

HB/SB/P7483  
29<sup>th</sup> July 2020

Kristina Smith  
Development Management Service  
Camden Council  
Planning and Development  
PO Box 3333  
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London  
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Dear Ms. Smith,

**London Irish Centre, 50-52 Camden Square, NW1 9XB**

**Application Reference: 2020/1481/P**

**Proposal: Redevelopment of site to provide new and reconfigured community centre and ancillary residential accommodation (Class D1/ D2) involving alterations to retained buildings at No's. 50, 51 and 52 Camden Square including replacement of two storey 'link' building; demolition of Murray Street and Murray Mews buildings and replacement with part-three / part-four storey building (plus basement level) with second and third floor terraces and new entrance; associated landscaping and cycle parking.**

The above planning application was submitted in March 2020 for the redevelopment of the London Irish Centre, 50-52 Camden Square, to provide a new and reconfigured community centre and ancillary residential accommodation. To-date a total of 96 representations has been received by the Council from the local community on the planning application, 27 objections and 69 letters of support.

The letters of objection generally relate to concerns over perceived loss of privacy; impact on the Camden Square Conservation Area; design quality and appearance; loss of daylight/sunlight; impact on infrastructure and highways; noise pollution; removal of trees and impact of basement works. Broadly, the objections and associated topics are categorised as follows:

Item	Topic of Objection	No. of Objections
1.	Loss of Privacy	8
2.	Impact on Camden Square Conservation Area	20
3.	Design Quality and Appearance	12
4.	Loss of daylight/sunlight	3
5.	Impact on Infrastructure and Highways	12
6.	Noise Pollution	20
7.	Removal of Trees	4
8.	Impact of Basement Works	3

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As a long-standing and valued member of the local community, our client would like to take the opportunity through this letter to respond to the primary concerns that have been raised.

### **1. Loss of Privacy**

Some residents have raised a concern about the potential for overlooking and loss of privacy arising from the proposed development. In the first instance it should be noted that the proposed retention and upgrade of No's 50, 51 and 52 Camden Square and the McNamara Hall will not result in any change to the existing relationship with neighbouring properties in terms of overlooking or loss of privacy as only minor reconfigurations to windows, predominately at ground floor level, are proposed on these elevations.

The proposals allow for the demolition of existing buildings on the site between No 50-52 Camden Square and the McNamara Hall and their replacement with a new fully accessible part three / part four storey building. The new building will retain the same building line as the existing property, thereby protecting existing separation distances to the closest habitable rooms on the opposite side of Murray Street (No's 1-15) and Murray Mews.

This new build element also presents a reduced number of window openings fronting onto Murray Street in comparison to the existing building. The proposed development is therefore considered to reduce the number of opportunities for overlooking or loss of privacy to the commercial and residential properties opposite on Murray Street.

It is recognised that some concern has been expressed about the potential for loss of privacy to surrounding properties from the use of the proposed new external terrace at third floor level fronting Murray Street and Murray Mews. As outlined within the revised Event Management Plan; currently the 3rd floor has been designed as a reading room/library and occasional event and education space. Concerns have been expressed over there being a bar on or in the 3rd floor terrace area. We can confirm that there will be no bar in this area. As per current LIC facilities there will be a bar in the community café on the ground floor as well as a bar serving the main auditorium/first floor.

The roof terrace will primarily be used during daytime hours as a quiet outside space for reading and research associated within the adjoining archive/library. There is also potential for this space to be used by those attending events to be held occasionally within the archive/library. Such events would be limited in number and the type of events are envisioned to be literary events, book launches and ceremonies. The use of amplified music would not be permitted and the terrace would close by no later than 9pm.

Any potential for overlooking or loss of privacy to properties on Murray Street arising from the use of the terrace would be mitigated by the use of a deep parapet containing a skylight to ensure that the building users are unable to approach the building edge. The skylight, which runs along the length of the new white brick façade along Murray Street, also provides natural daylight, reducing the need for windows that would otherwise face neighbouring buildings.

