Architecture degree from the University of Nottingham, and a Master of Science degree in City Design and Social Science from the London School of Economics.
- ii. I have over fourteen years' experience working in architecture and urban design including eight years as a Development Management Senior Urban Design Officer. From 2009-2014 I was a Senior Urban Design Officer at Medway Council. Since October 2014 I have been employed as a Senior Planning (Urban Design) Officer by the London Borough of Camden.
- iii. This Proof of Evidence gives my professional view on the design issues relating to this appeal arising from the following reasons for refusal for 2016/1117/P:

Reason for Refusal 6.

*The proposed development, by virtue of its height, mass, scale and detailed design, would be detrimental to the streetscene, canalside setting and the character and appearance of the wider area while failing to either preserve or enhance the character and appearance of the Regent's Canal Conservation Area, contrary to **policies G1 (Delivery and location of growth), D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.***

- iv. I am familiar with the appeal site. The evidence that I have provided for this appeal is accurate to the best of my ability and I confirm that any professional opinions expressed are my own.

II. STRUCTURE OF EVIDENCE

- i. My evidence does not summarise the national and local planning policies and guidance relevant to the design issues raised in my assessment. These are highlighted in Section 1 of the Proof of Evidence of my colleague, Sarah Freeman, and I will refer to that proof as necessary. Neither does this proof include a summary of the character and appearance of the site and its surroundings. I consider Section 2 of the Proof of Evidence of Sarah Freeman to be consistent with my own understanding of the site and its context and see no benefit in repeating it here.
- ii. In Section 1 of this Proof of Evidence, I provide my assessment of the detailed design of the appeal proposal. In Section 2, I provide a summary of my evidence and my conclusions.
- iii. My colleague Jonathan McClue will deal with relevant planning matters within his Proof of Evidence and my colleague Sarah Freeman will address the impact of the design of the appeal proposal on the character and appearance of the Regent's Canal Conservation Area.

1.0 ASSESSMENT OF THE PROPOSALS

1.1 In this section, I set out my views on the detailed design of the appeal proposals. I consider the proposal to be of a poor design that fails to take the opportunities available for improving the character and quality of appearance of the area and, in this, it does not meet the requirements of paragraph 64 of the National Planning Policy Framework, London Plan policy 7.4 and policy D1 of the Camden Local Plan.

1.2 The appeal proposal arranges the development in a 'C' shape that presents a continuous frontage to Georgiana Street and encloses a central courtyard that is open to the canal. I believe that this layout, its essential diagram and the way that it relates to the urban structure of its surroundings, offers the potential for the appeal site to make an improved contribution to the character and quality of appearance of the area. However, I consider that the combined effect of the arrangement of the volumes of the proposed buildings and the poor resolution of their architecture means that the appeal proposal fails to fulfil this potential.

1.3 Paragraph 7.4 of the Camden Local Plan states that;

"Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings".

1.4 I agree with the view of my colleague, Sarah Freeman, expressed in paragraph 3.37 of her Proof of Evidence, that there is little evidence within the Appellants' Design and Access Statement to indicate that the proposals are informed by and respond to a thorough assessment of local context and character. I consider this a prerequisite in developing the design of a proposal that is well-integrated with its surroundings.

Georgiana Street/St Pancras Way elevation

1.5 The southern block of the appeal proposal (referred to as buildings A and B in the Appellant's Design and Access Statement) has two principal elevations; a

long elevation fronting Georgiana Street and St Pancras Way, and a narrower one facing the canal. The majority of the Georgiana Street/St Pancras Way elevation is a five-storey building with a setback sixth storey to the eastern part of it. A small portion of the building steps down to three storeys at the western edge of the site.

