
From: Erwan Toulemonde [REDACTED]
Sent: 23 July 2023 14:46
To: Planning Planning
Cc: Enya Fogarty; Erwan Toulemonde
Subject: Objection to 2023/2245/P
Attachments: Updated 23-Jul-23 Core Objections to Drury Works 2023 2245 P.pdf; Updated Daylight Sunlight Overshadowing Report - Grounds for Objection.pdf; REVISED PROPOSED NORTH EAST ELEVATION.PDF; 230723 Erwan Toulemonde Objection to 2023 2245 P.pdf

[REDACTED]

Dear Ms Fogarty,

Thank you again for visiting the site a few weeks ago. This is my personal objection in relation to our 4th floor 3 bedroom flat and our 5th floor self-contained studio (an annexe). They are 2 separate units but fall under the title address of Flat 6, Market House, 12 Parker Street, WC2B 5PH.

On the basis of the amenity impact on myself and all the information reviewed, I strongly object to the development's

- Proposed fifth floor.
- Proposed the 4th floor extension.
- The roof scape proposed.
- The 2nd floor terrace

and I endorse all other points of objection put together in the **8 pages Core Objection by the Friends of Parker Street**. This is a community group which has members in Parker Street, Drury Lane and Great Queen Street. Attached is the latest version, dated 23rd July.

Please note that many details severely impact me as a resident of the 3 bedroom 4th floor flat and owner of the self-contained 5th floor studio, and regular user of the 5th floor terrace, as my daughter lives there.

All my objections are based on strong grounds i.e. facts, data, policy and historical cases reviewed.

I hope the Council will positively intervene when the amenity of so many residents is at stake. The development is only to serve a higher level of return for a developer. This is about 20 workers that will be

working on the top floor, only part of the week, versus impacting the life of dozens of residents 7 days a week, for decades. Even with the Council getting a small one-off levy of £247.5k towards social housing, this is surely the wrong thing to allow.

There are hundreds of empty offices in Greater London and I do not see therefore the merit in Camden Council damaging the amenity of residential occupiers by increasing the height and floor sizes of this building. Furthermore you have reached your target through developments in Kings Cross.

Light/Sunlight/Overshadowing

The attached Daylight/Sunlight/Overshadowing report lists numerous clear breaches and is calling out some false interpretation of data from light surveyors appointed by the developer (Point 2). I am looking for the Council to protect my amenity.

Page 4, 5 and 6 makes numerous references to our properties i.e. the

- W6/254 (Point 2 ref), the Window 11 (ROLC ref) on 4th floor & the impact of the living area
- W1/255 (Point 2 ref) and Window 16 (ROLC ref) on 5th floor & the impact on the kitchen
- terrace of 4th Floor 3-bedroom flat, 12 Parker Street
- terrace of 5th Floor Self-Contained Studio, 12 Parker Street

It is inappropriate for Point 2 to consider the comparison between the previous consent scheme as it has now expired and they also have misrepresented the facts in relation to the BRE Guidelines, both on the consented scheme comparison element, along with their alternative sunlight to garden results. I find Point 2's survey misleading, and they clearly try to brush away key breaches.

Each point needs to be taken into consideration, analysed, and addressed. Please find attached the report which is more than a 1/3 relating to Flat 6 4th floor + 5th Studio and their respective terraces.