Coffey Architects have also updating the terrace design to allow for additional planting along the Murray Street to further reduce any potential for overlooking. This has been submitted to the Council for consideration with the details of the terrace to be agreed through condition. It is important to note that the terrace is modest in size with a depth (beyond the proposed planters) which would range from 2m to 2.45m, thus restricting the number of people who could occupy the terrace at any one time.

In summary, the Application Scheme has been sensitively designed to ensure that no increased

opportunity for overlooking or loss of privacy to existing residents along Murray Street, Murray Mews and Camden Square can occur.

## **2. Impact on Camden Square Conservation Area**

Concerns have been raised that the development will have a detrimental impact on the Camden Square Conservation Area and its heritage assets.

In the first instance, it is recognised that the London Irish Centre is an established part of the Camden Square CA with the Conservation Area Appraisal itself stating:

*“the London Irish Centre with its Corinthian capitals (Nos 50-52), partially mirror the houses on the opposite side of the Square. The London Irish Centre has been greatly altered and expanded, including a glazed link and an overly-well lit access ramp.”*

A Built Heritage Statement, prepared by RPS, has been submitted in support of this application and assesses the effect of the Application Scheme on adjoining heritage assets in line with Paragraph 189 of the National Planning Policy Framework (NPPF, 2019). It rightly identifies that the nineteenth century properties of 50-52 Camden Square contribute positively to the character and appearance of the Conservation Area. These properties have therefore been retained and the façades and front gardens refurbished to enhance the character of the buildings on Camden Square.

The unsympathetic glazed building currently linking 50 and 52 Camden Square is proposed to be replaced with a new high quality link building that provides a more sensitive secondary entrance into the Centre from Camden Square. The primary entrance to the site will be relocated from Camden Square to Murray Street to provide a cohesive and legible main entrance for those visiting the LIC. As an historically commercial street, Murray Street is considered to be a more appropriate location for the main entrance than Camden Square, as advocated by the Camden’s Conservation Area Appraisal and supported by officers and the Design Review Panel in pre-application discussions.

Further to the above, it is proposed to upgrade the landscaping and boundary treatments around the site. A new therapy garden in the ‘front garden’ of No 52, at the junction of Murray Street and Camden Square, will re-instate appropriate soft landscaping and greening as a characteristic feature of Victorian villas in Camden Square. The reconfiguration of the external staircase to No. 51 and the provision of a continuous boundary wall along Nos. 51 and 52 will be designed to be private in nature and to align with the character & approach of the surrounding Villa’s on Camden Square. This amendment on the existing condition will clearly guide visitors to the new main entrance on Murray Street. It is important to note following discussions with the Camden Square Conservation Area Advisory Committee (CSCAAC); the height of the boundary wall has been reduced from 1.6m to 1.3m to allow views into the Therapy Garden and maintain the openness of the Square.

The LIC buildings along Murray Street (which include the Kennedy Hall) have been subject to a number of alterations and piecemeal developments throughout the 20<sup>th</sup> Century (owing to intermittent funding for the charity). As noted in the Built Heritage Statement this has resulted in a collection of buildings that present a disjointed vernacular as recognised in the Camden Square Area Appraisal and Management Strategy where they are classified as neutral buildings. The existing Kennedy Hall has little relationship with the 19<sup>th</sup> Century villas of No 50, 51 and 52 Camden Square, as evident in its contrast in brick and how it falls below the parapet height of the villas.

Comparably, the new building along Murray Street will be part three, part four storeys, with the top floor set back to minimise its visibility within the streetscene and match the parapet line of the villas. This will provide a continuous roofline along Murray Street and match the surrounding building

heights with the adjacent properties on the southern side of Murray Street and the Belvard Point development immediately adjacent.

The NPPF at paragraph 196 makes clear 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.

The proposals have been designed to enhance the London Irish Centre and its setting within the Camden Square Conservation Area. Since its establishment in 1954 the LIC has expanded on a decade by decade basis (funding dependent) which has resulted in a centre that externally is incongruous with the surrounding area. The proposals represent a unique opportunity to design a building which enhances the Conservation Area and deliver a fit for purpose, fully accessible community facility which will deliver considerable public benefits, in line with paragraph 196 of the NPPF.

