

6 November 2018

Mr Patrick Marfleet  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Dear Mr Marfleet

## **7abc Bayham Street, London NW1 0EY**

I write with regard to planning application 2018/3647/P for the proposed redevelopment of the site at 7abc Bayham Street. The proposals include the demolition of the existing buildings on the site and their replacement with a new five storey mixed use hotel and office development with ancillary café/bar and gym/fitness facilities.

The site is located in the Camden Town Conservation Area. Consequently any proposals must comply with s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of that area. To the south west of the site is the Grade II listed Camden Palace Theatre. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to grant planning permission for development which affects a listed building or its setting, special regard shall be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

### Demolition of the existing buildings on the site

1. The proposed redevelopment of the site includes the demolition of all of the existing structures currently in situ. It is acknowledged that no.7a is a mid 20<sup>th</sup> century building of no inherent architectural and historic interest. No.7c is of more interest, dating from the late 19<sup>th</sup> century but with modifications to its windows and painted brickwork which detract from its original architectural significance. However, the single storey building at no.7b is clearly of historic and architectural merit. The building appears on the Ordnance Survey map of 1896 and appears to retain its original form and appearance. The supporting Heritage Statement produced by the Heritage Collective seeks to minimise the interest of this structure, referring to it as *"...of no architectural interest being a standard light industrial building that is currently used as an office."* However, this it is not the utilitarian structure that the Statement would suggest. Its front elevation has rusticated stucco which aligns with the ground floor frontage of no.7 to the south and it continues the balanced and rhythmic pattern of 6 over 6 sash windows, characteristic of the terrace to the south and which are a feature of the wider late Georgian/early Victorian character of the Camden Town Conservation Area. Furthermore, its gable facing the road reflects the classical pediment that tops no.9b Bayham Street and which forms a

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distinctive feature within the group. Clearly the frontage to no.7b was designed to contribute architecturally to the townscape along Bayham Street and to respond to the character of earlier adjacent development. Thus the conclusion of the Heritage Statement at paragraph 52 that the buildings on the site, including no.7b are “.....of no architectural interest as altered, modern light industrial buildings” is considered to lack balance and objectivity.

2. Whilst the site as a whole is not identified as a positive contributor to the character and appearance of the Camden Town Conservation Area, the Appraisal and Management Strategy does refer in its list of positive buildings at page 30 to “Bayham Street 1-7 and adjacent” which suggests the intention to include the building at no.7b which sits directly adjacent to no.7 Bayham Street.

3. The Heritage Statement acknowledges that the site has some association with the piano industry “...which forms part of the interest of the conservation area” and which the Appraisal and Management Strategy confirms was concentrated in the mews to the east of Camden High Street. Whilst the piano industry may have represented only some of the site’s former uses, these are shown in the Heritage Statement’s historic research section to have been at a time during the late 19<sup>th</sup> and early decades of the 20<sup>th</sup> century when the piano trade was an important local industry and a feature that contributes to the area’s local distinctiveness.

4. It is therefore considered that no.7b Bayham Street has a degree of architectural and historic merit and makes a positive contribution to the character and appearance of the Camden Town Conservation Area. Its proposed demolition would therefore cause demonstrable harm.

5. Paragraph 196 of the National Planning Policy Framework 2018 (NPPF) outlines that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” In this case the Camden Town Conservation Area is the designated heritage asset and ‘less than substantial’ harm would result from the demolition of no.7b Bayham Street.

6. This policy is mirrored in Policy D2 (Heritage) of the Camden Local Plan 2017 which is clear that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. Specifically, the Council will resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area. The Heritage Statement concluded that no harm would arise from the demolition of the buildings and consequently no case has been made with regard to the public benefits of the scheme, however, it is considered that these would have to be sufficient to ‘convincingly’ outweigh harm.

#### Proposed replacement building

7. The proposed building has its main facade facing Bayham Street and here is of four main storeys with a set-back fifth storey, constructed mainly in brickwork, with areas of metal cladding and glazed brick to the northern elevation.

8. Policy D1 (Design) of the Camden Local Plan 2017 is a key consideration and requires new development to respect local context and character, comprise details and materials that are of high

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quality and complement the local character, as well as preserve or enhance the historic environment and heritage assets. This is reiterated in the supporting text to Policy D1 at paragraph 7.4 of the Local Plan, which is clear 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.”*

The supporting text at paragraph 7.2 of the Local Plan provides a checklist of requirements that developments will be expected to consider, including the character, setting, context, form and scale of neighbouring buildings, the prevailing pattern, density and scale of surrounding development, the impact on existing rhythms, symmetries and uniformities in the townscape, the composition of elevations and the wider historic environment.

9. The NPPF is clear at paragraph 192 that in determining applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness and at paragraph 193 that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

10. The southern section of Bayham Street is characterised by historic buildings of generally three to four storeys in height. These are arranged on narrow plots with a vertical emphasis. Whilst there are some later 20<sup>th</sup> century buildings that have amalgamated historic plots, these still follow the prevailing height and scale of the neighbouring historic buildings. This prevailing pattern continues north of Plender Street where there are remnants of Lord Camden’s early 19<sup>th</sup> century residential development of the area. Looking south along Bayham Street the view is closed by the terrace of three storey mid 19<sup>th</sup> century houses on Crowndale Road which contribute to the coherent scale and height of the surrounding historic development. Where significantly taller buildings form part of the townscape these are the unattractive mid 20<sup>th</sup> century local authority block, Westerham, opposite the application site (and outside the boundary of the Camden Town Conservation Area) and nos.10-12 Camden High Street in the background of views of the site from Bayham Street, identified in the Appraisal and Management Strategy as a ‘negative building’ within the conservation area. Interestingly the supporting Heritage Statement acknowledges the consistency in height along the southern part of Bayham Street, and indeed suggests that the lower height and set back of some of the existing buildings on the site *“...detracts from the constant build line and general height of the buildings along this street.”*