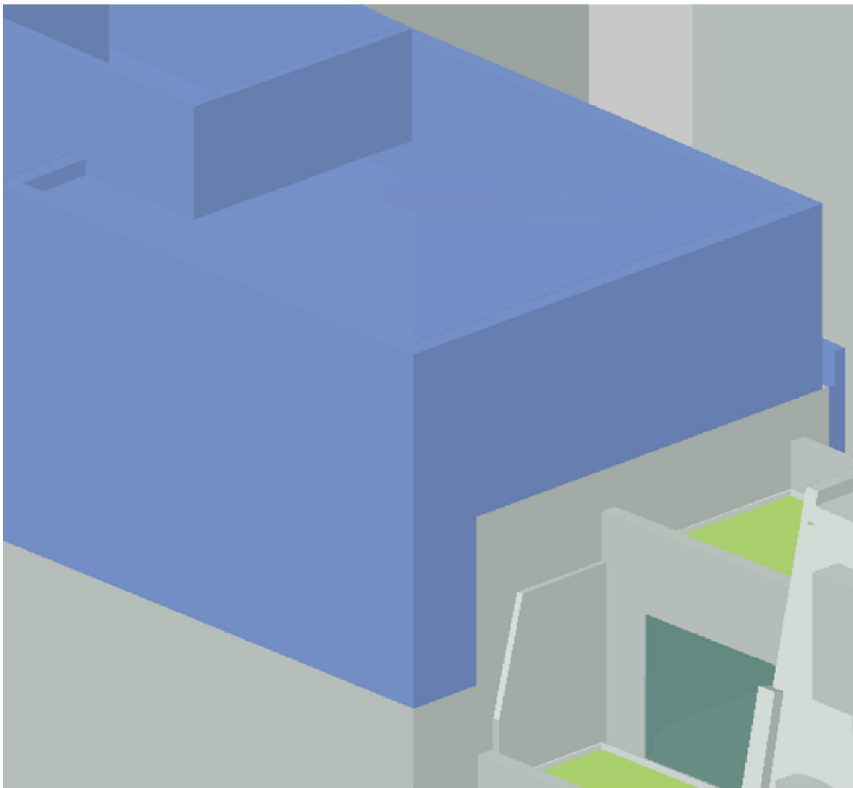
Overshadowing of our terraces: The developer in 2019 did not do an overshadowing survey, even though the council requested it. It is clear why they didn't, once you review the data produced in 2023. Point 2, appointed by the developer, is trying to diminish the problem by wanting to *selectively* compare light impact at 21st June when 21st March is the reference point.

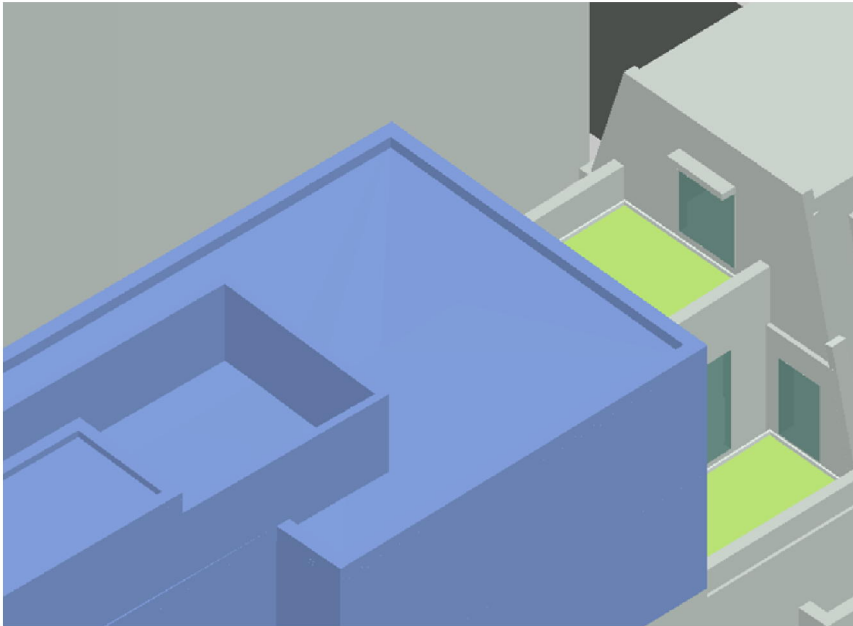
The results show they are in severe breach and the Point2 is misrepresenting the data to diminish its message. The proposed development is massively impacting our terraces, and our terraces are a source of wellbeing for myself and my family all year around. We have planting on them and the sun that reaches there throughout the year plays a large role in our life.

Please refer to all the arguments listed in the Right Of Light Consulting report commissioned by residents. The damage to our winter (and summer) hours is enormous and well beyond guidelines, and cannot be allowed.

Overbearing effect and unduly oppressive living environment

Our 4th floor kitchen, living room and the self-contained studio will all suffer an adverse overbearing effect from the overbulking. Overbulking proposed results in an unduly oppressive living environment for existing and future neighbouring residents due to loss of outlook from those rooms and their adjoining terrace spaces which will be significantly impacted. See below through pictures:





Beyond the impact on our flat, the over-bulking of the development is creating a sense of over-enclosure to all residents at the back with many being impacted beyond acceptable level (especially 40 Great Queen Street and flat 1 and 2, 158 Drury Lane).

