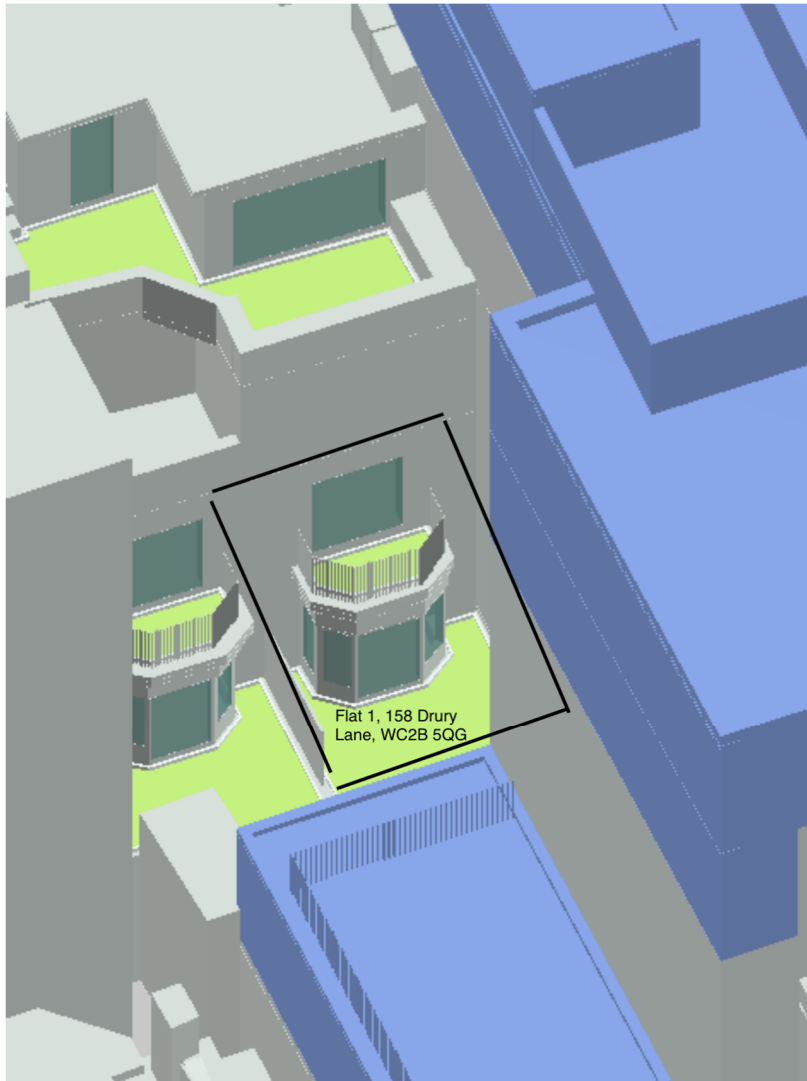


From: Vera Graziadei
Sent: 21 July 2023 04:26
To: Planning Planning
Cc: Enya Fogarty; Erwan Toulemonde
Subject: STRONG OBJECTIONS TO 2023/2245/P
Attachments: Window Key - Right of Light Consulting.pdf; Updated Core Objections to Drury Works- Monday.pdf; Updated Daylight Sunlight Overshadowing Report - Grounds for Objection - Monday.pdf

[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.

Vera Monotti Graziadei



Dear Council Representative,

I am writing to express my deep concern and strong objections to the proposed planning application 2023/2245/P for the development at 160-161 Drury Lane. The current proposal raises several critical issues that significantly impact the well-being and quality of life of the surrounding community and the tenants of my flat.

Main Objection 1: Loss of Daylight and Its Impact on Mental Health

Based on the comprehensive report by Charles F. McMahon LLB (Hons) MSc Psy, Right of Light & Party Wall Surveyor (see attached), I wish to highlight the critical issue of daylight distribution. The existing daylight distribution to my living room (windows 23-27 in attachment Window Key) currently stands at 80.15%, providing a well-lit and comfortable living space. However, the proposed development will cause a significant

reduction to 63.38%, resulting in a substantial 20.8% decrease in the formerly enjoyed light levels.

The distribution of natural light within living spaces is essential for promoting a sense of openness, tranquility, and well-being for residents. Adequate daylight contributes to a healthier living environment, positively affecting physical and mental health. It has been scientifically proven that access to natural light improves mood, reduces stress, and enhances cognitive function.

