

PLANNING APPLICATIONS
in respect of
CAMDEN LOCK VILLAGE (HAWLEY WHARF)

Planning Submission Representations by the
HAWLEY WHARF WORKING GROUP

10th November 2011.

HWWG MEMBERS:

Councillors

Cllr Patricia Callaghan,

Cllr Christopher Naylor,

Cllr Matthew Sanders,

Residents Associations

Camden Gardens Residents Assn.

Camden Town Speaks Residents Assn.

Clarence Way and Castle Road Tenants & Residents Assn.

Harmood, Clarence & Hartland Residents Assn.

Hawley Residents Assn.

Prouse Place + Ivor Street Residents Assn.

Tiptree Barling and Havering Tenants & Residents Assn.

Community & Heritage Interest Groups

Castlehaven Community Centre

Regents Canal Conservation Area Advisory Committee

Camden Railway Heritage Trust

Camden Town Community Forum

Camden Town Safer Neighbourhoods Panel

Business Interests

Business occupiers within the development

EXECUTIVE SUMMARY AND CONCLUSION.

HWWG welcomes:

1. The use of the buildings and the design character of the buildings on site D.
2. The inclusion of local retail space in site C.
3. The use of the upper levels on site C.
4. The inclusion of an "Everyman" type "art house" cinema on site C.
5. The scale and bulk of the buildings fronting the main Hawley Road.
6. The continued use of the arches to the south of site B, and accessed off Kentish town Road for B2 general industry and other similar type sui generis employment uses.
7. The refurbishment and use of 1 Hawley Road, as part of the school, if the school were to be included in the scheme.

HWWG has reservations about:

1. The inclusion of restaurants at high level in site A without adequate sound-proofing and surrounded by public open space that is open at all hours.
2. The lack of an adequate green travel plan to deal with the increased cumulative impact on the local transport infrastructure.
3. The increase of height of site D by one storey.
4. The lack of any coherent vision for the commercial uses on site C and the loss of the opportunity to create a coherent mixture of uses that are to the benefit of the local community.
5. The lack of further design development of the local retail space in site C in order to ensure its viability.
6. The length of Building C1, its relationship with the street + landscaped square opposite, and the inclusion of an additional route past its eastern end to serve the interior of site C.
7. The design character in principle of the buildings on site C, and the detailed development of the design character of the interior building on site B
8. The servicing of the industrial units on site B.
9. The adequacy of the size and suitability of the site given for the use of the school without further detail being available as the application is in outline form only.

HWWG has strong concerns about:

1. The lack of adequate degree of separation between the development and the canal towpath on site A.
2. The use of floors above the 1st floor for market retail use on Site A
3. The inclusion of a large amount of hot take-away food establishments within the market retail space on site A.

4. The design character of the buildings on site A.
5. The height of Building C1.
6. The very low (5%) affordable housing provision, notwithstanding the provision of the school. HWWG is strongly in favour of the development meeting the 50% affordable housing target.
7. The combination of the height and bulk of the interior triangular building C1 on Site B.
8. The lack of designated affordable employment space to support local and creative industries business in site B and the lack of commitment from the developer to offer businesses that exist on the site equivalent tenancies within the new development on reasonably affordable terms.
9. The lack of adequate daylight/ sunlight to some of the lower level units in the interior residential building on Site B.

HWWG is fundamentally opposed to:

1. The inadequacy of the public open spaces in site C.
2. The height and bulk of Building C2.

HWWG is concerned that the grant of any consent would be in fundamental disregard to adopted policy and national guidance.

National Guidance on the Use of Section 106 Agreements.

HWWG is concerned that, if Camden granted consent to a scheme incorporating a S106 Agreement that involved a financial trade-off between the provision of a school and the consequent reduction of affordable housing, it would – in effect - not be complying with national planning guidance in Circular 05/2005.

The Facts

The Council have apparently encouraged the developer to include the school in the development. It seems to be accepted by both Camden and the developer that the inclusion of this school, at a reported cost of about £8m, is in lieu of the provision of affordable housing; given that there are only 9 affordable housing units out of 176 residential units (25 affordable habitable rooms in a total of 502 habitable rooms).

