

Mr P Marfleet
Planning Department
London Borough of Camden
5 Pancras Square
London
N1C 4AG

By email only

16 November 2018

Dear Patrick

**PLANNING APPLICATION REF: 2018/3647/P
7A,B,C BAYHAM STREET, LONDON, NW1**

Further to our letter dated 9 October, we submit further technical evidence in support of our ongoing objection to the above planning application. Expert advice now confirms that the proposed development would cause demonstrable harm to the character and appearance of the Camden Town Conservation Area; and would result in noise impacts well above WHO noise guidance for serious disturbance.

With reference to the enclosed technical reports prepared by Fuller Long and Vanguardia Consulting, we set out the key findings relating to these impacts below.

Heritage

Fuller Long conclude that the proposed development at 7A,B,C Bayham Street causes 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 its proposed replacement, which, in their professional view, fails to respond adequately and sensitively to the surrounding historic context.

Fuller Long consider that 7B Bayham Street has a degree of architectural and historic merit. Indeed, the Camden Town Conservation Area Appraisal and Management Strategy refers to "*Bayham Street 1-7 and adjacent*" in its list of positive buildings at page 30. This confirms the inclusion of 7B, which is directly adjacent to 7 Bayham Street and its proposed demolition would therefore cause demonstrable harm.

Paragraph 196 of the NPPF (2018) 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*".

This 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.

However, there are no demonstrable public benefits that outweigh the considerable harm caused by the proposed development when taken in the round. The only benefit that we have found is the applicant's indicative commitment to provide 20% of office desks at a 50% discount.

As stated in our letter on 9 October, the proposed hotel would be outside of the defined town centre for Camden Town, its built form and massing would cause significant harm to neighbouring amenity, and the required demolition of 7B Bayham Street would harm the significance of a designated heritage asset.

It is Fuller Long's conclusion that 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.

Noise

The application and supporting Noise Assessment prepared by Sandy Brown have been scrutinised by our appointed experts, Vanguardia Consulting. They have also undertaken their own independent noise assessment, and these results are set out within the enclosed report for your further consideration.

Vanguardia conclude that the predicted noise from the proposed new courtyard is "*well above the WHO noise guidance for serious disturbance outside*". It is also "*well above*" the existing background noise level. The courtyard area therefore carries a serious risk of noise impact to its residential neighbours, thereby contravening Local Plan Policy A4 (Noise and Vibration). This has not been considered by the applicant's appointed consultants, Sandy Brown, as their report is limited to the assessment of plant noise and vibration.

We must therefore reiterate that the proposed development represents a clear breach of national and local policy, and also represents a clear and significant threat to our quality of life and the enjoyment of our homes. We once again urge the Council in the strongest possible terms to refuse this application.

Yours sincerely

