

Charlotte Street Association

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**Regeneration & Planning,
Development Management,**
London Borough of Camden,
Town Hall, Judd Street, London WC1H 8ND.

For the attention of Laura Hazelton, Planning Officer.

By email to: planning@camden.gov.uk

19th April 2018 AMENDED letter (Replaces our letter dated 18th April 2018)

Dear Laura Hazelton,

**Re: Reference 2017/6080/P: Re-Consultation & Amendments:
Cyclone House, 27-29 Whitfield Street, London W1T 2SE:**

RE-CONSULTATION: Change of Use of Basement, Ground Floor and 1st Floor to flexible Retail, Business and Non-residential Institutional Uses (Classes A1/B1/D1); and 2nd Floor to Office Use (class B1a); erection of single-storey roof extension (i.e. new 3rd Floor) to create additional Office space (i.e. class B1); rooftop plant enclosure (at new 4th floor level); facade alterations including new (additional) front entrance, replacement windows, infill of lightwell at basement level; and removal of rendered panels and application of limewash to existing brickwork.

AMENDMENTS include changes to the design, materiality and fenestration of 3rd Floor extension; and changes to the mineral paint treatment and render removal method.

Our Association wishes to make comments and objections as set out below, concerning the above Re-consultation of, and Amendments to, this planning application.

The Amendments to this Application:

To clarify, there appear to be two main amendments to this application, which are:

(a). “The design, materiality and fenestration of 3rd Floor extension”:

The design for the proposed 3rd Floor Extension is now the same as that shown in the (other current) application Planning Reference 2017/6922:

- with windows in a solid wall (“hole in the wall”) approach (as also in the previous schemes);
- re-instatement of Juliet balconies to the windows (south elevation) overlooking the green roof;

although the new brickwork is to be painted with a mineral paint.

(b). “Changes to the mineral paint treatment and render removal method”:

All the render is still to be removed.

But, instead of applying a limewash to the brickwork, a mineral paint is to be applied to all the brickwork (existing fair faced brickwork; revealed brickwork & new brickwork).

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The current applications:

As there is some confusion on the differences between the three current applications, we would like to summaries below what appear to be the main differences:

(1). Planning Ref. 2017/6922/P: registered 22/12/2017: (yet to be determined):

- Proposed 3rd Floor extension: “windows in solid wall” design
- Existing fair faced brickwork is retained (with no limewash/paint applied)
- Existing render is retained
- New 3rd Floor storey is rendered

(2). Planning Ref. 2017/6080/P: Initial application: registered 07/11/2017:

- Proposed 3rd Floor extension: framed & full-height glazing design
- Existing render removed; revealed brickwork repaired and limewashed
- Existing (fair faced) brickwork is limewashed

(3). Planning Ref. 2017/6080/P: Re-consultation & Amended application: (current):

- Proposed 3rd Floor extension: “windows in solid wall” design, (i.e. same as for the 2017/6922/P application).
- Existing render removed; revealed brickwork repaired & painted with mineral paint
- Existing (fair faced) brickwork is painted with mineral paint
- New brickwork of proposed 3rd Floor extension is painted with mineral paint

Our COMMENTS and OBJECTIONS:

We have previously made comments on and objections to the various previous applications. These have included:

- our letter of 31st January 2018 concerning the recent 2017/6922/P application; and
- our letter of 7th December 2017 concerning the recent initial 2017/6080//P application.

Our comments and objections in both these above two letters still apply to the relevant aspects in the current Re-Consultation & Amendments; and ask that they are still taken into account.

But, so that there is no doubt or confusion, we set out below our relevant comments and objections. And, in addition, we also set out our comments/objections concerning the Amendments in the current Re-Consultation, which includes the removal of all the existing render and newly proposed application of mineral paint to all the brickwork.

1. Design & Access Statement re. judicial review:

The Design & Access Statement says that the decision on the previous application (2016/6495/P) was the subject of a judicial review and was quashed “... *due to claims that the Council did not follow correct procedure*”. Our understanding is that the reasons for the decision being quashed were more than procedural matters.

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2. Setting of the Listed building: objections to proposed 3rd Floor and 4th Floor:

(a). We still wish to object to the proposed 3rd Floor Extension together with the proposed large 4th Floor Plant Room. This is regardless of the actual design treatment, because, as in the previous applications, we think that the bulk of these two new extensions is seriously detrimental to the setting of the Listed Building next door at no. 1 Colville Place, when viewed from the long view in Whitfield Street, and from the public open space of Crabtree Fields.

(b). The quality and setting of the Listed Building next door at 1 Colville Place:

Recently, buildings from this period are now being appreciated again (including in many recent publications). The listing describes this house as being immaculately detailed and is a rare example of a modernist infill scheme of sophistication and careful taste. But its setting and the way it is built in context needs also to be fully appreciated - its design not only relies on proportions and materials, but on the way it is "knitted into" the terrace, and does not compete with the terrace.