Clear loss of outlook is suffered also by flat 4, 158 Drury Lane.

Proposed roof form

The proposed development further jars against the otherwise natural flow of buildings along the south side of Parker Street: whilst the upper floor is slightly recessed; it's still very visible as a hard edge from street side, at odds with the adjoining building of Market House. The vertical hard lines and bulk of the upper floor are out of sync with nearby buildings - front and back.

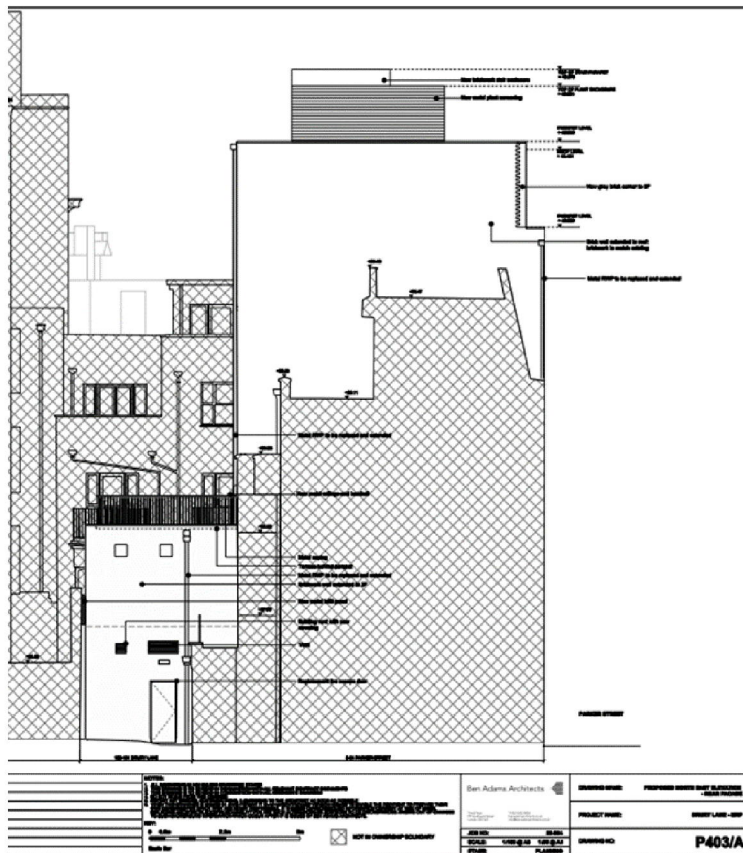
The new roof with scalloped tiles just looks poorly thought out - it looks like a bolt on rather than being an integral part of the design. Surely the softness of a sloping mansard would be far more appealing and in line with the neighbours, but this has not been proposed.

- light/sunlight/"sun over ground", "overshadowing" of resident properties.
- the heritage and streetscape of Parker Street and Drury Lane.

A real recessed mansard (i.e. sloped roof) all around the building would, if done right:

- increase my access to light and sunlight to 4th and 5th floor
- reduce overshadowing breaches to the 4th floor and 5th floor terraces.
- be in keeping with the Seven Dials Conservation Area and the adjoining Covent Garden Conservation Area (which imposed a recessed roof at 30-35 Drury Lane, right in front of Drury Works, just across the road)

The vertical proposed roof created tall flanks that significantly affects residents such as they create massive overbearing flank walls. Please see below **REVISED PROPOSED NORTHEAST ELEVATION** drawing which illustrates both how overbearing this flank wall will be for us, and how the overbulking impacts the flats in 158 Drury Lane.



Parker Street is a beautiful street with recessed mansard roof, much like the vast majority of Covent Garden. I object to the vertical roof shape proposed for the 5th floor which damages the streetscape and conservation area by creating an over-imposing bulk.