My tenants often work from home and rely heavily on a well-lit environment to maintain productivity and concentration. The reduction in daylight distribution may lead to decreased motivation and focus, ultimately affecting the quality of work and overall job satisfaction.

Additionally, preserving sufficient natural light is crucial for residents of my flat seeking a peaceful resting environment. A well-lit living space contributes to a sense of relaxation, better sleep quality, and a restorative rest experience.

I sincerely hope the Council will seriously evaluate the proposed development's impact on daylight distribution and thereby demonstrate its commitment to the well-being and comfort of the community.

Main Objection 2: Overlooking and Privacy Concerns for My Living Room, Bedroom, and Patio

The proposed development will significantly impact my living room, bedroom, and patio. The adverse overbearing effect will create an oppressive living environment, directly affecting the sense of privacy and well-being of my tenants within their own home. The proposed development will directly overlook and encroach upon my flat's living room, which is a space where tenants seek relaxation and tranquility. The increased wall along the full length of my flat's rear boundary will result in a loss of outlook, making it difficult for tenants to enjoy the natural light and view that they currently have. This intrusion on their living space will lead to feelings of exposure and discomfort, significantly affecting their daily life. Moreover, the impact of the development extends to the master bedroom, which is supposed to be a sanctuary for rest and rejuvenation. The increased wall and potential overlooking will disrupt the peacefulness of this bedroom, making it challenging to find a restful sleep environment. Furthermore, my flat's patio, which my tenants cherish as an outdoor retreat, will also be impacted by the proposed development. The loss of privacy due to overlooking will compromise the sense of serenity that they currently experience in this patio space.

Preserving the privacy and peacefulness of my flat's living room, bedroom, and patio are crucial for maintaining a high quality of life within this home. I urge the Council to consider the adverse effects of the development on my flat's private living spaces and the impact it will have on the mental well-being and overall enjoyment of this home.

Objection 3: Misleading References to Previous Planning Application (2019/2095/P)

In 2019, the site's previous owner obtained planning permission for a substantial enlargement of the building (Application 2019/2095/P). Local residents firmly believe that the approval granted in 2019 was flawed due to the presence of erroneous information within the application and the absence of crucial data on overshadowing. Moreover, the lack of effective public consultation during the 2019 application process hindered any meaningful challenge to its content.

However, it is crucial to note that the 2019 application expired in late 2022, rendering it an irrelevant benchmark for assessing the potential impacts of the current 2023 application on nearby premises and the overall streetscape. The 2023 developer's proposal, while referencing and comparing itself to the 2019 approval repeatedly, cannot rely on an expired, flawed, and outdated application as a basis for approval.

Local sensitivities surrounding the current planning application are primarily driven by its impacts on the existing status quo, not a hypothetical scheme that never materialized beyond the drawing board. Therefore, we urge Camden Planning to evaluate the 2023 Application in light of the present conditions and not to be influenced by a time-barred, flawed earlier application.

I believe it is essential to base the decision on the merits of the 2023 Application and its potential effects on the current local environment and community, rather than relying on a previous, problematic application that is no longer applicable. I hope that Camden Planning will consider this objection seriously and ensure a transparent and fair assessment process for the betterment of our community.

Objection 4: Lack of Consideration for Public Consultation on the 2023 Application

The applicant initiated a phase of 'public consultation' after engaging in pre-application discussions with The Council. During this 'consultation', local residents voiced deep concerns about several critical issues related to the

proposed scheme, including the bulk/height of the building, potential loss of natural light, anticipated noise levels, and privacy concerns. The consultation process elicited a significant response from the community, reflecting the genuine and heartfelt apprehensions of those who would be directly impacted by the development.

However, it is disheartening to observe that the applicant's final submission does not appear to reflect any meaningful consideration or integration of the public's feedback. It seems as though the public consultation was merely conducted for appearance's sake, without any genuine willingness to adapt the plan in response to the expressed concerns of the community.

The failure to address the legitimate worries of local residents demonstrates a lack of respect for the community's interests and aspirations. Moreover, it raises questions about the transparency and integrity of the planning process, which should ideally incorporate and balance the views of both the applicant and the affected public.

