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RE: OBJECTION to Camden Goods Yard Morrisons Superstore and Petrol Filling Station Chalk Farm Road London NW1 8EH (2020/3116/P)

Overview

The original scheme (2017/3847/P) was very poor and did not properly support the requirements of Camden's own Development Plans for the area. The original approval allowed huge overdevelopment with poor access routes for pedestrian and cyclists, poor public realm spaces that are mainly in shade and a lack of consideration of the areas to either side of it.

There was enormous opposition from local residents who were in favour of high quality and well considered redevelopment of the land. The developer is now seeking to increase the number of units on the site, which requires raising the height of the majority of the buildings previously approved, reducing the size of the internal courtyards of the residential blocks and removing an additional 15 trees.

The current situation in the area is that we already have hundreds of empty flats in Hawley Wharf, including those operated by Origin Housing. The impact of Covid-19 suggests that people would prefer lower rise buildings that they can walk up and down the stairs of, high quality outside space and public realm. Many are looking to relocate to less dense and less expensive locations outside London now that they are no longer required to attend their office every day.

Proposed Variations

The developer claims repeatedly that "the increased heights are not significant" but that is not borne out by the facts and the proposed variations are not an 'improvement' as suggested.

Block A1, increased from 14 to 15 storeys and one metre higher

Block A2, increased from 11 to 12 storeys and 1.6 metres higher

- Block B - increased from 7 to 8 storeys by 1 storey and 2.8 meters – with external rainwater downpipes – cheaper construction but not a design improvement

The aerial view of this block (Page 38) shows projecting balconies within the courtyard, but there is no indication of these on the plan (Page 34). It has also been decided to introduce exposed rainwater downpipes (Page 43) on an 8 storey building.

- Block C – increase 10 to 11 storeys and 1 meter with one area increasing by 8 to 10 storeys and 4.7 metres. The perspective of this block shows the specially designed pigeon nesting areas, between the introduced "roof" of one balcony and the floor of the one above.

- Block E1 – increase by 2.4 meters

- Block F – increase in 2 storeys shown on Page 72, North elevation, is dramatically worse with the apparent 2 storeys on the left hand side.

The variations add locations for pigeons to nest and inhabit. There must inevitably be a reduction in the quality of some spaces to allow a storey increase within a 1 meter height increase, external rainwater pipes and single escape stairs. Not one of these items is an improvement.

Sunlight and Daylight

There is little evidence provided to demonstrate how the alterations to the blocks will affect neighbouring properties.

The original approved plans show that light could be reduced by up to **60%** for some existing residents. From the new application or the report in Appendix 10.4 has no reports as to whether the changes in height for Blocks A, B and C would have any impact on the daylight and sunlight for existing homes in the surrounding area.

We need to have daylight and sunlight reports for those homes worst affected by the consented scheme to ensure their loss isn't increased due to the added heights or other building changes further to the consented scheme.

Conclusion

The variations suggested are making an already poor scheme worse. An additional 71 units will increase the density of an already dense scheme. Local residents are not in favour of these variations and we would ask you to refuse this application in full.

Additional comments: Health and Safety

Lift - safety post Covid 19

How will the developers allow for social distancing in lifts?

Although Building Regulations are entirely separate from Planning Approval, this point should be considered. Immediately following the Grenfell Fire with 72 deaths the RIBA set up an Expert Advisory Group.

In October 2017 it made a report to the Independent Review of Building Regulations and Fire Safety. The main clause regarding residential buildings reads as follows:

"In all new multiple occupancy residential buildings, a requirement for at least 2 staircases offering alternative means of escape, where the top floor is more than 11 metres above ground level".

All of the blocks in this development have residential units above 11 metres, yet none of the blocks has a secondary staircase. Regardless of the fact that the Building Regulations have not yet been modified, the existing scheme contravenes the specific guidance of their professional Institute.

Given the current situation with Covid and the horrific example of Grenfell Tower it seems an extraordinary oversight for these blocks not to contain a secondary stair for escape and also for access and egress during viral outbreaks. This may not be a planning issue but is approved is harder to remedy later.

The poor quality design of these proposed buildings really are, are best illustrated on Page 73. In addition we do not believe that the scheme you have already approve is either safe or of high quality and should be reviewed if there is a mechanism for doing so.