The documents do not appear to assess how many children would live in the development. Although there are 98 no 2 bed units, it is frequently the case that 2 bed units are used by adults sharing a flat. Camden policy defines a family unit as being of 3 bed or more, and there are 21 bedrooms in such family units in the development. It is assessed that this development would accommodate perhaps 1 or 2 children within each year of primary school age who would need to use the school.

This amount is very minor in the context of the overall need for a new primary school. As has been explained by Camden Head of Planning, the strong need for these school facilities has long pre-dated the consideration of this development. The needs of the development are small compared with the far greater pre-existing need.

The National Guidance

Circular 05/2005 reaffirms that Section 106 Agreements are “*intended to make acceptable development which would otherwise be unacceptable in planning terms.*” It also reaffirms that: “*One of the fundamental principles of planning obligations is that they should not be used to enable developers and local planning authorities to buy or sell planning permission. It is therefore not legitimate for unacceptable development to be permitted because of benefits or inducements offered by a developer which are not necessary to make the development acceptable in planning terms.*”

Circular 05/2005 requires that planning obligations may only be sought where they meet all of the following tests:

- *relevant to planning;*
- *necessary to make the proposed development acceptable in planning terms;*
- *directly related to the proposed development;*
- *fairly and reasonably related in scale and kind to the proposed development; and*
- *reasonable in all other respects.*

Should the S106 Agreement include the obligation on the developer to provide a school and if, in its consideration of the acceptability of a 5% affordable housing provision in the context of a 50% target for such provision, Camden took the school into account as a material consideration which outweighed the complete failure of the development to comply with adopted policy for the provision of affordable housing, so as to conclude that the school made acceptable what would otherwise be unacceptable, then Camden would be in flagrant disregard with National Guidance.

Adopted Policy

The inclusion of the school in place of housing is in complete disregard to key Camden policies:

- The Core Strategy affirms that housing is the number 1 priority land use to be encouraged in the borough. It further reaffirms the particular importance of affordable housing in the borough.
- The development is in disregard to the vision for Camden town enshrined in Policy CS7.
- The site development brief, the Hawley Wharf Planning Framework, which was adopted as recently as February 2009 nowhere mentions that this site may be used in part for a school.

CONCLUSION + RECOMMENDATION

HWWG strongly supports the principle that this site should be developed as a viable, vibrant and inclusive addition to the local area, as soon as is reasonably practical.

However, regretfully, after considering the balance of merit of the scheme as a whole in the context of all the circumstances, HWWG has come to the conclusion that it cannot support this particular scheme to be granted consent. There are just too many problems with it, some of which are of a fundamental nature that cannot be remedied by minor tinkering, and it urges Camden to reject the application for the scheme as it stands.

SITE A

BUILDINGS BETWEEN THE SOUTH VIADUCT AND THE CANAL TO WEST OF THE SITE.

Character Arising from the Use of the Buildings

1. This part of the site lies within the LDF defined Camden Town Centre, and also within the Regent's Canal Conservation Area. The LDF policies relevant to each of these 2 designations contain inherent tensions with each other: those that seek to promote growth by making maximum use of land and of the vitality and commercial viability (such as retail and restaurant uses) within Camden Town Centre are restricted by the policies to preserve or enhance the character and appearance of this conservation area.
2. This character of the conservation area is defined not only by the appearance of the buildings within it, but also by the uses of the buildings and of the open spaces between them. In respect of "appearance", of particular relevance is the 19th Century industrial heritage both in the immediate vicinity and framing the vistas along the Canal. In respect of "use", of particular relevance is the use made of the towpath that serves as a tranquil haven for local residents using it as an amenity and for pedestrians passing through.
3. The nearby market development to the west of Hampstead Road bridge (i.e. Camden Lock market) generally preserves this tranquillity by being separated from the towpath, so those tourists that do find their way on to the towpath do so by passing through an opening in a wall. The RCCA character appraisal notes such a passing through a sequence of separate spaces as being typical of the character of the area.
4. The proposed development maximises the commercial and vitality potential of site A by using it exclusively for market retail, restaurant and hot food take away uses on each of 4 floors occupying a footprint of about 85% of the site. The existing use of the site, for such uses at ground floor level only, already creates an unacceptable impact upon the character of the canalside. On weekends particularly in summer, transient tourists fill every inch of open space including the towpath, leaving their litter and making the areas unpleasant for the non-tourist population to use. A single use on the whole of the site that serves only the needs of the transient tourist population makes it into a "no-go" area for any local residents. This is already the case for the other market developments nearby.
5. The development of site A for 4 stories of the same mixture of uses will quadruple the existing commercial floorspace, greatly increasing the influx of tourists and intensifying the unpleasant impact on this section of the RCCA. In this development, the placing of public paths giving access to those uses adjacent to the canal towpath will further exacerbate the problem. One could either deal with the necessity to separate tourist pathways from the towpath by having a wall between or else simply by bringing the front wall of the market building right to the back of the towpath (as is the norm for the other industrial heritage buildings nearby) so that access into the market buildings is only from the sides and rear. Internalising the market buildings in this way would follow a long tradition of markets in this country and in mainland Europe of internal market halls.