### **3. Design Quality and Appearance**

Some of the local resident comments received on the application have centred on the design of the scheme and how it is perceived to be out of keeping with the surrounding area, thereby impacting on the character of the conservation area. Aspects of the proposed design that have been highlighted as being particular concerns are set out and addressed below:

#### *a) Design and Use of Therapy Garden*

Some local resident comments on the application have questioned the design and use of the proposed 'Therapy Garden' within the front garden of Nos. 51/52 Camden Square.

The existing area comprises small, sparse flower beds with large paved areas that are seen as uninviting and incongruous with the surrounding largely softer landscaped conservation area. The existing curved wall at the junction of Murray Street and Camden Square also currently hides a refuse storage area.

In contrast, the proposals for the new therapy garden seek to better integrate the site with the leafy character of the Conservation Area by re-introducing a characteristic feature of Victorian villas in the area, in the form of a fresh 'front garden' aesthetic at no. 52 Camden Square at the junction of Murray Street and Camden Square. The proposed new boundary wall has been reduced in height from 1.6m to 1.3m to allay residents' concerns and will enclose the therapy gardens thus providing a significant visual improvement at ground floor level.

The therapy garden will be directly accessed from the ground floor Wellbeing Centre within the LIC to provide a stimulating and engaging environment for community groups and provide occupational therapy for some of the Centre's older clients. Further illustrative information regarding the treatment of this space have been prepared by the project architects for the Council's consideration to demonstrate how the garden will enhance the Camden Square Conservation Area. Specific details relating to planting and landscaping will be agreed with the Council through condition prior to installation.

#### *b) Garden Boundary Wall*

The new boundary wall at the junction of Murray Street and Camden Square is proposed to include openings to provide access to No. 50, the external staircase at No. 51, the new link building and

therapy gardens. In response to concerns about the perceived excessive height of the proposed wall and access gates by local residents it has been agreed with Camden Council that the project architects Coffey Architects would prepare an updated elevation drawing that shows a reduction in the height of the wall and the gates from 1.6 metres to 1.3 metres. The design and materials of the wall and access gates will be controlled by a suitably worded planning condition from Camden Council but it is intended that the boundary treatment will be suitably perforate to re-inforce the character of the Conservation Area and be in-keeping with surrounding boundary treatments.

*c) Design for Stage Doors on Murray Mews*

It is recognised by the Council, the Metropolitan Police, local residents and the Centre alike that the existing environment around the stage doors entrance to the rear of the McNamara Hall on Murray Mews is unsatisfactory, unattractive and has led to instances of anti-social behaviour. The scheme proposals have therefore sought in the planning application to improve this environment by creating a more well-defined stage door entrance with a reduced number of steps to offer improved accessibility for service staff. The steps then lead to a high security gate and fencing which screens this back of house area to the rear of the McNamara Hall.

Concern has continued to be expressed by local residents, however, that the design of this new entrance remains unclear and that it may still attract anti-social behaviour. Clarification has also been requested as to the intended use of the entrance going forward.

In response, a further amendment to the stage door entrance design has been agreed with Council officers. As shown in the attached floor plan and images from Coffey Architects this includes moving the security gate to the street level so that it prevents access to the stepped area for non-authorised visitors. This also creates a more attractive framed entrance from the street, with increased space for deliveries, embellished by attractive lighting and bespoke signage to further enhance the active nature of this entrance. The updated drawings showing this amendment accompanies this submission to assist the Council in their determination of the planning application.

The amended Stage Doors design as set out in this letter will be considered a significant enhancement to Murray Mews and the surrounding Conservation Area in terms of character and safety.

In terms of the intended use of the Stage Door entrance, it will be primarily used as an entrance to the green room for artists (for instance musicians) as well as continuing to facilitate occasional deliveries associated with performances. As set out in the Transport Assessment accompanying the planning application, the majority of servicing for the proposed development will be undertaken from Murray Street, as per the existing situation whereby vehicles are permitted to load/unload on single yellow line located adjacent to the site.

The proposed redeveloped community centre is expected to generate a similar level of servicing movements to the existing situation and is not expected to have a material impact on the operation and environmental condition of the public highway.