By contrast, the proposed 3rd and 4th Floor (plant room) extensions, due to their bulk, will overshadow 1 Colville Place and thus be seriously detrimental to its setting.

(c). The Proposed "Elevation 2" drawing (drwg no. 51517-P-61 Rev M) gives the wrong impression because the front elevation of 1 Colville Place is shown in the same grey tone as the back of the Goodge Street buildings, as though all these buildings are in the same plane. The back of the Goodge Street terrace buildings are set well back (some 16 metres) and not seen in the long view in Whitfield Street.

As pointed out on several previous occasions, it should be noted that, on this drawing, Goodge Street building is still confusing and incorrectly labelled as "21 **Whitefield Street seen beyond**", when in fact it should be "21 **Goodge Street seen beyond**".

(d). A truer impression is given in the elevation drawing Proposed Colville Place Elevation as shown on page 6 of the Design & Access Statement where the back of the Goodge Street buildings (again still incorrectly labelled as 21 Whitfield Street) are shown in white.

Thus, this drawing more truly shows the considerable bulk of the proposed 3rd Floor Extension and the 4th Floor Plant Room in comparison with the Listed Building of 1 Colville Place.

(e). Viability of scheme without the need for the 3rd Floor extension:

Although we have commented in some detail on the design of the proposed Extension and the affect on the setting of the Listed Building next door, we also wish to query the need for this Extension in terms of overall viability of the scheme - our impression is that the refurbished scheme is perfectly viable without the need for the Extension.

3. Render and Brickwork; and proposed application of Mineral Paint:

Regarding this Amended Application (Re-Consultation), we strongly object to the proposals regarding the removal of the render, the treatment of the brickwork, and the application of Mineral Paint to all the brickwork; (to existing fair-faced brick; to revealed brick; and to the new yellow London stock bricks of the proposed 3rd Floor storey). We feel strongly that the existing (and new brickwork) should be retained as fair-faced and render retained on the existing un-exposed brickwork.

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3. Render and Brickwork; and proposed application of Mineral Paint - continued:

(a). Proposed Mineral Paint finish:

As can be seen from the trial samples on site, the mineral paint application gives an overall artificial look:

- there is no retention of the existing natural texture and roughness of the brick surface, and instead there is a smooth undulating surface;
- there is the loss of the natural variety in colour and different materials in the surface of the natural fair-faced brick; (both of the existing fair-faced bricks, as well as the new yellow London stock bricks for the proposed 3rd Floor extension).
Also, although the proposed yellow London stock for the new extension is appropriate for the area when fair-faced, it seems strange to then cover it up with the Mineral Paint and to lose its naturally attractive visual characteristics.
- also, as can be seen in the trial samples on site, the repairs to the damaged bricks (as a result of the removed render) are completely unconvincing - the resulting brick face is flat and of uniform colour with none of the varied characteristics of London stock brick.
- one of the wonderful qualities of London stock brick is its visual variety; the mineral painted surface is instead going to produce a uniform blandness.

(b). Mineral Paint finish re. setting of Listed Building, and Conservation Area:

As a result, this proposed mineral paint treatment will not compliment the setting of the Listed Building at No. 1 Colville Place. One of the main characteristics of the architecture of this Listed Building is the natural fair-faced brickwork and the exposed concrete. The philosophy of such architecture of the 1960s was to be true to the materials and show their natural qualities. Thus, the loss of the natural qualities of the brickwork and its "brickiness" (both existing and new) at Cyclone House is detrimental to the setting and context of the Listed Building. Such a finish is quite out of character with the immediate area, does not give the "urban" character of Fitzrovia, and will not further enhance the visual quality and appearance of the Conservation Area. Also, as is pointed out in PAYE's "Project Brief", the painted surfaces will need repeat painting, which the natural brick surfaces obviously do not need.

(c). Removal of the render:

re. applicant's Addendum to Design & Access Statement, and PAYE's "Project Brief":
We think that the applicant's Addendum (para 1.8) is too optimistic in saying that PAYE reckons "... the render can generally be removed quite easily ...".

The tone of PAYE's document is more circumspect. In their section "Render Removal", they recognises that the existing render is "... very hard, much harder than the substrate ..." [i.e. much harder than the brickwork/substrate under the render]
- which is why the surface of the brickwork can easily be damaged when removing the render.

This supports what we have always previously said about this render being hard. As can be seen on the samples on site, there is a quite a high proportion of damaged bricks. PAYE go on to say that "... this is not a precise science and therefore [the ease of render removal] cannot be predicted ...".

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(d). PAYE's "Project Brief":re. applicant's Addendum to Design & Access Statement, and PAYE's "Project Brief":

Although we appreciate that PAYE is a well known contractor for the carrying out conservation works to buildings, they are not necessarily an independent consultant. Their document, understandably, is headed "Project Brief", describing how the work required by the client will be carried out.

