

Camden Planning and Building Development
5 Pancras Square
Kings Cross, London N1C 4AG

Attention: Jaspreet Chana

35 Upper Park Road, London NW3 2UL
Planning Permission 2020/1548/P

Dear Sirs

I am writing to object to the retrospective planning application for an off-street parking space at 35 Upper Park Road. I have lived on Upper Park Road for fifty years and was a principle in an architectural practice in Camden for twenty-five years. I know Upper Park Road and the Parkhill Upper Park Conservation Area very well and I am shocked to see that a significant change to the front garden of number 35 is being built without planning permission.

My objection letter includes comments on the current application, key issues raised by the application, Camden policy relating to the application, design issues and conclusion.

The current application

I am sure that the Council knows that the current retrospective application does not include the drawn information or explanatory text required to understand the proposal, its context or the existing situation before demolition. In the Design and Access Statement, the design text is limited to an intent to repair the front wall and to "... improve the current drive into the house with new landscaping feature and to improve the overall appearance of the front garden." There is no access statement. There is an outline plan drawing of the existing situation before construction started but no other drawings, photographs or descriptions except to note, correctly, that the pavement level space was too small to park a modern family car and allow easy access to the steps that lead to the house. Fortunately, there are record photographs in digital map and image applications to supplement the application's outline plan drawing.

Key issues raised by the application

- the existing situation

As noted by the applicant, the existing pavement level space did not meet current parking standards and was difficult to use. A "Bing" bird's eye views seems to show that the pavement level area was a pedestrian court leading to the stairs to the house. It is my understanding that the pavement level space was used as pedestrian entrance for many years although, with a curb crossing, it had the potential to be an off-street parking space for smaller cars and may have been used for parking in the past when cars were generally smaller.

- the subject of the application

The application's development description is "Front garden landscaping, extension of driveway and associated works." It needs clarifying. The applicant has stated that the existing pavement level space, the "driveway," was too small to be considered a place to park a modern family car and has not asked the Council to approve the extension of an existing off-street parking space. It is obvious, however, from the nearly completed works, that the applicant hopes to create a generous new space for off-street parking.

If the Council takes the view, put forward by the applicant, that the existing pavement level area was not a functioning off-street parking space, an accurate description of the development would be: Demolition of an existing entrance court and the construction of a new off-street parking space, pavement level storage, a new stair to the ground floor of the existing house, new landscape planting and associated works.

- the consultation

Without an application that includes an accurate description of the existing situation or the intended work, I expect that those wishing to comment during the consultation will be unable to understand the issues involved unless they have previous experience of similar situations. The consultation may not represent local residents' views.

Camden parking and conservation area policy

Camden has a borough wide policy to refuse off-street parking in new residential development, conversion to residential use and where there is significant change to existing residential property in areas where good public transportation is readily available.

Camden also has off-street parking policy related to specific areas. For Upper Park Road, it is policies in the Parkhill and Upper Park Conservation Area management strategies. A selection of conservation area policies related to off-street front garden parking includes:

Part 1: Appraisal 6: Problems and pressures: "Cross-over parking ... detracts from the character and appearance of the conservation area."

Part 2: Management Strategy

- 2: Monitoring and Review: "Loss of some front gardens to car parking has occurred incrementally. This should be resisted and, where possible, reversed."
- 4: Recommendations: 4.1 Promotion of good practice: "Improve local knowledge of the Conservation Area status ... to discourage installation of crossover parking" and "...reinstate private front gardens wherever possible."
- 6: Current Issues: 6.2 Maintaining Special Character: Pressure to remove front gardens for parking "will be resisted."

Given Camden's borough wide and conservation area policies it is hard to see how anything other than refusal is possible for a new front garden off-street parking space.

design issues

Resolving the design issues in the current application will require reconsideration of the design in a re-submission or new application.

Access:

- Steps to the house: The steps in the nearly completed works are a new construction and I expect that they do not conform to the Building Regulations requirement for easy access for all ages. A stair that does comply will be much longer than the steps now constructed and will probably have a landing. It will need to be located within a revised design.
- Access path: A Building Regulations compliant path from the pavement to the new steps will need to be included.

Materials:

- Paving: Stone paving slabs, brick paviours or paving blocks are the materials used in the conservation area, but the level of the new construction's structural slab related to the pavement makes resin bound gravel the only solution. Resin bound gravel may be acceptable, but it should be placed as a single colour. The division of the paving into different colours in a trivial design pattern is inconsistent with the character of the existing house and the conservation area.

- Retaining walls: Painted concrete block is not an acceptable material in the conservation area. Painted brickwork to match the house is an obvious solution but timber lining to the retaining walls is an alternative material noted in the application.
- Steps: The new steps will be an important design feature and should be very high-quality materials.
- Storage: Cycle storage may be required in addition to waste and recycling. Added storage for children's strollers and sports equipment would be useful. Clarification of the proposed timber storage enclosure's relation to retaining walls will be needed.
- Lighting: New lighting needs to be considered.
- Retaining wall at the pavement: The front retaining wall is in poor condition and should be replaced in matching brickwork. Both the piers and the gate that existed before demolition should be included in the retaining wall's rebuilding. The wall's relation to the phone equipment box is a design question.

Landscape:

- The house and front garden: The house and the front garden should be seen as a coherent whole: Before demolition, the front garden and pavement level entrance court gave the house a coherent foreground. With the size of the new pavement level space, and the retaining wall at the back of the new construction much closer to the front façade of the house, that relationship has been broken. Regaining an integrated relationship between the house, the front garden and the pavement level space will be a key issue for a revised submission.
- Planting: Planting in the nearly completed works is not well considered. A revised submission should include a detailed planting plan and maintenance strategy.

Visibility:

- Visibility plays: The location and height of the retaining walls and piers at the entrance does not allow for the required front garden parking space visibility splays.

Conclusion

- Given Camden's borough wide and Conservation Area policies, the application for a new off-street parking space should be refused.
- Camden should require a new application asking for permission to reinstate a pedestrian entrance court somewhat similar to the space that existed before demolition, to construct new Building Regulations compliant steps to the house, new street level storage, and a new retaining wall at the pavement's edge, including its piers and gate, and to place new planting in the garden and in the new construction to an agreed planting plan.
- It might be an advantage for the applicant to consult with interested local residents and the Belsize Society before submitting a revised application.

If the application is presented to the planning committee for a decision, I would like to attend the meeting and be on the list of speakers.

Yours faithfully

Dean la Tourelle



07 June 2020