In summary, the proposed scheme design has been subject to in-depth discussions with the Council, local stakeholders and residents. It has been carefully designed so that it is of a high standard of design and quality. The redevelopment will deliver a purposeful, modern building which respects the existing historic villas of No 50-52 Camden Square and enhances the McNamara Hall.

#### **4. Loss of Daylight/ Sunlight**

The loss of daylight and sunlight has been identified as a concern for residents within objection letters. The Daylight and Sunlight Assessment prepared by EB7 in support of the application did consider the potential impact of the Application Scheme on neighbouring residents in accordance with the requisite British Research Establishment (BRE) good practice guidelines and these results are summarised again below for convenience.

The report assesses the closest neighbouring residential properties with windows overlooking the proposed development at 49 Camden Square, Hillier House (46 Camden Square), 17 Murray Street and 5-15 Murray Street. It concludes that the proposals will achieve a high level of compliance and will have a low impact on the light receivable by neighbouring properties. The assessment identifies that 5-7 Murray Street and 11-15 Murray Street show full compliance with BRE Guidance with isolated areas of non-compliance identified which is commensurate with development in such an urban context.

As confirmed by findings of the daylight and sunlight assessment the proposed development will have an acceptable impact on the daylight/sunlight received by neighbouring properties and is compliant with the BRE method of assessment. It also should be highlighted that the BRE method of assessment is used as guidance only and results should be considered alongside all other benefits of the scheme proposal in the overall planning balance.

#### **5. Impact on Infrastructure and Highways**

Some of the local resident comments have raised concern about the potential disruption during the construction period and the impact of the proposals on the surrounding road network. Each of these concerns is addressed below:

##### *a) Construction Impacts*

Potential disruption from construction works is not necessarily a material planning consideration in the determination of the application. However, a draft Demolition / Construction Management Plan was nonetheless submitted with the planning application (see Appendix F of the Transport Assessment prepared by Caneparo Associates). This document remains in draft form as it is not possible to clarify the full details of the demolition and construction plan until such time as a contractor / site manager has been appointed.

However, the draft Demolition / Construction Management Plan does provide initial clarification and comfort in respect of a number of matters including

- Construction working hours (8.00am to 6pm on Monday to Friday, 8.00am to 1.00pm on Saturdays and no working on Sundays or Public Holidays);
- A commitment for the contractor / site manager to co-ordinate a community liaising group as a forum for residents to stay updated on the construction process;
- Full education for all construction workers and drivers delivering to the site to minimise potential risk to cyclists as well as pedestrians associated with construction movements in this busy area of London;
- Restriction of deliveries during peak arrival and departure periods to minimise conflict with the operations of the adjoining children's play centre on Murray Street;
- Clarification of the types of vehicles likely to be used to bring materials to and from the site;
- Strict delivery/collection scheduling and booking systems and the use of traffic marshals / banksmen to ensure that congestion is avoided;

- Instructions to site operatives to monitor site run-off and sweep any debris / spoil to be found on the footway surrounding the site;
- Temporary suspension of existing parking by phone bays on Murray Street to accommodate construction loading; and
- Erection of construction hoarding along the frontage of the site with footways surrounding the site being retained for the movement of pedestrians.

The appointed contractor / site manager will be directly involved in the preparation of the final CMP which will need to be approved by the Council in accordance with Camden Council's environmental health policies by way of a planning condition.

*a) Impact on Local Highways*

The proposed development will be car-free and will have a minimal impact on parking on the surrounding roads. The site falls within Controlled Parking Zone (CPZ) CA-N which operates between 08:30 and 18:30 Monday to Friday, with no restrictions in place Saturday to Sunday.

As demonstrated within the Transport Assessment the increase in capacity for the LIC will not necessarily result in an increase in the number of trips generated to/from the Centre. The LIC's current capacity is 1,000 people, with the maximum capacity of the McNamara Hall being 580 people. It is anticipated that the proposals would increase operational capacity to a maximum of 1,250 people (with the McNamara Hall capacity increasing to 690). This is of course the maximum operational capacity of the LIC at any one time and does not reflect the much lower number of users on a daily basis.