- 1.6 I refer to paragraphs 3.22 to 3.35 of the Proof of Evidence of my colleague, Sarah Freeman, for evidence of the harm to the surrounding context of the proposed height, scale and massing of the appeal proposal. In my view, the design of this elevation contributes to the impression of excessive massing and monolithic scale of the appeal proposal. The outline of the building, and therefore its height and breadth, is given emphasis by a frame formed of a flat, unbroken parapet line and pilasters in the same plane at either side. Whilst there are recessed balconies stacked above the ground floor entrance and some depth to the reveals to ground floor openings, the façade is not otherwise dealt with in relief. I consider that this represents a missed opportunity to use detailed design to mitigate the impact of the height and massing of a building much larger than its neighbours. I will expand on this below.
- 1.7 The façade features a series of pilasters spaced at irregular intervals relating to the pattern of openings at ground floor level. These are infilled by brick panels. Whilst the shadow shown on the elevation (drawing number 194/PL12/P3) indicates that there is a degree of relief to the pilasters, the plan exposes that the reveals are so shallow as to be almost imperceptible (see Figure 1 below, extract from Proposed First Floor Plan, Drawing no. 194/PL06/P2). The narrow proportions of the window openings and large areas of blank brickwork further contributes to the flatness of the façade.

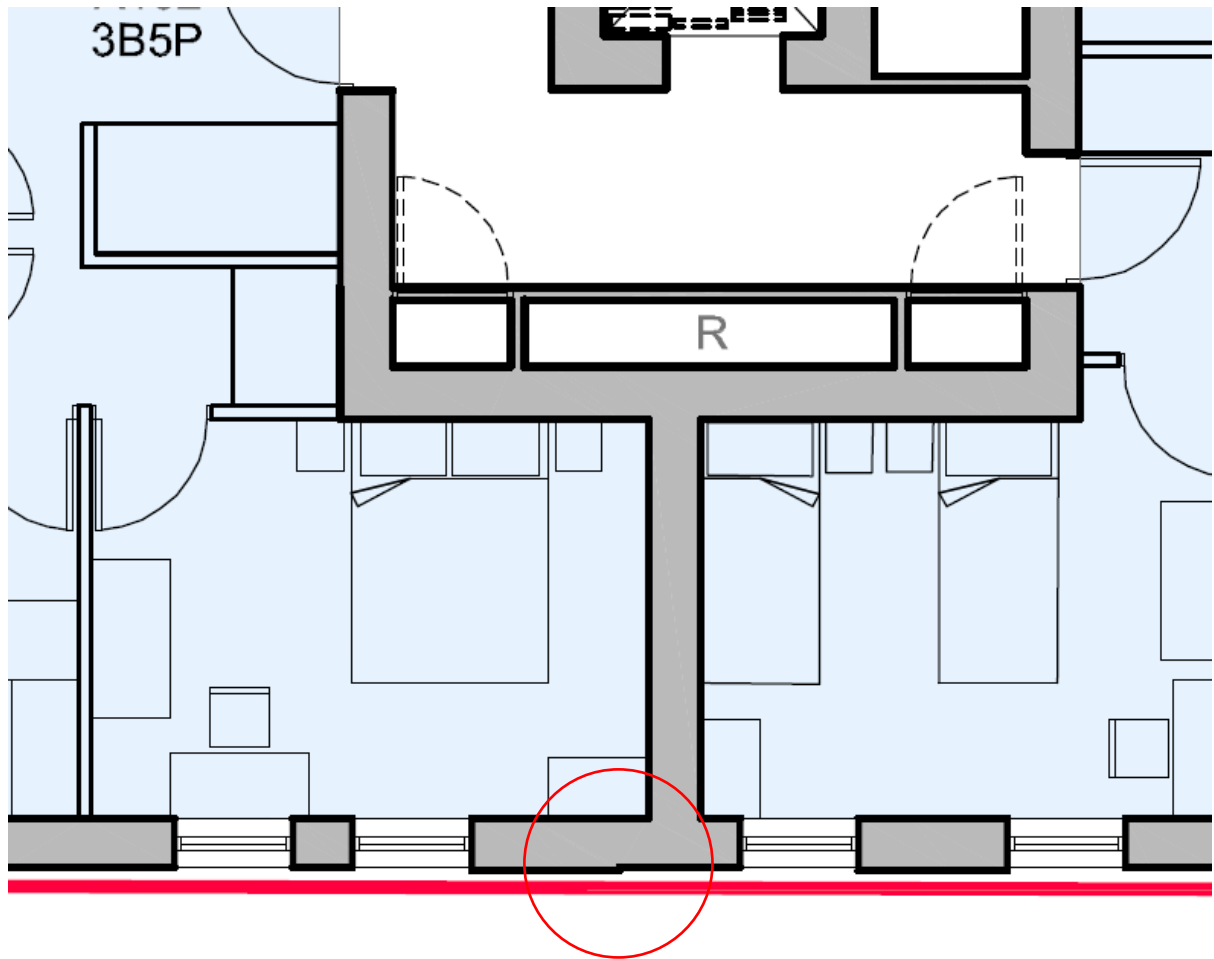


Figure 1 Extract from Proposed First Floor Plan, Drawing no. 194/PL06/P2

1.8 I consider that the design of the proposal does not take opportunities to develop a more broken massing that could help relate the larger building to the wider urban grain of the area. This could be achieved by articulating different components of the building volumetrically and developing an architectural language that expresses their difference in use and structural logic. For example, the recessed balconies over the entrance could be used to introduce a break in the massing of the building and the opportunity presented by the step down to the three-storey element to the west of the site is discussed further below.

1.9 I agree with the Heritage and Townscape Appraisal (page 36) that the southern and rear parts of 118 Royal College Street are bland and modern in appearance and 54 Georgiana Street is of no architectural quality. However, the design of the three-storey building could be better related to the scale and

finer grain of these buildings. In my view, this is not achieved because it is articulated using the same scale elements of monumental pilasters and deep parapets with infill panels as the five-storey building rather than developing a vocabulary specific to its own scale and context whilst still related to the whole.