As a stakeholder in the future of our neighborhood, I firmly believe that any development project should be the result of a collaborative process, incorporating the feedback and aspirations of the community it seeks to serve. Ignoring the concerns raised during public consultation undermines the principles of responsible urban planning and community engagement.

In light of the above, I strongly urge Camden Planning to reevaluate the 2023 Application in light of the public consultation feedback and to ensure that any approval granted reflects the genuine interests and well-being of the local residents. We seek a development that harmoniously blends with the existing community, respects the character of the neighborhood, and takes into account the legitimate concerns of those who call this area home. I sincerely hope that Camden Planning will conduct a thorough and unbiased review of this particular objection.

Objection 5: Impact on the Local Environment

The proposed development on Parker Street has significant implications for the local environment, particularly for the residents of Parker Street, Drury Lane, and Great Queen Street above ground floor level. These streets predominantly serve as residential areas, and the adjoining buildings to 160-161 Drury Lane are all occupied by individuals who highly value aspects such as studying, working from home, quiet enjoyment of private spaces, and quality sleep. It is crucial for the Council to consider the needs of these residents, as they will receive no tangible benefits from the proposed scheme.

One of the purported community benefits highlighted by the applicant is the elimination of antisocial behavior along the Parker Street frontage. However, it is essential to recognize that this antisocial behavior is a direct consequence of the owner's mismanagement of the premises. The poor condition and apparent abandonment of the site act as a magnet for antisocial activities. A more practical solution would be for the owner to take responsibility for managing the premises better, which could effectively address the issue without the need for the proposed development.

By proceeding with the proposed scheme, the Council risks undermining the residential character and tranquility of the neighborhood. The wellbeing and peaceful existence of the current residents should be prioritized, and any development should be mindful of its potential negative impact on the existing community.

In light of the above, I strongly urge the Council to take into careful consideration the interests and needs of the residents living in the vicinity of the proposed development first and foremost. It is imperative that the Council makes decisions that foster the well-being and harmony of the community, rather than introducing changes that could disrupt the lives of those who currently call this area their home.

Objection 6: Proposed Design and Build Form

- I. **Fifth Floor Design.** The proposed vertical extension for the fifth floor is significantly more dominant than a mansard roof, which is commonly seen on nearby buildings. A mansard roof, set back from the parapet, would be a more fitting design that harmonizes with the character and appearance of the conservation area. The fifth floor, as currently designed, presents a hard-edged block that does not blend well with the overall character and streetscape. Its abrupt termination of the roofline creates an awkward and intrusive profile.
- II. **Impact on Adjoining Residences.** The Council's pre-application response acknowledges the potential for overbulking, yet it appears to undervalue its impact. The applicant scaled back the second and third floor extension, but the significant bulking of the rear of the fourth and fifth floors remains, to the detriment of adjoining residences. This overbulking has a direct and adverse effect on residents' amenity and quality of life.
- III. **Overshadowing and Daylight/Sunlight Impact.** The 2019 application failed to assess the overshadowing of terraces, balconies, and gardens, despite the Council's request to do so. The proposed fourth-floor extension leads to a reduction in daylight and sunlight for residents, with some properties, like my own (Flat 1, 158 Drury Lane) severely affected. (see objection 1)

- IV. **Loss of Outlook and Enclosure.** The fourth-floor extension contributes to an overbearing and enclosed environment for neighbours, resulting in a loss of outlook and an increased sense of enclosure. Specifically, two flats at the fourth-floor level, including my own (Flat 1, 158 Drury lane and one at Market House, 12 Parker Street) are significantly impacted by this extension.
- V. **Fifth Floor Extension.** The proposed 1.5m deep extension to the fifth floor remains despite the Council's previous concerns about overbearing and over-enclosing effects on adjoining properties. This additional bulk and mass would create an unduly oppressive living environment for residents of Flat 6, 12 Parker Street, and other residential properties in Drury Lane. The extension adversely affects the outlook from habitable room windows and introduces a sense of enclosure.

In light of the above, I firmly believe that any heightening of the building should follow a stepped-back upper storey design with a mansard roof, similar to other buildings in the neighbourhood. The current proposed design, with its vertical face and lack of consideration for the conservation area's character, is not suitable and should be revised.

I request that the fourth floor footprint remains unchanged, and the fifth-floor back extension is omitted from the application entirely. By doing so, we can preserve the integrity of the local environment, respect the needs of existing residents, and maintain the aesthetic appeal of the conservation area.