6. HWWG is further dismayed by the significant quantity of hot food take away establishments occupying this market space in this application. The presence of such establishments is central to the litter and hygiene problems that plague the towpath and canal. We want to see this number radically reduced.
7. HWWG is concerned by the glass enclosed restaurants surrounded by public open space and open at all times at high level on top of the market space. There are already significant problems experienced nightly, particularly in the summer, by noise from the existing leisure facilities set within the current market led developments that prevent residents up to half a mile away from sleeping. Camden Environmental Health statistics of the number of such complaints do not reflect the reality as residents are worn out by the process of complaining when no material difference results. Noise travels far at night particularly when emitted from on high as would be the case here, and a glass enclosure is the least sound insulating material possible.
8. The HWWG considers that there should be a maximum of two floors of market development with two floors of residential or workshop use for the upper parts. This would strike a balance between the promotion of growth and commercial vitality as encouraged by policy within Camden Town Centre and other policies that would tend to restrict such growth (e.g. the protection of the character of the area, primary LDF land use need housing, impact on the over-stretched local transport infrastructure, promotion of quality of place, 24 hour self-policing impact on anti-social behaviour, etc).
9. If the footprint of the market building were increased towards the towpath, there would be a relatively small reduction in market net sellable floorspace, a reduction that would be more than counterbalanced by the increased amount of residential or workshop use for the upper parts.
10. Such a plurality of use would also promote a more benign and safer atmosphere in the public open areas which could become part of the life of local residents and workers, rather than simply being a segregated part of the town serving only outsiders estranged from that local life who have little personal stake in its "ownership".

Impact of Uses on Local Transport Infrastructure

11. The current overburdened state of the public transport system at the weekend is well documented. Camden tube station cannot cope and the streets are jammed with traffic. One cannot walk unimpeded, and the experience of trying to fight ones way through a crowd of outsiders is highly unpleasant and (for the elderly or vulnerable) impossible. The problem is not simply that of numbers, but is in the concentration of those numbers at weekends.
12. HWWG believes that the impact studies carried out by the applicant greatly underplay the increase in number of visitors from this development, and that it should be required to contribute far more to sustainable green transport. Further consideration ought to be given, for instance, to providing free shuttle buses and promoting taxi sharing schemes from Chalk Farm tube, Camden Overground, Mornington Crescent tube, Swiss Cottage tube and other key parts of central London. It should be required to make a contribution to London Transport to assist in the re-opening of Kentish Town West Overground. The scheme should provide taxi and shuttle

bus drop off lay-bys (there is nowhere to do this) and also it should provide many more secure bicycle & motor-cycle bays.

