

**OBJECTION to planning application number 2020/3737/P - 248-250 Camden Road NW1**  
John Southall & Marcia Ross-Southall 84 Camden Mews

We object to this planning application, 2020/3737/P

We are residents of 84 Camden Mews directly to the rear of the hostel and proposed new development at 248-250 Camden Road

We fully support the idea of providing temporary accommodation to homeless and vulnerable people within LB Camden. However, we believe that this scheme is an overdevelopment of the site.

We object to this proposed development because of:

- The detrimental impact it will have on the Conservation Area
- The loss of amenity to our property and the loss of the views above rooflines
- The severe overlooking and loss of privacy to the surrounding properties
- The massing, scale and size of the proposed development
- Light pollution
- Noise
- Loss of green space, biodiversity
- Community division
- Community involvement

Our objections:

**(1) Detrimental to the Camden Square Conservation Area and contravenes Camden Local Plan.**

Any new scheme should be assessed in accordance with the Conservation Area Appraisal Plan and any new building should positively contribute to the Conservation area. This scheme does not enhance and is detrimental to the character of the Conservation area.

The Conservation Area Appraisal Plan identifies the characteristics of the area:

*2 Definition of Special Character*

*The green spaces and the private gardens are important as they make this a green and leafy area - an attractive yet urban place with an underlying mature landscape.*

*Key views*

*5.2 Glimpsed views of gardens:*

*An aerial photograph of the area shows how green it is when taking the private gardens into view. The gardens are most visible at the corners of streets, where the gardens run parallel to the side street. At this point, trees and shrubs appear and give a green and important break between buildings. These are vulnerable places as development may reduce these green gaps and erode the views across the gardens. Gardens are also visible between semi-detached villas, providing a glimpse into the gardens beyond.*

*5.8 Private rear gardens quietly add to the quality and biodiversity of the area. The gardens are almost all hidden from the street, glimpses to green space hidden behind and between buildings are precious and add to the quality of the area.*

The Camden Local Plan identifies key considerations and recommendations:

*7.46 We will seek to manage change in a way that retains the distinctive characters of our conservation areas and will expect new development to contribute positively to this. The Council will therefore only grant planning permission for development in Camden's conservation areas that preserves or enhances the special character or appearance of the area.*

*6.38 We will seek the retention of important views. Spaces above rooflines, gaps between buildings and even small, sometimes isolated pockets of amenity space, can be vital in supporting the notion of openness, provide visual interest, soften the built environment and contribute to wellbeing.*

*Mass and Scale – design appropriate to location*

*2.14 Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers*

*7.2 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:*

- character, setting, context and the form and scale of neighbouring buildings*
- the character and proportions of the existing building, where alterations and extensions are proposed*
- the prevailing pattern, density and scale of surrounding development*
- the impact on existing rhythms, symmetries and uniformities in the townscape*
- the composition of elevations*
- the wider historic environment and buildings, spaces and features of local historic value*

*7.4 Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Character is about people and communities as well as the physical components.*

*7.5 Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions.....*

Camden Road comprises 2 & 4 storey semi detached villas built in mid 19<sup>th</sup> Century, lining the sloping road from South to North.

The adjoining properties 246 and 254 Camden Road and the new development at Ashton Court follow these lines. The rooflines follow the slope of Camden Road.

Camden Mews directly to the rear (which is acknowledged as a historic mews and the longest mews in London) has not been taken into account in the existing building assessment in the Design & Access Statement

The proposed development is 6 storeys, a full 2 storeys above this roofline. The rear access decks and stair/lift tower rise up to 6 storeys and are proposed to be built in the rear garden area along with two single storey not insubstantial additional buildings removing the quality and

distinctive character of the Conservation Area, referenced in the Conservation Area Appraisal Plan.

This contravenes section 7 of the Camden Local Plan.

## **(2) Loss of Amenity:**

*Camden Local Plan 6.38 We will seek the retention of important views. Spaces above rooflines, gaps between buildings and even small, sometimes isolated pockets of amenity space, can be vital in supporting the notion of openness, provide visual interest, soften the built environment and contribute to wellbeing.*

When viewed from Camden Mews the proposed 6 storey development will be inconsistent with the sloping roofline of the semi detached villas to Camden Road and protrude two full storeys above this.

The rear elevation of access decks & stair/lift tower rising 6 storeys and the height and mass of the development will remove the view we currently enjoy of the canopy of plane trees that rise above the roofline of the existing hostel and the sky and sunsets.

The importance of wellbeing has been significantly highlighted with the current pandemic and lockdowns. The loss of this amenity will have significant impact.

We also look out onto the trees in the existing garden - the removal of the grade B whitebeam tree (which is likely to become grade A within a few years) will lose the amenity of partial screening and privacy between the properties.