Objection 7: To the proposed 1st floor rear extension and 2nd floor terrace.

- i. **1st Floor Rear Extension:** The proposed 1st floor extension at the rear of the building would create a massive vertical cliff-face that will overpower the courtyard behind 8-18 Parker Street, resulting in a significant reduction of natural light for the area. Furthermore, residents in 158 and 159 Drury Lane, whose windows currently overlook an open quadrangle, will instead face a vertical wall. This drastic change would greatly diminish the visual appeal of the courtyard and is not acceptable.
- ii. **Status of Steel Stairway:** The plans do not clearly indicate the future status of the short steel stairway from the existing 1st floor to the Parker Street back yard. The uncertainty surrounding this structure adds to the lack of clarity and raises concerns about its potential impact on the neighboring properties.
- iii. **2nd Floor Terrace:** The applicant's claim that the existing flat roof at 1st floor level has been historically used as a terrace is misleading and not accurate. The roof is not an amenity area and is solely utilized for fire evacuation routes and maintenance of air conditioning plant, as stated in the planning officer's report on the 2019 application

and the sales prospectus for the building at the time of the applicant's acquisition.

- iv. Privacy and Noise Concerns: The proposed terrace at 2nd floor level would be one storey higher than depicted in the provided photograph, resulting in direct views into habitable windows in Parker Street, Drury Lane, and Great Queen Street. This intrusion significantly compromises the privacy of residents in these properties. Additionally, the terrace's proximity to habitable windows in residential properties raises concerns about potential noise and disturbance from conversations and music, particularly given the office usage of the building.
- v. Council's 2019 Stance: In the 2019 decision notice, the Council made it clear that the areas to the rear, including any potential terrace, should be restricted for emergency use only, not for amenity purposes. I strongly advocate for the Council to maintain this stance, considering the detrimental impact on neighboring residents' amenities and well-being if the terrace is allowed for general use.

In light of the above, I vehemently object to the proposed 1st floor rear extension and 2nd floor terrace. These developments pose a severe threat to the privacy, natural light, and overall amenity of the surrounding properties. The Council should adhere to its previous position and ensure that any rear terrace usage is restricted solely to emergency purposes.

Objection 8: Daylight and Sunlight Impact

The quadrangle of buildings along Great Queen Street, Parker Street, and the connecting part of Drury Lane plays a vital role as a 'light well' for numerous residences, including my own. (Flat 1, 158 Drury Lane) The rear yard of Market House, Parker Street, serves as a year-round amenity for residents, and any changes to the bulking of the upper storeys and the proposed extra floor on the rear of 161 Drury Lane will have a detrimental impact on the daylight and sunlight received by several residences, as well as their terraces, balconies, and the yard. (see objection 1)

One of the significant deficiencies in the 2019 permission was the failure to account for the overshadowing of terraces and balconies of residences. This oversight is of great concern to the amenity value of residents' limited outdoor spaces and is an essential aspect that the Council must take into serious consideration.

In the current 2023 application, the applicant attempts to downplay the year-round impact by claiming that the "summertime results are fully compliant with the BRE guide...". However, it is crucial to note that the BRE Guide does not set specific targets for summertime results, and describing compliance based on this metric is deliberately misleading.

(My property is one of the residences facing the greatest loss of light, as per the first two objections.)

The applicant's reliance on the removal of the hexagonal fire escape as a significant improvement to light reaching some parts of adjoining premises is flawed. The staircase's open lattice construction means that the actual benefit of its removal is exaggerated, and the impact on daylight and sunlight is not adequately addressed.

Given the importance of daylight and sunlight to the well-being and amenity of residents, I strongly urge the Council to conduct a thorough and unbiased assessment of the proposed development's impact on these crucial aspects. It is essential that the Council prioritizes the preservation of natural light for existing residents and their outdoor spaces to maintain the high quality of life in the area.

Objection 9: Ground Floor Retail Usage

I would also like to express my concern regarding the ground floor retail unit proposed in the development. There is a potential risk that the designated retail space could be converted into a restaurant (previously categorized as A3) without requiring explicit planning permission, as the development falls under class E.