I ask the Council to exchange further with the BCAAC (Bloomsbury Conservation Area Advisory Committee) who oversees preserving the Seven Dials Conservation Area. They have lodged 2 objections and are offering to meet with you to discuss. **I please ask the Council to engage in a conversation with the BCAAC. This is what they are for, and I am extremely keen to protect the Heritage of the area, and not just when the risk is next door to me. Thank you**

4th floor back extension and 5th floor back extension (if 5th was ever granted)

I strongly object to any 4th floor extension (wrongly approved in 2019) and any 5th floor back extension (if any 5th floor was to happen) on the basis that it:

- creates severe breaches on overshadowing the 4th floor terrace.
- it affected light in our kitchen and living room
- it blocks the outlook of the kitchen and living room window
- diminish the access to light to all other residents below.

In 2019, the 4th floor back extension was granted but on the wrong basis (and it that sense cannot be renewed):

- There is in fact a clear loss of outlook for the resident of flat 4, 158 Drury Lane with whom I stand in solidarity, and this was mis-judged by the council at the time.
- No overshadowing survey had been done at all, even though the Council had requested it in the pre-application reports. It was never produced, so the dramatic impact of the 4th floor back extension and extra floors was not assessed but, still, a decision was made, based on incomplete data.

Past applications

Following some research shared, it came to my attention that the council has refused 2 applications similar in character to 2023/2245/P.

In 1077/5659/P an application for a roof extension for additional office space was refused because a 4th floor extension would be 'utterly dominant' in nearby Neal Street.

Also application 2019/3133/P in Farringdon Road was where very extensions to the main bulk and the rear of the building would be "excessively dominant and overbearing to the detriment of the visual amenity....contrary to policies D1(design) and D2 (Heritage)...

There are significant similarities and I trust that the Council will remain consistent.

2nd floor terrace

I call upon the Council to refuse the proposed 2nd floor terrace on the basis that the flat roof was recognised as not being an amenity (Section 7.29; 11-Jun-2019 Delegating report written by John Diver) and "for emergency only" in 2019.

I object to the 2nd floor terrace out right, and I know, through the CGCA comments, that even tight conditions cannot be policed. The impact of the 2nd floor terrace will be devastating to many residents on different fronts: noise disturbance, privacy issue, overlooking issues....

A condition was even imposed in 2019 on this space to "**Safeguard the amenities of the adjoining occupiers** at 158-159 Drury Lane, 8-16 Parker Street and the area generally in accordance with the requirements of policies G1, A1 and A4 of the London Borough of Camden Local Plan 2017".

The context and policies have not changed since this assessment was done so this assessment needs to stand in 2023.

Please note that in the design statements, the developer mentions "*Rear terraces: the existing terraces at the rear of the building offer opportunity for improved amenity. An existing large terrace is located at 1st floor level. It is a private terrace for the 1st floor occupants. There are currently no tenants on this floor and the terrace is therefore not currently in use. Additionally, the terrace provides a transition between the external fire escape tower and the final fire exit via the adjacent Market House property. There is a small external terrace at 4th floor. It is currently not in use.*

Both 1st and 4th floor Drury Works spaces have not been terraces. The 1st floor terrace has never been used in the past decade, as witnessed by all residents, and the 4th floor is not even accessible and not safe in its current form as it has a very low parapet. This is why a massive protective casing has been put around the access of the fire escape at the 4th floor level.

In summary:

I (and other residents) have I believe strong grounds for objections, all based on facts, data, policy and history.

I thank you in advance for considering in great detail all my points, the collective ones from Friends of Parker Street, and all the personal objections from fellow residents. I have faith in you and my Council for refusing the application as it is and working with the applicant to amend the scheme so that the impact on the amenity of the residents will be minimised and the heritage of the area preserved.

And finally, it would be easy for people to think of us as NIMBYs. Please consider the project and please think about what the public good is. Yes, the Council gets a one-off small funding contribution. **But for our community there is nothing that can't be achieved with a standard refurbishment.**

We are looking to build and protect our community. As of today, the community has a lot to lose from the proposed scheme and I am looking to the Council to protect the community (incl. my family and I)

Thank you for your consideration.

Kind regards

Erwan

Flat 6 (4th floor 3 bedroom and 5th floor self-contained studio annexe), 12 Parker Street, London WC2B 5PH

PS: please find attached the final Updated 23-Jul-23 Core Objection from Friends of Parker Street dated 23rd July + Right Of Light Consulting report + the drawing "REVISED PROPOSED NORTH EAST ELEVATION"