

26 February 2019 Our Ref: JCL/588

The Director of Planning and Regeneration
London Borough of Camden
2nd Floor
5 Pancras Square
London
N1C 4AG

Dear Sir

PLANNING APPLICATION
2-6 CAMDEN HIGH STREET
LONDON NW1 0JH

You will be aware that your Officer, Thomas Sild, provided pre-application advice with regard to proposals relating to extensions above roof level and to the rear at 2-6 Camden High Street dated 12/02/2018. Your reference was 2017/6489/PRE.

A subsequent application, submitted by Trevor Clapp of Foundation Architecture in July 2018, was not registered because the issue of a mix of uses, including housing had not been addressed. It had not been an issue identified in the pre-application advice but became the subject of an ongoing correspondence with Mr Sild. The outcome of this correspondence is that, in his view, Mr Sild now accepts that the provision of housing in this case is not warranted or appropriate due to the proximity of a late night music venue. Consequently, since no housing is proposed, the issue of affordable housing, or a contribution towards it, does not arise. I will return to this issue later having first considered other matters which were the subject of the pre-application advice.

In his advice Mr Sild accepted that he was content that the building should be extended to the rear and that a set back extension at fourth floor (roof) level would be likely to be acceptable. However he was not convinced that a limited fifth floor extension could be designed in such a way that views of the dome of the listed Koko Building would not be impaired. Consequently he thought that the proposals then before him could lessen the prominence of the theatre as a landmark building. However he went on to say that any proposal at roof level "must really demonstrate that it is not lessening the prominence and setting of the theatre through its scale, siting and materials".

The Architects have revised the scheme to meet Mr Sild's concerns by setting back the rooftop extension from the existing façade line and reducing the scale of the rear addition. Their revised scheme provides a suitable "top" to the building and sits harmoniously with the other curved roof forms adjacent to it. It has now been demonstrated, and accepted in terms, that views of the Koko dome will not be affected.

Another potential issue identified by Mr Sild was that of overlooking new residential units in the 48-56 Bayham Place development to the rear. This has been addressed and overcome by way of obscuring the relevant windows and these are shown coloured blue on the submitted elevations.

I have worked with the Architects in the development of the current scheme and they have produced a comprehensive Design and Access Statement which accompanies the application. This planning statement should be read in conjunction with it.

The Koko building is very prominent, situated, as it is, on the corner of Camden High Street and Crowndale Road. It will become more prominent when the original cupola is restored and the building repainted in brilliant white as now permitted. Realistically it would take a great deal of clearly unsympathetic development on the application site, constructed or painted in bright colours, for it to compete with the Koko building in terms of prominence. It is understandable that the immediate view might be taken that additional height on the building at 2-6 Camden High Street would inevitably impact on the Koko Building but what the Architects have demonstrated is that this does not stand up to detailed scrutiny. This is particularly the case following revision of the proposals to use darker coloured materials on the new upper floors on the High Street frontage.

Originally Mr Sild did not feel that the appeal decision permitting a fifth floor at 8-12 Camden High Street in 2003 is comparable. However it related to a building only a short distance from the Koko building and the proposals undoubtedly obscured some views of it. It also related to a building with the same building line onto Camden High Street but where the new floor had a limited set back. The proposed new floors at 2-6 are set back further and the overall height of the building will remain considerably lower than the extended 8-12 Camden High Street. I gave evidence at the 2003 Inquiry and I recorded at the time that the issue of the Koko building was given very careful consideration. Nonetheless the Inspector concluded that she did "not consider that it (the new 5th floor) would block views of the copper dome to any significant effect". There was an acceptance therefore that some views would be, at least partially, blocked. The current proposals would not have such an affect.

In terms of design it is important to recognise that it is by the same Architects as in the 8-12 case and follows very similar principles. What the inspector said in this regard was:

"I note, first, the proposed barrel vaulted roof would emulate the recent rooftop extensions to the Crowndale Centre to the south and Park View House on Miller Street to the north-west. Therefore its appearance would not be alien to other buildings within the Conservation Area that are visible from the appeal site... As such, the proposal would form part of the overall roofscape in this part of the Conservation Area it would give the present building a more finished appearance" (paragraph 9).

I also think that the radical 6 storey development (ground plus 5) which has been permitted at 48-56 Bayham Place must be of some relevance. It is difficult to reconcile this permission with the stated objective, contained in Mr Sild's advice, of retaining smaller scale rear mews whilst retaining the hierarchy of the principal buildings along the High Street. Nonetheless it does accord with the stated objective in the Camden Town Conservation Area Appraisal of

retaining the distinctive and varied character of this part of the Conservation Area. The proposals in this case will also contribute towards this. They will also go some way towards meeting the concern expressed in the Camden Conservation Area Appraisal about the run down nature of the southern part of the High Street.

Mr Sild also raised the issues of Amenity and Transport and it will be seen that they have been fully addressed in the supporting documentation.

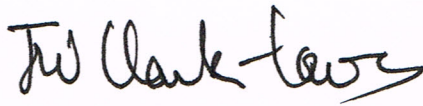
I return now to the issue of housing. The key policy is your Local Plan Policy H2 and in particular the following parts of it which identify considerations which should be taken into account when deciding whether or not self-contained housing should be required:

- H2 a. this identifies the character of the development, the site and the area as being relevant. What is proposed is an extension to a purpose built office building with retail use on the ground floor. It is a High Street property facing onto a major road, the A400, which carries a high volume of traffic between north east and south east London. It also immediately overlooks the traffic lighted junction of the A400 with both the A4200 and the B512. The relevance of this is that it is inevitably a particularly noisy location with cars pulling away from the lights and generally. In addition the revitalisation and extensions to the Koko building will add considerably to the ambient noise levels particularly at night (it is a late night venue) when people will assemble in the area around the statue where there is seating and cycle parking available. In short this is an inappropriate location for new housing development, a point which is now agreed with the Council's Officers.
- H2 d. this addresses compatibility with non-residential uses. The Architects did examine the potential for the introduction of an element of residential use and plans were provided to Mr Sild. It became clear that the requirement for separate means of access and the inevitable inter-action between the existing office occupiers and any new home owners would result in an unwarranted loss of useable space and awkward coexistence. This would be likely to cause the Council difficulties in the future due to noise from the adjoining music venue which has recently received planning permission for its expansion.
- H2 h. this concerns the efficiency and overall quantum of development. my comments relating to H2 d. also apply.
- H2 g. This is a case where it has already been demonstrated that the existing occupiers of the B1 space on this site are in desperate need of additional office space. To achieve this temporarily you will be aware that planning permission was recently granted for a link to be created between 2-6 Camden High Street and 8-12 Camden High Street to go some way towards meeting this need. This has helped but is far from ideal and the office occupiers will be greatly assisted by having all their space available under one roof. This is, therefore, a case where the provisions of H2 g. have already been demonstrated to apply.

More generally you will be well aware that the General Permitted Development Order of 2015 gave rise to a most unwelcome loss of B1 floorspace in Camden where historically the protection of business space, particularly small business units, has long been a priority which has hitherto been strongly defended. The current proposal is an opportunity to go a small way towards redressing the balance in an area where a large quantity of new residential floorspace has already been recently permitted.

As will be seen many of the tests set out in Policy H2 are met and this is not a case where a mixed use development can be justified. I therefore urge the Council to grant planning permission for the well considered proposals which are being submitted.

Yours faithfully

A handwritten signature in black ink, appearing to read 'JW Clark-Lowes', with a stylized flourish at the end.

Jeremy W Clark-Lowes MA Hons (Cantab) FRICS

Principal: JCL Planning