1.10 The design of this section of the elevation also suffers in relating to the domestic scale to the west of the site because of the large ground floor openings filled with louvered panels and doors. These create an inactive frontage that is detrimental to the street scene and does not support the aspiration of the site allocation to maximise the active frontage to Georgiana Street in the redevelopment of the site. I consider that some of the uses that generate this section of blank frontage could be located elsewhere within the appeal site to mitigate their negative impact on the street scene.

1.11 Returning to the arrangement of pilasters, infill panels and window openings to this elevation as a whole, I disagree with the Appellant's claim (Design and Access Statement, section 4.05 paragraph 6) that: "*The revised treatment of the street elevation produces a calm and coherent appearance ...*". I consider that the irregular spacing of the pilasters within the frame and of the window openings with the infill panels has generated an elevation to Georgiana Street and St Pancras Way that is incoherent and lacks a clear organising logic. There is an absence of regular rhythm or order to the façade that might support the articulation and legibility of the building. For all of these reasons, I consider that the overall impression is of a bland and generic architectural treatment to a building that is out of scale with its surroundings.



View of the proposed building on Georgiana Street with The Constitution PH, right



Proposed elevation to Georgiana Street

Figure 2 *Extract from the Appellant Design and Access Statement, section 4.05*
page 34

Canal elevations

1.12 There are two main parts to the canal facing elevation in the appeal proposal relating to buildings B and C as they are referred to in the Appellant's Design and Access Statement.

1.13 The elevation design of the taller building (B) is described as forming 'a full height bay to the canalside' (Design and Access Statement, p35). This 'bay' is a six-storey screen that seeks to conceal the full width balconies and wide, full height glazed openings to the apartments and the glazed elevations of the commercial lower floors. It is stated that:

"This makes reference to the industrial heritage of the canals rather than emphasising the residential nature of its current use" (Design and Access Statement, section 4.05, p35, paragraph 2).

1.14 I do not consider that this design is successful in achieving the stated aim of creating the appearance of a building in industrial/warehouse use. In my view, the proposed bay represents a superficial interpretation of the essential characteristics of the industrial heritage of wharf/warehouse buildings. Such buildings express a strength and robustness that derives from regular patterns of large, punched openings in load-bearing brickwork. Similar characteristics can be expressed in contemporary brick architecture. However, the proportions of the piers and framing that support the proposed bay are too slender to achieve this. It is particularly apparent in the verified view AVR 002 (Figure 3 below) that the bay is expressed as a brick clad, structurally lightweight, open frame that bears little relation to the architecture of traditional canalside buildings. (Note that AVR 002 is the only rendered view of the proposal provided in the application documents to give an understanding of the visual effects of the proposal).



