
From: Marfleet, Patrick
Sent: 02 February 2021 13:02
To: Planning
Subject: FW: Planning Application 2020/5647/P - Response from Camden Town CAAC

Please upload to the above.

Thanks

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Senior Planning Officer

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The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

Subject: Re: Planning Application 2020/5647/P - Response from Camden Town CAAC

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Mr. Marfleet,

My apologies that the Committee has been unable to discuss this application until our virtual meeting earlier this evening. I very much hope that you will accept the following response despite this slight delay.

The Camden Town Conservation Area Advisory Committee objects to this application for a number of reasons. We also object to such major changes being proposed via a "variation and removal of conditions" application. We believe that changes are too great for S73 consideration, and that the applicants must be required to make a full planning application to ensure that the proposals are considered fully with concomitant requirements for a detailed environmental report and greater level of detail for the proposed changes to the facade designs and northern light well design.

The proposed major changes to the primary facade on Bayham Street, under the auspices of a Camden "warehouse aesthetic", cannot be supported. We consider that proposed elevational alterations, namely the decrease in window size, considerably further weakens the design quality of the facade. The adjacent recessed panels are an attempt to disguise this and overall this change will result in a toy-town sham "warehouse" appearance exacerbated by the flat window framing which now appear to be single fixed lights and therefore unopenable. This is not acceptable in what could be a predominantly naturally ventilated building.

Whilst we do not object to the omission of one of the front light wells, the introduction of a replica 'carriage drive' arch in order to provide separate access for the office use is not considered appropriate from a design perspective as it creates a false history for the site, and is a pastiche.

Separating off the different users of the building in this way also results in the hotel element having a large space that could be used for a self-contained bar / restaurant area in what is a predominantly residential road. The previous iteration of the plan created more of a joint reception / lounge area, open plan with other functions, and therefore less likely to be able to be utilised in this more intensive way. This is detrimental to the local amenity and cannot be supported. If the Council are minded to approve this aspect of the proposals the permission should be conditioned to prevent the ground floor area from being used by anyone except for guests at the hotel.

The revised northern light well is crammed with stairs which now rise all the way up to roof level. The photographs provided of similar installations do not show such a tight external space, and certainly don't replicate the amount of external stairs and walkways that this space is proposed to house. It is also unclear whether the entrance passage to the office part of the proposal which crosses this is covered over or remains external at this point. The net effect of all these changes is to create a potentially excessively noisy external environment, with the opportunity for too much activity adjacent to the small scale residential buildings to the north which also have external amenity spaces facing into this area. We cannot see how there will not be a major loss of privacy and residential amenity for buildings to the north of the site, despite assertions otherwise.

We note too that the presence of the external stairs at roof level will appear as a utilitarian afterthought and will be visible in longer views (in particular southwards along Kings Terrace and Bayham Street). The stair is considered detrimental to the visible shift in scale between small mews houses and the taller buildings within this block and should be provided internally within the existing envelope. We are unable to comment on the visual effects of the plant room shielding as insufficient information has been provided.

The proposed omission of the green wall for fire safety reasons must be evidenced. A green wall does not require a combustible facade build-up and we cannot see how removing this condition is justifiable in a climate emergency.

The introduction of 10 basement level-2 hotel rooms only 6 of which have tiny windows into what will be a very occluded north facing lightwell provides an unacceptable quality of accommodation. The Committee would like further explanation of the the following which is included in the MEP statement: "The design of the building doesn't just include for residential sleeping within the hotel but also occupied basement sleeping areas."

MEP/servicing strategy: the Committee is concerned to see the proposed location of a substation and emergency generator immediately adjacent to residential properties on Kings Terrace. Full assessment must be provided to show that there will be no detrimental impacts from these uses in this location. The proposed use of high output air source heat pumps on the roof to provide all hotel hot water requirements appears to be highly optimistic (in addition to potentially extremely noisy), and there is genuine concern that the generator will be end up being required to provide additional HW capacity when the ASHPs fail to provide a sufficient increase in temperature. We note that the proposal to use the ASHP in split mode is likely to mean that for the majority of the time the units will be run to provide cooling (air conditioning) and a modern building such as this should be designed to have openable windows and a requirement to use natural ventilation.

The applicant must be required to fund a Council appointed MEP consultant to review the proposed strategy to confirm that it is fully viable and will not have detrimental impacts to the immediate local environment (via increased noise, lower air quality, and insufficient EMF shielding to the poorly located UKPN substation). We note that Camden already requires applicants to funding independent checking of BIAs and a similar need is seen here for what appears to be a very different and more highly intensive MEP strategy to that proposed in the previously approved plans.

kind regards

Luisa Auletta
on behalf of the CTC AAC