11. Section 5.0 (Design Principles) of the supporting Planning Statement produced by Ambigram Architects demonstrates on pages 46 and 47 how the design concept for the scheme has evolved through several iterations. The fine grain of this part of Bayham Street and the vertical orientation of its traditional 19<sup>th</sup> century facades was clearly the starting point for the design, as shown at image 6 which is annotated to read *“The facade is divided into a series of vertical bays, informed by the existing elevational massing along Bayham Street.”*

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12. What has eventually emerged as the final scheme for the Bayham Street frontage is a single, monolithic block of development, with a strong horizontal emphasis and of a height and massing that towers above the surrounding historic buildings on Bayham Street and Kings Mews.

13. Paragraph 3 of the supporting Heritage Statement confirms the change of approach during the design process:

*"Initially a proposal was put forward for a building which reflected the urban grain of the individual residential buildings adjacent to the application site.....However, during pre-application discussions it was felt that the additional height required for the viable development of the new hotel use would be better suited to an industrial style of architecture. This was met with resistance at the Design Review Panel on 16th March as it was considered that the architectural style did not relate to the more residential character of the existing street scene."*

14. In this case the proposed development fails to respond adequately to its immediate context and the scale, height, grain and detailed design of surrounding buildings. Instead the massing of the proposed development is incongruous and out of character with its context, whilst its faux industrial architectural styling merely serves to emphasise its height and bulk. The proposal consists of four main storeys up to parapet level, rising an entire storey above the parapet line of the flanking buildings at nos.7 and 9b Bayham Street. To the north the attractive and distinctive pediment of no.9b is overshadowed and views of its distinctive profile set against the skyline would be compromised by the presence of the proposed building behind it. Moving further away from the site to the north and south, the parapet height of nos. 1, 3 and 5 Bayham Street is lower and no.9a lower still.



Fig 1 An extract from submitted drawing D-PL-P-0201 showing the proposed streetscene along Bayham Street.

15. Above the four main storeys of the proposed building is a further setback storey. However, this rises flush with the floors below it on the northern elevation, with only a nominal setback from the main front façade. The supporting Planning Statement and Heritage Statement suggest that *"Increased areas of glazing will create a contemporary feel to the massing...."* and refer to *"...lightweight materials in a contemporary design."* However, this upper storey is framed in brickwork, with glazing recessed within it, some of which is obscured by perforated metal screens. Consequently the solidity of the upper most storey, regardless of its modest setbacks will be a prominent feature in views along Bayham Street, particularly given the significantly lower height of the flanking historic buildings and will detract from the coherent scale of the surrounding context.

16. Whilst the historic light industrial use of the site is not considered by the applicant to make a positive contribution to the conservation area, it has been used to inform the proposed design and to justify the incorporation of a building of this height and scale as outlined above at paragraph 12 of this letter and at paragraph 75 of the supporting Heritage Statement which highlights the design's *"...references to the light industrial character of the application site itself."* However, although there have been attempts to divide the façade into bays through the differential spacing of the windows, the overall width of the site and the application of the design treatment across it creates an incongruous sense of scale within the streetscene. This is emphasised by the bands of large windows which reference 19<sup>th</sup> century factory and warehouse architecture but which fail to reflect the diminishing fenestration of the traditional domestic buildings which flank the site. The size and proportions of the windows themselves, whilst continuing the industrial architectural theme are at odds with the solid to void ratio of the surrounding historic buildings which have a higher proportion of brickwork to glazing.

17. To the rear of the site the proposed scheme will have a detrimental impact upon the character and appearance of Kings Terrace. The Camden Town Conservation Area Appraisal and Management Strategy describes the various mews streets to the east of Camden High Street and notes that the *"....predominantly two-storey buildings given the narrow passages their special scale."* Kings Terrace is lined with modest two storey buildings, some of which have received a traditional mansard. When combined, the narrow street with its historic cobbled surface and the diminutive scale of the historic buildings creates an intimate character. Rising behind the buildings at nos.2, 4 and 6 King Terrace, the proposed development would detract from the historic character of Kings Terrace and would visually intrude into the setting of the mews houses both from the public realm and in private views from the rear windows and roof terraces of the individual properties. The supporting Heritage Statement indicates that *"To the rear a more contemporary style of glazing will be used to reflect the modern character of the building where visible from Kings Terrace."* These extensive areas of glazing, metal cladding and glazed tiles, when combined with the height, bulk and proximity of the proposed development to the mews houses would have an overbearing visual impact.

18. The south elevation of the proposed development faces no.48-56 Bayham Place. This building is identified in the Camden Town Conservation Area Appraisal and Management Strategy as making a positive contribution to its character and appearance. Notwithstanding the large and incongruous additional floors that were approved to the building (2017/2739/P) in October 2017, the proposed development at 7abc Bayham Street is considered to detract from the setting of this attractive former industrial building. The proposed southern elevation is situated extremely close to no.48-56 and has a very awkward relationship with the uppermost oversailing modern storey, currently under construction. This creates a narrow, dark gap between the buildings and represents an illogical and poorly designed junction within the townscape.

## Conclusion

19. The proposals are considered to cause demonstrable harm to the character and appearance of the Camden Town Conservation Area as a result of the loss of the existing building at 7b Bayham Street and due to the height, bulk, massing and detailed design of the proposed replacement development which fails to respond adequately and sensitively to the surrounding historic context. Consequently the application fails to comply with the statutory duty at s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve or enhance the character or appearance of the conservation

area. The application is also contrary to policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017

Yours sincerely

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