The proposal appears to go against PAYE's own stated philosophy (at start of Brief):

- of "an approach of minimal intervention" - in our view, the difficult removal of the hard render and the painting of good fair-faced brickwork appears to contradict this approach; and
- of "new repairs should not disturb the aesthetic of the architecture" - again, as we have described earlier, the proposals are very much changing the existing aesthetics of the architecture.

Under "Trials on Site", PAYE says that the mineral paint "... allows the character of the brickwork to be read ...". As we have described above in the earlier part of our letter, this is not so with the samples viewed on site.

Under "Trial Detail", PAYE says that the "semi-translucent" paint allows "... the character of the brickwork to be read" – this is simply not so when the site samples are viewed; the variety of colour and naturally textured surface of the bricks is lost.

Under "Repair Proposals", PAYE says the intention is to "create an amorphous repair" "amorphous" usually means "lacking definite shape; or formless; or of no recognisable character". Unfortunately, this accurately describes the lack of, and loss of character and variety which can be seen in the brickwork samples where the mineral paint has been applied; and is the very reason for our objections,

Although the applicant's Addendum (para 1.8) reckons that in PAYE's opinion the "... facade treatment will deliver as high quality and long lasting finish to the building"; this does not mean that this is the correct solution and finish, both architecturally and aesthetically (for the various reasons that we have given above in our letter) in the context of the Listed Building and the Conservation Area.

4. Proposed 4th Floor terrace:

We wish to strongly object to this top floor terrace for the reasons set out below.

This top floor terrace is described as an amenity space, presumably for the 5 floors of office space (B1) together with the A1/D1/B1 flexible uses. A very considerable number of people could use this space, which we reckon could accommodate 20 to 30 people.

The level of this rooftop terrace is well above the tops of the Colville Place houses and the Goodge Street terrace buildings; and thus the noise of people on this terrace, especially in the evenings and at weekends/public holidays will carry to the nearby residential houses and flats. Colville Place is wholly residential; and all the Goodge Street buildings (except for two of them) have residential flats above Ground Floor, which look out at the rear.

We particularly think that there could be serious noise nuisance to the nearby residential in both the Colville Place and the Goodge Street buildings, especially when used in evenings and at weekends & bank/public holidays. With the proposed mix of flexible uses, evenings and weekend use of 27 Whitfield Street are likely.

Furthermore, we have recent/current experience in Fitzrovia of office use to midnight/

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7 days a week (and causing disturbance to the nearby residential flats), reflecting the trend of certain office use 24 hours a day.

5. “Green Roofs” and “Flat Roofs for Maintenance Only”:

There are various aspects which we have previously commented on regarding the flat roofs/green roofs, affecting the nearby residential amenity, as follows:

(a). Existing 1st Floor and 2nd Floor Roofs at the rear:

Both these roofs are marked as “Green Roof”. On the drawings, only the 2nd Floor rear roof is marked as “Flat roof for Maintenance only”. As for the previous schemes, there needs to be a Condition that access to both these two roofs is for Maintenance Only to prevent them being used as a terrace and/or for smoking etc.

(b). 3rd Floor front (overlooking Colville Place) “green roof”:

On the drawing, this new front 3rd Floor flat roof is marked as a “Green Roof”; but again, for the same reasons, there needs to be a Condition that access to this roof is for Maintenance Only.

We trust that the Juliet balconies & their balustrades shown on the drawings are fixed.

6. Proposed Colville Place Elevation - Ground floor windows:

The proposal is to extend the existing Ground Floor window openings down to near floor level. It is not clear if these are opening or fixed windows. There is strong objection due to the likely noise nuisance to the nearby residential in Colville Place.

Conclusions:

1. There is strong objection to proposed 3rd Floor extension and 4th Floor plant room, because their bulk will be seriously detrimental to the setting of the Grade II Listed Building next door at 1 Colville Place.
2. There is strong objection to the removal of the existing render; and the application of the proposed mineral paint to all the brickwork, including to the existing fair-faced bricks, and the proposed new yellow London stock bricks, for the range of reasons given in our letter. The whole affect, including the loss of the natural variety & colour of the fair-faced brickwork will be detrimental to the setting and context of the Listed Building. Such a finish is quite out of character with the immediate area, and will not further enhance the visual quality and appearance of the Conservation Area.
3. There is strong objection to 4th Floor terrace as amenity space, due to the likely serious noise nuisance and disturbance to the nearby residential, especially in the evenings and at weekends & public holidays.
4. Regarding the existing rear 1st Floor and 2nd Floor Green Roofs, there need to be conditions to ensure access is for Maintenance Only.
5. Regarding the proposed Colville Place elevations, there is objection to the lowering of the ground floor window openings, especially if they are opening windows.

We would be grateful to be notified of the Planning Committee date.

Yours sincerely,

Clive Henderson,
Committee Member,
On behalf of Charlotte Street Association.

Copy: CSA Committee.