Character of Appearance of the Buildings

13. HWWG considers the design character of the buildings facing the canal not to be fitting for this very important and prominent façade. Although any perception of the appropriateness of a design character has a subjective element to it, nonetheless it was universally felt by HWWG members that the proposed design solution of giant arches wrapping like wallpaper around the market hall buildings was most inappropriate.
14. The scheme architect stated that this design motif was inspired by the 19th century industrial heritage in general and the arched railway viaducts in particular. HWWG welcomes the attempt by the architect to make a bold visual statement, and agrees that a strong architectural statement is merited in this context. HWWG also welcomes the use of brick and agrees that the proposed design concept should complement the rich industrial heritage.
15. However, HWWG believes that this worthy motive for the concept has failed to be transformed into an appropriate result. Although it does welcome the recent amendment to the design of the giant arch facades which gave more depth to the crown and thus a solidity of appearance, the concept of using a series of giant round brick arches attached to the face of concrete framed building produces a Disneyland stage-set character that fails to complement its context, and whose scale unhappily dominates the original arched viaduct with which it sought to be in dialogue.
16. HWWG considers that a design inspired by the industrial heritage does not require literal references to selected local precedents. Rather it should have its own visual coherence which is in dialogue with and plays off against that industrial heritage.
17. HWWG further considers that the design of the set-back top floor above the giant arches looks like a weak, superfluous and incongruous appendage, when set on top of the boldness and massiveness of the arch statement beneath. Its existence adds nothing to the identity of the building as a whole.

SITE D

BUILDINGS FACING CANAL

18. HWWG generally welcomes these buildings. It is glad to see residential use in these buildings and considers that the design character has some merit. Although it has no objection to the office use in some of these buildings, it would prefer any workspace to be for B1(c.) light industrial / workshop use.
19. HWWG does have some reservations about the increased height of one floor, given the prevailing height of surrounding buildings and would prefer if that floor were omitted. However, it also recognises that any assessment of appropriate height that is defensible at appeal would

need to bear in mind the lapsed consent granted at appeal for taller buildings on the adjacent Samuel Smith brewery owned site on Kentish Town Road, albeit that renewal of that consent has been refused.

SITE C

BUILDINGS BETWEEN THE 2 RAILWAY VIADUCTS AND FACING CASTLEHAVEN ROAD

Land Uses

Context

20. The whole of this development should be seen in the context of the considerable tension that has arisen in recent years between – on the one hand -the commercial and leisure vibrancy of the market led developments in the vicinity and – on the other – firstly, the protection of amenity for local residents and, secondly, of opportunity for local workers.
21. In respect of the former, the problems that have arisen from that vibrancy have caused widespread concern in respect of the extreme overcrowding of the streets and public transport systems, considerable night time noise disturbance, widespread anti-social behaviour and other similar erosions of the quality of life that local residents should reasonably expect.
22. In respect of the latter, Camden Town has a rich heritage and reputation in the making of art, craft, food and music. These industries have been priced out of the market by the competition from bought goods that are simply retailed to the 16-25 years olds and tourists. Apart from denying the viability of such industry with the loss of jobs that ensues, it also denies the cultural heritage that has given Camden the reputation for creative industry.

Ground Floor Overall Vision

23. HWWG welcomes the principle that this part of the site is being developed as a “buffer” zone between the commercial activity on site A, which is aimed at the 16 – 25 year old and tourist market. However it considers that this development fails to fulfil its potential as each of the constituent parts of its use (local retail, office, light industrial space) has been considered in isolation. Although it has been billed as being the part being developed with the needs of the local living and working population in mind, this development proposal fails to grasp this unique opportunity to display a coherent vision for site B.
24. This buffer zone has the prospect of being a heart for a plural complexity of creative making industries on all the ground and some of the upper levels. There is here the potential for a centre of making, storing, wholesaling, retailing and exhibiting of art, craft, music and food. The viability for such a venture would be enhanced by creating this linkage of synergies between warehousing, light industry manufacture, workshops, galleries, sound recording studios, live music performance, craft and locally produced food market. Of importance would be degree that each of the premises were of sufficiently small scale with a diversity of individual ownership. Such a centre would attract a much more diverse culture and age of visitor to the area than is provided by the current narrow offer in the current market led developments with a welcome development in the plurality of types of visitor.
25. It is important that in this vision, the number of outside visitors that are drawn by it do not to make any significant contribution to the problem of the over-crowded streets and public transport infrastructure. A large proportion of the accommodation should be that in which

goods are made, stored, sold on a wholesale basis; creative events (street theatre / performance art / buskers) should be of a relatively low key nature; and opening times are spread throughout the week.