As demonstrated within the Transport Assessment the number of trips generated is expected to be similar to the existing Centre, with the majority of regular users from the local area therefore travelling by active modes of transport (5 bus routes within 640 metres of the site).

In relation to concerns about late night events and taxi drop off/pick-ups it is worth noting that the London Irish Centre is regulated by the Council's licensing department. The Centre has sought to extend the standard licenced hours with the granting of a Temporary Event Notice on only 16 occasions annually and this is not proposed to be increased following redevelopment.

The Travel Plan submitted with the application outlines the LIC's commitment to encouraging staff and visitors to use sustainable methods of transport to reduce the impact on surrounding public transport and the highway network. This includes the Centre's commitment to appointing a Community Centre Travel Plan Co-ordinator, who will be responsible for promoting staff/visitors to cycle and walk to the centre. The Travel Plan has been prepared in line with guidance by Transport for London (TfL) and will be reviewed annually. As confirmed in the submitted Transport Assessment, patrons of the Centre seeking to use using taxis are likely walk to Camden Road where there are more available.

The redevelopment will also deliver a significant uplift in on-site cycle parking from 16 existing spaces to 52 spaces (44 short-stay and 8 long-stay). This exceeds current London Plan cycle parking requirements and will actively encourage the use of more sustainable transport in comparison to the existing centre.

Delivery/Servicing will remain as existing with loading and unloading taking place on the single yellow lines on Murray Street and paved inlet on Murray Mews. The redevelopment is expected to generate a similar number of servicing movements to existing. Servicing vehicles are likely to be light panel vans commensurate with commercial deliveries.



In summary, the Application Scheme is not anticipated to result in an unacceptable pressure on the local public transport or highways network nor will it result in an increased demand for car parking within the area. A Travel Plan will be put in place by the London Irish Centre and will encourage visitors and staff to use sustainable methods of transport, taking advantage of the established public transport network.

## 6. Noise Pollution

It has been suggested in some representations that the increase in the size of on-site event space will result in increased noise pollution and disturbance, particularly late at night. It should be noted 79% increase in useable space previously quoted is incorrect and the net increase in floorspace is 53%, this relates to total floorspace over the whole development and includes office floorspace (for charity employees), counselling rooms, kitchen facilities and floorspace used for servicing purposes only. As outlined in the table below this figure does not relate solely to usable event floorspace.

SPACE DESIGNATED USAGE (square meterage)							
Area	1-Core	2-Office	3-Care	4-Community & Culture	5-Events	Current total	Future total
<b>TOTALS</b>							
<b>Current</b>	1583	325	34	264	809	3015	
<b>Future</b>	2204	295	481	508	1117		4605
<b>Increase/Decrease</b>	+621	-30	+447	+244	+308		
<b>Key</b>							
<b>1 - Core</b>	Plant, toilets, circulation, internal walls, lifts and stairs, kitchen and reception						
<b>2 - Office</b>	LIC and tenant offices						
<b>3 - Care</b>	Advice and welfare and wellbeing provision						
<b>4 - Community and Culture</b>	Museum, community café, the residence						
<b>5 - Events</b>	Space for events (exams, hire, weddings, gigs, conferences)						

It is evident from the table above that the majority of new floorspace created will be to meet the care, community and cultural needs of the LIC, alongside significant improvements to accessibility through the provision of a new centralised core. The uplift in floorspace catering to events is a mere 308sqm above that within the existing building and overall will amount to only 24% of the floorspace within the new development.

One of the primary failings of the existing London Irish Centre is the poor internal arrangement in terms of circulation bottlenecks and the inability to slow the departure of patrons from the building at the end of an event. The building has limited overflow spaces for visitors to wait in following an event and so they have limited options but to spill out onto Camden Square. The scheme proposals have sought to specifically address this issue through more generous internal circulation and gathering spaces.

The new main entrance on Murray Street will lead into a large community hub area at ground floor and mezzanine level above. These areas will be used as holding spaces following meetings and events, with the community hub at ground floor level providing seating adjacent to the reception area which will be used as waiting areas for visitors. These areas have been designed to reduce overspills and will ensure a slow and steady flow of visitors leaving the LIC.



