From:
 05 May 2020 19:16

 To:
 Jeffery, Alyce

 Cc:
 Planning

Subject: RE: 3A St Paul's Crescent Ref 2019,2951/p

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## Dear Alyce

1. We have reviewed the revised application drawings, but sadly see very little variation between the original and the latest set of drawings: there have been no significant changes to the envelope. The drawings are still unsatisfactory. This is evident from the table below where for ease of reference I give below our observations against our original comments

Comments	Observations
1. The drawings are technically inadequate	Drawings remain technically inadequate.
1.1. The drawings do not indicate the relationship of this proposal to 30 Cantelowes Rd (not numbered on the location plan). It is therefore difficult to assess how the increased height of the building will impact on the adjoining property with respect to loss of daylight.	No additional information provided
1.2. The existing (1:50) and proposed (1:100) elevation drawings are drawn to different scales. There is no obvious reason for this, but it is not helpful in correlating the drawn information. The proposal drawings should be resubmitted at a scale of 1:50.	No change to drawing scales
1.3. The Daylight and Sunlight Analysis only relates to 31 Cantelowes Road.	No additional information submitted.
1.4. The existing and proposed Sections BB should be amended to indicate rear elevations to 30 and 31 Cantelowes Road.	Recommendation not implemented. The additional drawing would clearly indicate the proposal relative to existing windows at both 30 and 31 Cantelowes Road and any consequent issues regarding loss of light. The Daylight calculations prepared indicate the proposal will be acceptable

1.5. Section line B-B is not indicated on the drawings but, that apart, an additional section closer to the rear of no's 30 and 31 Cantelowes Rd would be helpful.	Recommendation not implemented
1.6. The Design and Access Statement acknowledges (page 6, item 4) that the property will be modernised throughout to comply with current building regulations. This is not reflected in the drawings where for example • There is no increase in the thickness of existing walls to accommodate the insulation that will be required. • The proposed new staircase from ground to first floor indicates 12 risers for an overall rise of at least 2.50m. There will need to be at least 13 risers assuming the going is 225mm	No change, i.e. no insulation to external walls, no change to staircase. The proposal may not full comply with building regulation requirements. See later item
The drawings should therefore be updated to indicate a realistic structure that is compliant with Building Regulations	
2. The bulk of the proposed development does not relate well to neighbouring buildings and is therefore inappropriate  2.1. The height of the proposal is increased unnecessarily by incorporating 2.5m of headroom in the proposed new first floor bedroom. This contributes to an overall apparent height increase in the building of 0.72m as stated.  2.2. We suggest that reducing the headroom and all roof levels by 300mm would help significantly in limiting the increased height of the building from the 720mm additional height referred to in the Design and Access Statement and lessen the reduction of light to adjoining properties.	No change in height of proposal, i.e. first floor ceiling height of 2.5m retained.
3. To maintain the current rhythm of the windows, we suggest that those on the first floor south elevation would be more in keeping with ground floor windows than the casement windows proposed	Change to the first floor windows referred to is the addition of a mid height horizontal glazing bar. The metal casement windows are otherwise retained. Our wording was probably incorrect in the assessment so 'would' rather than 'should' was carried to the submitted comments, i.e:  'To maintain the current rhythm of the windows, we suggest that those on the first floor south elevation should be more in

	keeping with ground floor windows than the casement windows proposed'  By this we meant that the windows should be timber framed windows to complement the restored ground floor timber windows. The windows proposed are metal and as the only new windows to this street elevation timber would be an improvement complementary to the ground floor.
The claim relating to the long-term durability of the zinc roofing is highly questionable.	Zinc roofing unchanged. Examples of other zinc roofs in the area have now been cited in support.
5. Our concerns about overshadowing, particularly in relation to 30 Cantelowes Road have already been noted in para 1. To overcome any potential problems regarding overshadowing we would suggest a reduction in the height of the building.	Building height not reduced. We are not so concerned about this now having reviewed the Daylight calculations and overall proposal again.

- 2. The only addition has been the submission of a new Heritage and Townscape Appraisal.
  - 2.1. The content is naturally significantly focused as is to be expected from the title. As an aside we really do not see any significant value in this document, having previously concluded that the proposal could preserve (and, not stated, enhance) the conservation area subject to the amendments suggested.
  - 2.2. The document however addresses building regulation points raised by item 1.6 above and states: "3.32 Objections to the scheme have been critical of the development for building control regulation reasons. Firstly, this is outside of the scope of planning and should not therefore form a material consideration to the planning permission". This statement contradicts the Design and Access statement that notes, page 6, item 4:
    - $\bullet {\it 'the property will be modernised throughout to comply with current building regulations'}. \\$
  - 2.3. Modernising throughout would require insulation to be provided to the internal face of existing walls adding approximately 100mm to the 230mm brick wall thickness, thus reducing floor area by perhaps 3m/2 overall. This is not huge but the plans would need to be adjusted to accommodate the perimeter intrusion of 100mm all round. This would affect, e.g. the bathroom, stair position and reduce the width of ground floor living areas by about 200mm.

## 2.4. Staircase:

- The appraisal states: 'the new ground floor to floor height is to be 2.50m. The staircase would have 12 steps making each riser 208mm high. 208mm complies with current building regulations'.
- A 208mm rise is acceptable in Building Regulation terms but for the stair pitch not to exceed 42°, another requirement, the going per tread will approach 235mm. Can this be accommodated?

- 3. Our position with respect to this application remains the same: pending the receipt and review of revised and amended drawings, we recommend the proposal be rejected.
- 4. Whatever the outcome of your deliberations, this application highlights a couple of issues
  - 4.1. Applications should not be registered until the drawings stipulated in your planning advice are submitted in
  - 4.2. That while we completely understand Building Control is not part of the planning process, it is important that later alterations that may be necessary to comply with building regulations can affect the feasibility of an approved proposal

Keep safe and well

Warmest regards



Camden Square CAAC

From: Jeffery, Alyce <Alyce.Jeffery@camden.gov.uk>

Sent: 29 April 2020 15:11

To: David Blagbrough <a href="mailto:david.blagbrough@outlook.com">david.blagbrough@outlook.com</a> Subject: RE: 3A St Paul's Crescent Ref 2019,2951/p

Hi David,

I hope you're keeping well.

A number of revisions have been made to the proposal since your representation was received. Officers are now in a position to make a recommendation for approval, however I would like to provide the CAAC with an opportunity to review the revised drawings and make a comment on the proposal.

Please see attached revised drawings, which are also available to view online.

If possible, could you please advise if you wish to comment, and when the comments will be submitted?

Kind regards,

Alyce Jeffery Planning Officer

Telephone: 020 7974 3292



The majority of Council staff are now working at home through remote, secure access to our systems.

Where possible please now communicate with us by telephone or email. We have limited staff in our offices to deal with post, but as most staff are homeworking due to the current situation with COVID-19, electronic communications will mean we can respond quickly.

From: David Blagbrough <a href="mailto:david.blagbrough@outlook.com">david.blagbrough@outlook.com</a>

Sent: 20 August 2019 16:32

To: Jeffery, Alyce < Alyce.Jeffery@camden.gov.uk > Subject: 3A St Paul's Crescent Ref 2019,2951/p

Dear Alyce

Please our comments on the above application.

Warmest regards

David

David Blagbrough Chair Camden Square CAAC

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