Local Retail Use

26. HWWG welcomes the inclusion of retail space designated to serve the basic needs of the local population (butcher, baker, flower shop, shoe repairer, hardware, etc) at the ground floor of Building C1 (facing Castlehaven Road). Although these, in the main would be run by individual shop owners, it does not just want to see up-market food offers and considers that there should also be a very small food supermarket which might be run by a chain. It considers that the difficulties of definition of what type of shops would fall within such a category can be overcome.
27. However HWWG is not yet satisfied that the provision of a 60 foot deep and space "local retail" space in this current development does meet such needs. For such retail space to be viable, in addition to the rent levels being affordable, there needs to be a parade of small shops, each small enough to be affordable and with a sufficient number in a visible parade to create the diversity and visible critical mass necessary to draw customers.

Upper Levels

28. HWWG welcomes the use of the upper levels for residential (on building C1) and workshop and residential (on Building C2).

Open Spaces

29. The large size of footprint of building C2, at about 50% of the footprint of site C squeezes the sizes of the open space public domain surrounding it, which become left over purposeless space with no quality of sense of place.
30. The vaguely described "community space" to the west of building C2 has no purpose and its small size (approx 21 x 26m) is problematic for much of the kinds of uses that it could otherwise be put to. It cannot effectively be used for any such creative industry activities, e.g. live art performance, theatre, art / craft / food market, bandstands for ad-hoc entertainment on other days, together with seating, etc.
31. Similarly, what was originally billed as a 2nd public open space to the east of building C2 has shrunk to become a simple confluence of routes. The route to the south of C2 has a blank wall on one side and offices (an internal activity) on the other. The route to the north west has light industrial to one side and predominantly a vehicular service bay to the other. The opportunity to create public open and covered areas that lead from one meaningfully used place to another has been lost, leaving blank walls and meaningless alleys leading to spaces (rather than places) that no-one would be attracted to go to.
32. HWWG is not prescribing one solution to this problem but offers two suggestions that would deal with it. The first suggestion is to make the majority of the ground floor of Building C2 (Central Triangular Building) open at its edges, increase its height to say 6m, and occupy that space with retail outlets and/or public exhibition or performance areas so that the whole of the ground floor of site Cs up to the viaducts and Building C1 (Castlehaven Road frontage building) on its periphery could be seen and used as a single public space, part under cover and part not.

33. The second suggestion is to reduce the size of Building C2 by squaring up its façade to Building C1, which would change its shape to a 18m depth rectangular shape (18m is an efficient depth for a residential building and is the depth of Building C1) and thereby increasing the size of the designated “community space” and providing it with a much more usable squareish shape.

Height, Bulk and Design of Building C2 (Central Triangular Building)

Height and Bulk

34. In HWWG’s view, the biggest single problem in the development is the height and bulk of building C2, a 30m high building occupying half the footprint of the whole of site C. HWWG considers that it would dominate the skyline from afar, from its immediate residential context to the north and from the so-called “community space” within the development. As can be seen from the elevations P2100 & P2101, this building C2 is over double the height of any other building in the area, save for the Torbay Court housing complex. Although the developer has sought to argue the precedence of the height of Torbay Court, the existence of the latter is an exception to the general context of 2,3 + 4 storey buildings that surround this development, and the impact of its height is mitigated by having large open green space surrounding it.
35. From the south the bulk of this building C2 would be prominently visible over the viaduct and other buildings fronting the canal despite the applicant’s attempt to represent otherwise by carefully selected views, being double the height of anything else in view. Its height would dominate the landscaped square to the north and its surrounding dwellings on Leybourne and Hawley Streets, being 3 times as high as those terraced dwellings it faces. From the interior, it would loom over the “community space” adjacent, being considerably taller than the length or width of this space.
36. It is very relevant to note that sites B + C are outside the LDF designated Camden Town Centre area, within which it is Camden’s policy to focus development in order to make the best use of limited land to promote growth. As such, there is not the same need to promote growth on sites B + C at the expense of the protection of design quality, of cultural heritage, of quality of streetscape, and of residential amenity on the other, as there is in relation to buildings on sites A + D, adjacent to the canal.
37. HWWG considers that the most height that could be justifiable in the built context that is predominantly around 10m high, is a building which could accommodate 3 stories of workshop type height space and 4 of residential height space, which height included any plant space.