## **(3) Overlooking and loss of privacy**

*Mass and Scale – design appropriate to location*

*Camden Local Plan D1 Design 2.14 Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers*

The 6 storey access decks and stair/lift tower of the proposed development built into the rear green space/garden, creates an overbearing dominating effect and loss of privacy and overlooking to neighbouring properties detrimental to their enjoyment of their properties. It will seriously harm our aspect from our top floor living space and roof terrace as the residents of the hostel are encouraged as described in Design and Access Statement to meet, chat and also occupy these decks while ‘supervising the children in the playground below – 6 storeys! Also the Design and access statement illustrates usage in this area with people hanging over the landings of the 6 storey stair tower.

From Camden Planning Policy:

*‘The distance between windows in buildings as a guide is 18m. However if there is a difference between building heights this should be increased.’*

Camden Mews is 2 storeys and this proposal is 6 storeys. Also the open 6 storey stair/lift tower is considerably less than 18m and overlooks the neighbouring gardens and living spaces.

In the Design & Access Statement where they reference ‘buildings in road a couple of streets away’ the Camden Planning Guidance (March 2018) however does not state that is acceptable but rather suggests ‘if in the immediate vicinity’ – i.e. a particular street or square.

Camden in their policy confirms that they expect development to protect the privacy of the occupants of both new and existing dwellings to a reasonable degree.....’therefore carefully designed to avoid overlooking and extent of overlooking assessed on case by case basis’.

Again the removal of the whitebeam tree (see (2) above) will exacerbate the loss of privacy and overlooking.

#### **(4) Massing, scale and size of the proposed development**

*Camden Plan 2.14*

It is 2 clear storeys higher than surrounding properties on Camden Road. It blocks the sky for residents on Camden Mews and further afield in North Villas. In Camden Mews it will create a sense of enclosure and claustrophobia. The walkways and stairway extend out from the existing footprint of the building, significantly increasing the true footprint of the building.

Access decks and stair tower to the rear of the proposal are alien to and have no precedent within the Conservation Area

(NB: The building 252 Camden Road appears higher than existing hostel building and 246 Camden Road because the road slopes downwards towards Camden Town – it is not actually higher than existing hostel building)

Furthermore, a major point to note is contained within the Design & Access Statement:

*Site analysis and our user-focused design ethos naturally led to our consideration of the proposed building as experienced at two distinct scales;*

- *At an urban scale, the building is primarily viewed at an acute angle and as part of a kinetic experience as one moves along Camden road – we therefore considered its massing and impact from this point of view*
- *At a human scale, we designed from the perspective of the vulnerable families for whom the building will provide a temporary sanctum*

Apart from the urban scale being inconsistent with the surrounding buildings on Camden Road it completely ignores the scale as it affects the rear of the scheme predominantly to Camden Mews.

Rochester Sq Conservation Area have also commented in their response to this application:

*The applicants' claim that, 'In order to meet the brief we have to provide sufficient units of temporary accommodation for Camden's homeless families', is specious.....The brief should match the capability of the site. On this site, the maximum height is four stories with a flat roof or three with a pitched roof.*

#### **(5) Light pollution**

*(see Camden Local Plan Policy A1)*

To ensure safety, walkways and stair tower will have to be lit during hours of darkness.

This will create significant and unacceptable light pollution in an area normally dark enough to allow local residents to sleep at night. Our bedroom window faces the hostel.

There is no evidence that the developers have followed either the guidance (2018) or the Local Plan (2017) and provided detailed plans of how the walkways and stair would be lit. This breaches the Camden Local Plan.

Issues of light pollution are designed into the current proposal while there are rear 6 storey external decks and a 6 storey stair/lift tower so close to neighbouring homes. The levels of light required for this scheme cannot effectively be mitigated.

## **(6) Noise**

Design and Access Statement part 3 shows images of residents standing and looking over the decks' balustrades, sitting, smoking and chatting. This is a proud inherent characteristic of the proposed design. They are shown leaning over the 6 storey stair/lift tower at the centre of the previous green space between Camden Mews and new Hostel.

There is fixed seating on the decks and the proposal states:

### *The Deck and Stairs*

*"...create opportunities for residents to engage with each other and enjoy views into the rear garden. It is proposed that a small section of the deck is allocated to the units to provide additional living space where residents can sit and have a chat with neighbours."*

This emphasises the benefits of the decks as places for residents to hang out and socialise. This severely compromises the privacy of neighbours and will create continual noise; noise carries very easily across this space. Even without socialising the use for access will create inherent noise. There is no evidence of consideration of the impact this would have but is detrimental to characteristics of the Camden Square Conservation Area.

## **(7) Loss of green space, biodiversity**

### *Conservation Area Appraisal S.7.11 Rear garden spaces*

*Development which results in the loss of private open spaces is unlikely to be acceptable if it is considered to harm the contribution of these spaces to the character and appearance of the conservation area.*

### *Camden Local Plan 6.37*

*Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area. The Council will protect such spaces in accordance with paragraph 74 of the National Planning Policy Framework. Gardens help shape their local area, provide a setting for buildings, provide visual interest and may support natural habitats. Therefore they can be an important element in the character and identity of an area (its 'sense of place'). We will resist development that occupies an excessive part of the garden, and the loss of garden space which contributes to the character of the townscape.*

Over 50% of the open green space will be eroded to the rear of 248 -250 Camden Road by constructing a 6 storey stair and lift tower, two single storey freestanding buildings and hard play and access to these buildings and structures. This contravenes the Camden Square Conservation Area Appraisal Plan and Camden Local Plan.