Figure 3 Detail from AVR 002

- 1.15 Building C rises to five storeys on the canalside in close proximity to the Eagle Wharf building – a three storey restored former forage warehouse identified as a positive contributor to the conservation area. The proposal includes a four-storey projecting bay to the canal frontage of a similar design to that proposed for building B. The Appellant's Design and Access Statement (section 4.05, p35, paragraph 3) states that the projecting bay has similar proportions to the adjacent building on Eagle Wharf and so is intended to relate the scale of the appeal proposal to that of the positive contributor and so the impact of the larger building on its neighbour.
- 1.16 I consider that this design has the same shortcomings within this context as described above in the discussion of the screen to Building B. I also consider it poorly related to the canalside warehouse building typology as these typically have simple, geometric forms rather than layered compositions. Paragraph 4 states that the low pitched asymmetric parapet also references Eagle Wharf. These elements of the design raise questions about how to defer to setting. The Appellant (Design and Access Statement, p35, final paragraph) states that these features of the design complement the positive contributor. In my view, the design of the proposed building detracts from the setting of its neighbour because it is overly fussy and its expression is poorly related to the local architectural vernacular.

1.17 The setback sixth storey to building B is a flat-roofed volume that would be clad in zinc. It is set behind the brick parapet but will be visible in long views towards the appeal proposal. There is no evidence within the Appellant's Design and Access Statement to explain how this element of the design has developed, how it is related to the main volume of building B or how it responds to its context. It adds bulk to the proposal, which is particularly apparent in views of the southeast inner courtyard elevation where it is not set back from the building below. The junction between the zinc clad volume and brick clad building below seems particularly poorly resolved. It does not support the expression of the sixth storey as a subsidiary element (Figure 4 below).



Figure 4 Detail from AVR 002

Materiality and detailing

1.18 I consider the use of a red multi-stock brick as the dominant facing material an appropriate means of developing an architectural language that responds to local character. I accept that contemporary brick buildings do not require ornamentation to relate to the surrounding historic fabric. However, whilst I support the use of brick in the appeal scheme, I do not consider that the way

that brick is used helps to develop clarity of architectural expression. In my view, where the brick is used in vertical bond it emphasises the use of brick as a cladding material rather than being used to reinforce the legibility of the architecture.

- 1.19 I consider that the lack of an architectural approach to the appeal proposal informed by an understanding of the distinctive character of its surroundings has led to the selection of materials and details that are stylistically wrong in the context of this site. Examples of this are the proposed glazed balustrades, brises soleil to the commercial units on Georgiana Street, and the full height glazing system enclosing the stair core to the courtyard south-east elevation. The three types of balcony balustrade material – structural glass for the recessed balconies and metal railings and perforated metal sheet where required to provide privacy to the projecting balconies – are, I would suggest, symptomatic of an architecture lacking in conceptual clarity.

Landscape design

- 1.20 The design of the landscape represents an important opportunity to enhance the understanding of the site's past use and therefore has the potential to make an improved contribution to the character of the area. It could also enrich the experience of using the courtyard space for residents and visitors and help to develop a strong sense of place.
- 1.21 In my view, the proposals do little to allow interpretation or understanding of the infilled locally listed former dock that lies between Bangor Wharf and Eagle Wharf. The portion of the infilled dock within the appeal site is proposed as a subdivided private external amenity space serving the ground floor commercial units.
- 1.22 It is stated that existing granite setts and kerb stones on the site will be salvaged and re-used within the proposals, but I do not consider that they are understood and valued in the manner that the site allocation aspires to. The Appellant's Design and Access Statement (section 4.07, p40, paragraph 2) explains that a blue-black engineering brick with bullnosed edge is proposed for the replacement canal wall and the salvaged setts would be used as an

edging to this wall of three or four courses deep. The narrow ribbon of setts would therefore lie between the blue-black brick wall and the Tegula paving proposed as the main surface to the courtyard. I consider this a decorative treatment that doesn't reflect their historic use of the setts. In my opinion, they should have a more prominent position within the landscape design and the uncoordinated palette of modern and historic materials would undermine the sense of their authenticity.

Response to Appellant Statement of Case

1.23 The Appellant has provided commentary on the reasons for refusal within their Statement of Case. I will address the design issues raised in relation to reason for refusal 6.