Design Character

38. HWWG believes that the final development of the design character in the application of building C2, does not fulfil the richer potential that was expressed in some of the architect’s sketch visualisations immediately prior to the submission. The application design is of a regularly ordered giant framed structure containing a regularly repeated bay treatment design. As this building is so huge, this repetition of a limited palette of design motifs in a highly regular way produces a monolithic gargantuan order that belies its residential use and ignores the domestic scale and grain of its residential context. Although it recognises the architect’s attempts to break up the elevation by slightly recessed balconies, HWWG considers that the architect has not sufficiently developed the design to reflect a domestic grain and richness of articulation to soften the impact of this giant monolithic order. It is to be noted that the Hawley

Wharf Planning Framework expressly warned against the appropriateness of such a design approach being adopted in reference to the poor standard of design set by Gilgamesh just to the west of this development.

Height, Bulk and Design of Building C1 (Buildings facing Castlehaven Road)

Context

39. HWWG considers that any building that fronts Castlehaven Road should, firstly, be in dialogue with the other residential buildings surrounding the landscaped square it faces, and secondly, to seek to relate to the other buildings and structures existing on each side so as to reinforce the unity of the sense of the street. HWWG considers that this Building C1 fails on both counts.

Building Height

40. This Building C1 is 5 stories + set back 6th floor of a total of approx 19m high and is therefore almost twice the height of the approx 10-11 m high buildings on Leybourne and Hawley Streets, and 50% higher than the Hawley Arms adjacent. Bearing in mind that this site C is not within the Camden Town Centre, (where a maximumisation of the use of the land is encouraged) HWWG considers that it should be no more than 4 stories high.

Building Footprint

41. HWWG considers that this building should extend the full length of this elevation, and not just for $\frac{3}{4}$ of it: by keeping the bulk of Building C1 back behind it, an identifiable coherent identity of streetscape is reinforced, the visible local retail parade is extended (and thus made more viable) and a sense of place on the pavement promoted. This approach would also assist to complete the fourth side of the landscaped square that are otherwise bordered by homogenous brick structures (terraces and the viaduct).
42. HWWG recognises that the current approach to the footprint of the buildings is in response to a desire by Camden planning department to promote “permeability” between the site C interior and the residential context to the north by the creation of a route between Buildings C1 + C2. However, HWWG considers this approach to misunderstand the differing degrees of permeability that is appropriate between the site interior and its context.
43. It considers that a combination of the other two proposed routes (adjacent to the west side of the north viaduct and the covered route through the middle of Building C1) would be sufficient for local residents and workers to find their way to the interior of the development sand from there to the canalside from the north. This is not the place to be creating a network of wide open routes that would promote an influx of outsiders beyond the interior of the development into the residential surrounding areas, which has been the cause of so much of the problems for residential amenity catalogued elsewhere. The elimination of this route would also benefit the usefulness of the “Community Space”, as a place to stop and use, rather than just being a junction of routes to be passed through.

Covered Passage

44. HWWG has reservations that the use of the part single and part double storey covered passage through the block would feel pleasant and safe and feels that its height insufficiently reflects its public function. It would prefer if it were three stories high, and ideally open to the sky. It further considers that there is insufficient activity down its sides throughout the day and evening in order give it vitality and make it feel safe.
45. Instead of there being the cinema entrance on one side (busy only in the evening at the times of start & end of films) and a residential entry on the other, the local retail space should address it on both sides. This would then produce the further advantage of promoting the visual continuity of the “local” shopfronts leading from the street to the interior, and thus enhancing their viability.

Design Approach

46. HWWG further considers that the design approach adopted in Building C1 is not appropriate, for similar reasons as that for the design of Building C2: it was felt that the use of the giant double storey frame device is inappropriate to reflect the domestic nature of the accommodation and to relate to the domestic grain and scale of the context. There is a much stronger case to be made for a design approach of brick walls, broken up to reflect the smaller grain in a manner which also creates a coherent ordered streetscape façade and which contain a variety of types of openings and depths of opening including inset balconies in order to enliven the overall order.