In the 2019 application, the Council acknowledged that this area is susceptible to issues of noise and disturbance from existing licensed premises. To address these concerns, the Council recommended attaching a condition to prohibit primary cooking on-site. This condition aimed to prevent the installation of kitchen extract equipment, thereby avoiding associated issues of noise and odours. Additionally, the restriction would ensure that the unit does not operate as a traditional restaurant with late-night opening and licensed premises. Instead, it would cater to daytime-focused businesses like cafes or food stores under class A3.

To make the development acceptable, it was considered necessary to limit the hours of operation for the ground floor commercial unit and prevent amplified music from being audible from the highway. This limitation aimed to prevent unsociable hours of operation and minimize disturbances for nearby residents.

I respectfully request the Council to apply similar conditions to any approval granted for the current development:

1. No primary cooking shall take place within any part of the approved development. This condition would help preserve the tranquility of the

area, preventing issues with kitchen extract equipment and associated noise and smells.

2. The ground floor commercial unit fronting Drury Lane, if approved, shall only be operated within the following hours:
 - Mondays to Saturdays: 08:00 to 20:00 hrs
 - Sundays and Bank Holidays: 09:00 to 20:00 hrs

These revised operating hours are more conducive to the well-being of local residents and align with the area's character. The neighborhood already has a plethora of catering establishments, and a more conservative closing time would reduce the potential for disturbances during the late evening and nighttime hours.

Moreover, I request that the Council ensures no music is played on the premises in a manner that is audible within any adjoining premises or on the adjoining highway. This measure will further safeguard the peacefulness of the area and protect residents from unnecessary noise pollution.

Objection 10: Bike and Bin Store Location and Noise Concerns

I raise concerns regarding the proposed location of the bike and bin store, particularly in relation to noise and disturbance issues, which were already raised during the 2019 application process and continue to be valid concerns. I strongly advocate for a more suitable location for the bin store, specifically in the slot currently occupied by the existing bike store. This alternative location would significantly mitigate the potential for nuisance issues and disturbances for residents.

If the Council does not require this reasonable adjustment to the plan, I urge the application of a condition similar to condition 6 of 2019/2095/P. This condition requires noise insulation to be installed to address noise concerns effectively. Implementing noise insulation is crucial to ensuring that residents are not unduly affected by any potential noise generated by the bin store.

Additionally, we request that any ventilation provided for the bin area should be 100% passive, such as through air bricks, to eliminate the possibility of noise nuisance from an electric fan. Passive ventilation methods are less likely to cause disturbances, and the use of electric fans should be avoided to uphold the peacefulness and quality of life for residents in the vicinity.

Objection 11. Impact of Construction on Residents

The proposed construction will have a significant impact on nearby residents, particularly concerning noise and dust. To ensure the well-being and quality of life of residents are adequately protected, I strongly urge the Council to apply appropriate hours restrictions during the construction period.

I propose the following measures to mitigate the impact of construction:

- **Hours Restrictions:** The Council should impose construction work hours restrictions, limiting activities to between 09:00 and 17:00. To further protect residents from excessive noise, the noisiest construction activities should be confined to core hours between 10:00 and 14:00. This will help safeguard the tranquility of the neighborhood during early mornings, evenings, and weekends when residents are more likely to be at home.
- **Delivery Hours:** Deliveries associated with the construction should also be restricted to the hours between 09:00 and 17:00. Ensuring that deliveries do not occur outside of these hours will minimize disturbances to residents, allowing them to enjoy peace and quiet during the early mornings and evenings.
- **Proper Management of Vehicles:** Vehicles associated with the construction should be appropriately managed, with engines turned off when not in use, and the flow of traffic must be maintained. Additionally, efforts should be made to keep pavements clear to ensure safe pedestrian access.
- **Dust Management:** Dust generated during construction is a genuine concern. We strongly urge the Council to require a comprehensive construction management plan that includes measures to control and mitigate dust. This should include additional cleaning for adjoining residents, including windows, to alleviate the impact of construction dust on their living spaces.

I implore the Council to thoroughly assess each of these objections and consider the impacts on my own property and the local community. The proposed development should prioritize the needs and well-being of existing residents, fostering harmony with the surrounding environment. Your careful consideration and transparent evaluation of these objections are crucial to ensuring the preservation of our community's unique character and quality of life.

Thank you for your attention to these matters, and I look forward to hearing from you soon.

Sincerely, Vera Monotti Graziadei