1.24 In paragraph 5.44 of the Appellant's Statement of Case the Appellant quotes from an e-mail sent by the Case Officer on 7 April 2016 that said: "*... the layout, scale and orientation of the proposed buildings are, in general terms, considered to be appropriate to the site and broadly supported*". The Appellant argues that as this indicates *broad* support for the scale proposed *in general terms*, height, mass and scale cannot be used as a reason for refusal. This position fails to acknowledge the conditional nature of the support. The Appellant seems not to understand how it can be true that development contained within the same approximate building envelope can have a very different impression of bulk and scale depending on the massing and articulation of its parts, its materials, and the rhythms and patterns expressed in its facades. Refer to paragraphs 1.6 to 1.11 above for my assessment of how the design of the appeal proposal fails to mitigate the impact of its excessive bulk.

1.25 In paragraph 5.45 of the Statement of Case it is stated that:

"Detailed design is subjective and we do not agree with the Officer's objections to the proposals".

The Appellant implies that the officer assessment that the appeal proposal is of poor design quality is a matter of personal taste and individual impressions.

In my view, the assessment of the detailed design of the appeal proposal contained within paragraphs 1.2 to 1.22 above is well grounded in both national and local policies and guidance on design and presents a rational and impartial analysis to explain how the design of the appeal proposal falls short of satisfying those policies.

1.26 The officer objections to the proposals are supported by NPPF Paragraph 60:

"Planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness."
(my emphasis)

1.27 The remainder of paragraph 5.45 of the Statement of Case and paragraphs 5.46 and 5.47 contain a short defence of the detailed design that I consider insubstantial and inaccurate. It describes the elevation of Georgiana Street as follows:

"This is designed to provide visual interest in oblique views when approached along the street, rather than to be seen solely as an elevation. The sense of rhythm of the composition and the ground floor's deep reveals give it a unified appearance".

I do not agree that the design provides visual interest in any views of the proposed building and have provided evidence in paragraphs 1.6 to 1.8 above to demonstrate that the design of the Georgiana Street elevation is excessively flat and fails to relieve the monolithic massing of the building. I have also explained with reference to the submitted design drawings in paragraph 1.11 above that there is a complete absence of rhythm and order to the composition.

1.28 The Statement of Case paragraph 5.45 states:

"The single step at the western end of this frontage acts as a transition between the smaller two storey building at no 54 Georgiana Street and the taller building".

In paragraphs 1.9 and 1.10 of my assessment above I set out my view that the design of the lower part of the Georgiana Street elevation of the appeal proposal is poorly related in scale to no 54 Georgiana Street and the residential context to the west of the appeal site.

1.29 The Appellant's Statement of Case paragraph 5.46 states that:

"Section 4.05 [of the Design & Access Statement] also explains how the detailed design of the canalside buildings, with their full height bays, alludes to the industrial heritage of the site and to the Victorian warehouse on the site adjacent at Eagle Wharf".

Only one of the bays of the canalside buildings is full height. In the commentary provided in paragraphs 1.16 and 1.17 of my assessment above I explain that I consider that this aspect of the design is poorly related to the industrial heritage of the canal and to Eagle Wharf.

2.0 SUMMARY AND CONCLUSIONS

- 2.1 In this section I have referred to, endorsed and adopted the evidence of my colleague Sarah Freeman that the proposed height, scale and massing must be judged to be inappropriate in this context. I have expanded on this by explaining below how the detailed design of the appeal proposal reinforces the appearance of excessive bulk and overbearing scale. Moreover, I have made the case that a failure to develop a clear architectural concept and language undermines the articulation and definition of massing and contributes to the appearance of excessive bulk. Furthermore, I have connected the lack of clarity of architectural expression in the design of the appeal proposal to the lack of evidence that the design process has been informed by a thorough understanding of local distinctiveness.
- 2.2 Paragraph 64 of the NPPF requires local planning authorities to refuse permission *"for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions"*.
- 2.3 I have had regard to the current local and national planning policies and I have considered the statutory duty throughout. I confirm that the opinions expressed in this evidence are my own. For the reasons given above and having regard to all other matters raised in the Council's evidence taken as a whole, I respectfully invite the Inspector to dismiss the appeal.