

17 April 2019

**Delivered by email**

Nora-Andreea Constantinescu  
Planning Officer  
London Borough of Camden  
5 Pancras Square  
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Ref: JAML3008

Dear Nora,

## **1 STEELES STUDIO'S, LONDON, NW3 4RN - FULL PLANNING APPLICATION RN: 2019/1057/P – RESPONSE TO CONSULTATION COMMENTS RECEIVED**

We write on behalf of the applicant, in relation to the full planning application currently under determination at 1 Steele's Studios for the retention and refurbishment of the existing 19<sup>th</sup> century studio building; the demolition of remainder of modern buildings on the site to provide a new, re-configured three bedroom single-family dwelling; and associated boundary alterations and landscaping treatment.

This letter has been prepared to further assist the Council and local planning authority in determining the application in responding to consultation comments received on the application. This letter provides a commentary following the Eton Conservation Area Advisory Committee's (CAAC) written response to the London Borough of Camden, dated 31<sup>st</sup> March 2019 and a response to the two comments made on behalf of residents of the adjacent building, Stanbury Court.

### **Reflections on the Eton Conservation Area Advisory Committee's comment**

We support the CAAC's feedback regarding the Site's existing quality and contribution to the Eton Conservation Area, via its modest and secluded character. The proposed development is based on a proportionate understanding of the site and its contribution to the character and appearance of the conservation area as set out in the submission documents. This understanding of heritage significance was explored in depth at the pre-application stage, in discussions with the local authority, in terms of identifying opportunities and constraints at the site. The extensive discussions and meaningful design amendments explored at pre-application are reflected in the final submitted design.

The CAAC highlights that the proposals will nearly double the floor area of the existing property, and that this would have a detrimental impact on the density of the Steele's Studio enclave. We note that much of this additional floor space would be located below ground at basement level, and would have no external manifestation, or impact on the perception of density in the immediate townscape. We also note that density is not in itself an indicator of impact on heritage significance.

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The CAAC gives the view that as part of the proposed design, the original studio building would become a minor part of the built form on Site. The Design and Access Statement prepared by James Gorst Architects, and the Heritage Statement prepared by Turley Heritage, both explain how the visibility and legibility of the original studio will be enhanced by the removal of later extensions, and the disposition of new built form away from the historic building. Indeed, pre-application feedback received from officers confirmed the view that the new built form would appear deferential and subordinate to the original studio, and allow a better appreciation of the parent building than the existing, detracting extensions. It is positive that there no objection from the CAAC to the demolition of these later additions.

The CAAC identifies that the new built form would create an elevation to Haverstock Hill that diminishes the existing gap between the Sir Richard Steele pub, and Stanbury Court. The Site is located at a significant distance from the building line on Haverstock Hill, and that this recessed location means that the existing gap between the pub and apartment block will be preserved. Meanwhile, as explained in the application Heritage Statement, the east elevation of the new built form will respond to, and integrate with, the modest, secluded, informal, and complex nature of the existing the studio enclave. We note that the local authority has previously expressed warm support for the 'arrangement' of the proposals at pre-application stage; and we have also provided clear and robust justification in the Design and Access Statement and Heritage Statement, as part of the application.

In overall terms, the disposition, form, massing and design of the replacement built form has been carefully-considered in light of the surrounding townscape context; and also revised and refined over the course of detailed pre-application discussions. The result is an application scheme that is of the highest architectural quality, strongly contextual, and which will enhance the character and appearance of the conservation area.

In response to the CAAC's request for additional drawings, we consider that the drawings within the submission package are sufficient to compare existing and proposed, and to understand the nature / impact of the proposals. To clarify, the Design and Access Statement contains comparisons of the initial pre-application design against the submitted proposals, to illustrate the revisions that have been made ahead of submission as a result of significant pre-application discussions with planning and conservation and design officers, particularly around form and massing. Notwithstanding this, we include with this letter additional floorplans and elevations showing the existing massing overlaid with the proposed.

## **Reflections on the Residents of Stanbury Court comment**

In line with the council's planning policy guidance on basements (CPG4), the planning application is accompanied by a Basement Impact Assessment (BIA) which seeks to demonstrate that the proposed excavation and proposed development will not cause harm to the built and natural environment and local amenity and will not result in flooding or ground instability.

The BIA is being independently audited by the council's appointed consultant Campbell Reith. Once their review is complete, a report will be issued that confirms the proposed excavation is in accordance with the Council's requirements.

If planning permission is granted there will be conditions attached to the decision to ensure that the development will be carried out strictly in accordance with the BIA, including any recommendations that Campbell Reith may state within their final audit report.

There will also be a condition to state that a suitably qualified chartered engineer (with membership of the appropriate professional body) has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works. The appointed engineer will ensure compliance with the design which will also be checked and approved by a building control body.

Furthermore, a Construction Management Plan (CMP) is likely to be secured by Section 106 legal agreement to ensure the proposed development does not create traffic congestion and lead to a loss of amenity for surrounding occupiers in accordance with Camden planning policy A1.

With regards to noise from the proposed demolition and construction works, this is subject to control under the Control of Pollution Act 1974. Which restricts the time that building works can be carried out (between 08.00 and 18.00 hours Monday to Friday, 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays).

With regards to nearby trees located by the adjacent development, Stanbury Court, these have been investigated and discussed within submitted Arboricultural Impact Assessment report prepared by Landmark Trees. The subject trees are identified within the report as T1 (Lime tree), T2 (Cherry tree) and T3 (Lime tree) and site investigations have confirmed that the level change and retaining wall to the west of the site (Stanbury Court) have significantly inhibited root development by T1, T2 and T3 into the application site. The report states that where the proposed basement level encroaches the theoretical Root Protection Areas (RPAs) of T1, T3 and T4, manual excavation of the top 750mm of the basement line in conjunction with pre-emptive root pruning will be required. The report furthers this discussion by stating that where the structure encroaches within parts of RPAs not otherwise affected by the basement level, low-invasive foundations (i.e. discontinuous footings with suspended beam(s) / raft between) will be employed, relative to the gross footprint / RPA encroachment. Flexibility of footing placement (relative to root location) will be built into the design, with the pit locations trial excavated by hand under supervision. Subject to these measures, the overall impact is likely to be very low/low for all three trees.

In addition, there will be an attached condition that will ensure that all recommended tree work will be carried out in accordance with the relevant recommendations of British Standard 3998: 2010.

We trust the above is clear, and assists you in determining the application. If you require any further information or clarification, please don't hesitate to contact us.

Yours sincerely,



Fiona Flaherty  
**Senior Planner**

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