The removal of the grade B whitebeam tree (which is likely to become grade A within a few years) will be a loss of the natural habitat and visual greenery.

## **(8) Community division and Vulnerable People:**

### *Camden Local Plan 7.4*

*Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Character is about people and communities as well as the physical components.*

### *Camden Local plan A1*

*“We will seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities”*

*“there have been problems in the past where supported housing facilities such as homeless hostels have been too large or have been clustered together, becoming a focus of antisocial behaviour. A concentration of people who have high support needs can unbalance the social mix in an area, create noise and disturbance and damage the amenity and quality of life for other local residents and visitors”*

This area enjoys a diverse community comprising a mixture of rented and owner-occupied properties; local authority housing, sheltered housing and various hostel residences. Local residents have always supported the idea of providing temporary accommodation to homeless and vulnerable people within LB Camden and indeed supported the initial smaller development proposed in the July 2019 consultation. We understand the rationale behind the increase in size of the original smaller units especially as it is likely that the occupants will be there for around 2 years (and maybe longer if the history of the Englands Lane hostel is anything to go by) but sadly the design and density of this proposed development is far too large and insensitive and goes against the Camden Local Plan.

### **(9) Community Involvement/Consultation**

The submitted Statement of Community Involvement (SCI) is not a true representation of the consultation with the community:

The first consultation in July 2019 was for a completely different scheme by another firm of architects – Architype, with reduced number of storeys, internal access and no external decks and access tower – evocative of a ‘pair of semi detached brick villas ‘ mirroring the type of buildings along Camden Road and in keeping with the Conservation Area. This also contained the following statement:

#### **Overlooking**

*The building will be carefully designed to ensure it does not create additional overlooking issues and does not further impact the privacy of existing homes. This will be carefully considered as the design develops.*

Accordingly, residents did not oppose this scheme.

The second consultation letter from Camden dated 26 May 2020 only arrived at most neighbouring properties during week commencing 15 June 2020 - giving until 19 June 2020 to submit comments on the proposal. Contrary to what is stated in SCI S.4 c) this letter said that there would be no public consultation meeting due to Covid19. We note that this letter confirming the lack of a meeting (unlike the 2019 letter) is not included in the SCI. The online meeting of 17 June 2020 was only hastily arranged at instigation of residents of Camden Mews after approach to Councillor Danny Beales.

The record of 12 participants logging into the event was taken from the saved chat but this was saved after participants had left the meeting. A more accurate number would be 17 plus 2 architects, 2 Councillors and 2 Camden Council representatives. Most residents logging on had 2 people at each computer – if this were a meeting headcount this would be considerably more than 12. The recording of this meeting is accessed by the link given in SCI 4 c)

At this second consultation meeting the first design and its development was not given in context to the design presented. It became apparent a day or so after this meeting that the scheme had changed fundamentally and radically subject to a change in brief from Camden Council which had led to a completely new scheme being presented by different architects Rcka. This was not

a second consultation on the development of the original proposed scheme and was in effect a first consultation.

The SCI states:

*4 c) Detailed response from residents*

*after the online consultation, a written response and suggestions for changes was sent on behalf of Camden Mews residents.*

*Appendices: 5. Resident response:*

*Submission on behalf of Camden Mews residents sent by John Southall*

This is misleading and not correct as the response was never held out to be sent on behalf of anyone other than ourselves. We are aware of many more responses submitted to Camden by other residents which have not been mentioned or included.

#### *5. Conclusion*

*Consultation with the public and with those residents who live around the proposed redevelopment is an integral part of the pre-planning application process. The team has proactively engaged with residents, councillors and organisations in the area.*

See:

*Design & Access Statement*

*Executive Summary*

*A total of 4 Pre-application meetings were held with Camden since June 2019, along with 2 Public Consultations and 2 formal Design Review Panel meetings. The final Pre-application meeting in April 2020 concluded that the design team had responded adequately to all Design Review Panel comments.*

The final Pre-Application meeting was April 2020. The second public consultation meeting presenting a completely different scheme for the first time took place in June 2020 only after instigation by the local residents. How can this be a 'Proactive engagement with residents' as stated in SCI conclusion para 5? This is an additional fundamental flaw in the consultation process and illustrates the lack of intention to proactively engage with residents.

To summarise this section:

1. The inaccuracy of the SCI is misleading, selective and not a true representation of the facts
2. The first public consultation was a completely different scheme to the second consultation scheme – a fundamental flaw of process
3. The online meeting was instigated by residents not an invite contained in letter from Camden.
4. The representation of our written public response (John Southall) is incorrect as other responses are not included and no doubt were different.
5. The timeline in the Design & Access Statement of the development of the scheme itself highlights the flawed consultation process