A Revised Draft Events Management Plan (EMP) has been submitted in support of this application and outlines the current event management issues as a consequence of the existing building. It highlights that the Centre is primarily (75%) used during daytime hours for activities such as lunch clubs, nurseries and music clubs. As highlighted earlier the number of late night events at the LIC is limited to 16 per year. The EMP includes a commitment from the LIC to ensure that venue management and security will be pro-active in keeping noise levels to a minimum and encourage guests to leave the area as quietly and quickly as possible. Printed material will be available and readily displayed showing all main transport links.

The above design and management measures are considered to contribute greatly to a much reduced potential for local loitering and disturbance for local residents arising from any activities at the Centre.

## **7. Removal of Trees**

A number of representations raised concerns about the potential for loss of trees along the Application Site boundary at Camden Square and Murray Street as a result of the development. The approach to the redevelopment is to retain as many trees as possible; this includes protecting the Lime Tree in the front garden of No. 50 Camden Square tree which has a Tree Preservation Order attached to it (TPO reference C10-T89).

An Arboricultural Impact Assessment and Method Statement has been prepared by ACD Environmental and outlines the tree protection plan during the redevelopment. It identifies trees on the highway adjacent to the London Irish Centre which need to be removed to enable the works to be carried out in as safe a manner as possible. The Arboricultural Statement demonstrates that three of the trees (two on Murray Street and one adjacent to the existing entrance on Camden Square) are Category C trees, meaning they are of reduced quality and value with only limited wider landscape significance and a reduced life expectancy. The one remaining tree is a Category B Maple Tree (located next to the entrance on Camden Square) which would be removed subject to the agreement of the local authority.

The removal of the trees identified within the application is necessary to facilitate the redevelopment scheme, which includes the positive creation of new entrances on to Murray Street and Camden Square. Opportunities exist to replant trees with the same or higher Capital Asset Value for Amenity Trees (CAVAT) to enhance the surrounding Conservation Area. These trees would be chosen for their ability to grow quickly, increase legibility for pedestrians and establish a new sustainable boundary screen after a few years. Details of tree protection, landscaping and the re-planting of trees of a similar or higher CAVAT value can be secured by way of planning condition.

## **8. Impact of Basement Works**

The planning application includes proposals to enlarge the existing single storey basement on the site below the new building on Murray Street only. No basement works are proposed under the villas of Camden Square or McNamara Hall. The enlarged basement will provide additional multi-functional space for the Centre and its visitors.

Residents have queried whether the new basement will have a structural impact on neighbouring properties and also potentially impact the railway line beneath the McNamara Hall. A Basement Impact Assessment (BIA) has been prepared by Soil Technics and submitted with the planning application. This assesses the potential damage to adjoining properties, local infrastructure assets and the existing railway tunnel. As demonstrated with the BIA the potential damage to neighbouring buildings would not exceed Burland Category 1 (no more than 'very slight damage') which is fully in

accordance with the requirements of Camden Planning Guidance on basement construction.

Props and support structures will be used during the construction stage to ensure that the enlargement of the existing basement is in accordance with the BIA and Camden Councils requirements.

The railway line which runs underneath the McNamara Hall will be unaffected by the redevelopment. Works to the McNamara Hall include façade alterations only (above ground works) and will not include basement works. The McNamara Hall lies on a concrete slab above the railway tunnel and this will remain unaffected by the proposals. The Basement Impact Assessment confirms that no impact on the railway tunnel will result from enlarging the existing basement.

In summary, the basement works will have no structural impact on neighbouring residential properties, the railway line, or the retained elements of Nos 50-52 Camden Square and the McNamara Hall.

We trust that the above response is helpful and addresses the concerns raised during the public consultation process of the planning application process. Should you wish to discuss the content of this letter, please do not hesitate to contact the undersigned.

Yours sincerely

*Helena Burt*

For and on behalf of  
Rolfe Judd Planning Limited

cc  
Siofra Boyd

Rolfe Judd Planning Limited