Basement Cinema Use

47. HWWG welcomes the inclusion of an “Everyman” type “art house” cinema at basement level, though is concerned that any consent should be restricted by S106 so that the creative cultural nature of the offering occupying the space was promoted. A consent for D2 use on this part should allow other creative industries, e.g comedy performance or theatre, but not gaming machine establishments or a cinema only offering Hollywood mass blockbusters.

SITE B

BUILDINGS TO THE EAST OF THE NORTHERN VIADUCT AND FACING HAWLEY ROAD

Inclusion of a School, rather than Affordable Housing

48. Although HWWG welcomes that a decision has been made to only submit one option, rather than two (with and without a school), it would have preferred a scheme on this site B of purely residential development, rather than half of it being used for a school. It deeply regrets that – apparently as a result of the inclusion of this school –only 5% of the residential is for affordable housing use.
49. HWWG is strongly in favour of the development meeting the 50% affordable housing target which – on the face of the information available to it – it considers would be financially viable to do.

Bulk and Scale

50. HWWG considers that the scale and bulk of the buildings fronting the main Hawley Road, at about 4 domestic stories of height to be welcome, and considers that this scale would satisfactorily relate to the retained listed building at 1 Hawley Road and other existing adjacent buildings.
51. HWWG is however concerned at the height of the residential block on the interior at 8 stories, which it considers would unhappily dominate its context and not to be justifiable on policy grounds as this site is not within the LDF designated Camden Town Centre. This building is 3 times the height of the existing buildings on Hawley Road and Kentish Town Road and would be clearly visible from each. It considers that its height should be restricted in height to a maximum of six floors.

Interior Residential Building

Footprint & Relationship with Surrounding Open Space

52. HWWG would prefer to see the footprint of the interior block to be reduced in size to mitigate two problems with the surrounding open space. Firstly, the amount of useable open amenity space surrounding it has been squeezed to a point that it is just the left over space between the building and site boundary. Secondly, the interior block is adjacent to a long wall separating the residential part of the site from the school, and the combination of the two produces a pedestrian "tunnel-like" path linking Hawley Road with the canal, overshadowed and dominated by the mass of this interior building, making it feel unsafe and unpleasant.

Design Character

53. In the context of the residential use these buildings and that of the surrounding context, HWWG welcomes the design approach of a layering of brick facades with openings punched within. It also considers that the design solution on the buildings facing Hawley road have some merit. However it is concerned with the particular development of this design approach for the interior building, particularly on the east, west and south facades, which it finds as uninspired. Any building that is allowed to rise above those surrounding, should be required to reach a higher quality of detailed design in order to merit its greater prominence.

Residential Daylight ./ Sunlight

54. HWWG is concerned that much of the residential units at lower levels will have insufficient daylight and sunlight, being blocked by the viaducts and by Building C2 on the adjacent site C. Many of these units would clearly fail the BRE tests.

General Industry Use of Arches

55. The continued use of the arches to the south of this section of site, and accessed off Kentish town Road as B2 general industry and other similar type sui generis employment uses was welcomed. Further consideration however needs to be given as to how these will in the future be properly serviced, by large delivery & rubbish vehicles entering and leaving the main road safely in forward gear.

School, including 1 Hawley Road.

56. The application for the school is in outline form only and so little can be said save to comment on the overall suitability of the site for the purpose. HWWG has some reservations that it is being shoe-horned into the space available and considers that – if one were to have a school – then it would prefer for the whole of site B be used for the purpose. In order to finally come to a definitive position on whether the school can satisfactorily work on the site it is being given, HWWG needs to understand how the school governors assess the position.
57. HWWG however is specifically concerned by the health and safety implications of the entrance to the school being on Hawley Road and would require to see a detailed design development of the entrance area, and how it is proposed that people would get on / off buses and cross the road to it, before being satisfied that it could work even in principle, as that is all that is being considered for an outline application.
58. HWWG welcomes the refurbishment and use of 1 Hawley Road, as part of the school.