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info@CoventGarden.org.uk

www.CoventGarden.org.uk

Enya Fogarty
Planning Officer
London Borough of Camden
5 Pancras Square
London N1C 4AG

via: Planning@Camden.gov.uk & Enya.Fogarty@Camden.gov.uk

20th July 2023

Dear Enya,

Re application ref. 2023/2245/P, redevelopment and extension
of corner 'Drury Works' building at 160-161 Drury Lane, London WC2B 5PN

As the amenity society for the area, Covent Garden Community Association strongly objects to this application.

We support the idea of some work being done to upgrade the current building. We are also not opposed to an improved arrangement on the top floor. However, we believe that elements of the current proposals are not the right solution for the context.

We attended the applicant's presentation in March. We provided detailed feedback in, April, suggesting mitigations for some of the potential negative impact of the proposals. We met with the developers and with local residents in May. Unfortunately, the developers were not open to modifying their proposals in the interests of their neighbours or the streetscape. They have submitted to you essentially the same scheme as initially proposed, and they know that we must object to it.

We ask that you require the applicant to add our suggested modifications and mitigations to his plans before granting permission for alteration of this building.

Please note that we comment on the new plans in relation to the existing building. Planning consent ref. 2019/2095/P is not a relevant benchmark as it has now expired and applicable LPA policies have changed.

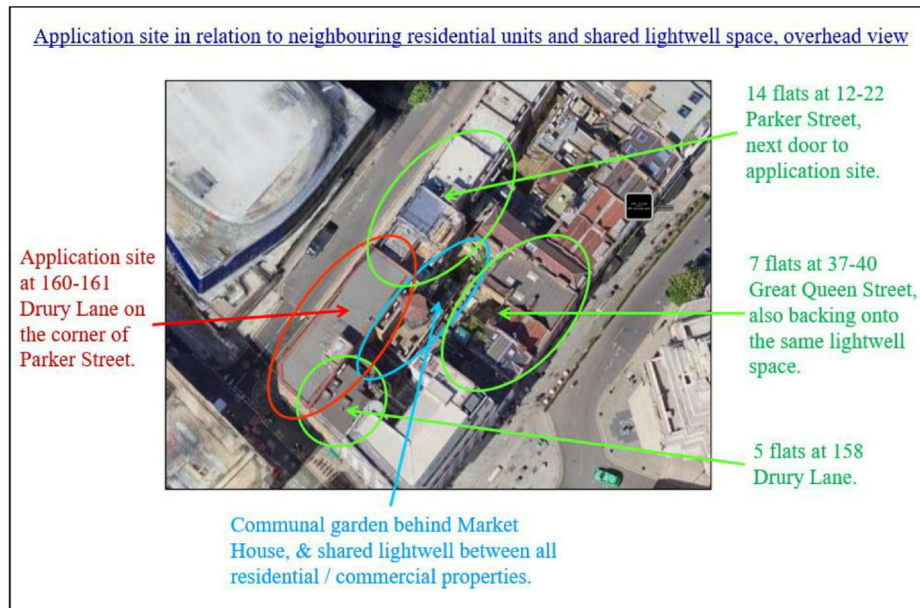
CONTEXT

Uses and shared rear space

The context of the wider area is generally mixed use, but Parker Street is predominantly residential - even at ground floor level, which is unusual for Covent Garden. On Parker Street there are 7 flats at Market House, immediately next door at numbers 12-18, many of which are for families, with Ruspini house having 7 more flats next to it. There are 30 flats at Parker Mews opposite, and about 50 more flats further down the street.

On Drury Lane there are 5 flats at number 158, immediately next door. On Great Queen Street there are 7 flats immediately behind the application site at numbers 37-40.

As shown in the overhead view below, a key feature of this context is that all these properties share the same lightwell space with the application building, part of which is the communal family garden for the flats at Market House. What happens in the application building has an impact upon the lives of all the people living here in terms of noise, overlooking, fumes and daylight.



Design

The building is gently Postmodern in design, with characteristic features such as exaggerated window keystones all along the front elevations at third floor level, and swollen columns along the ground floor frontage. The design ties in closely with its neighbours on Parker Street, built at the same time by the same architect: Market House and Ruspini House at 12-22 Parker street.



Streetscape

The building presents a prominent corner on Drury Lane by virtue of a) its height and b) its bulk on the Parker Street (North West) side.

CONCERNS & POINTS OF OBJECTION

Roof extension to 4th and 5th floors

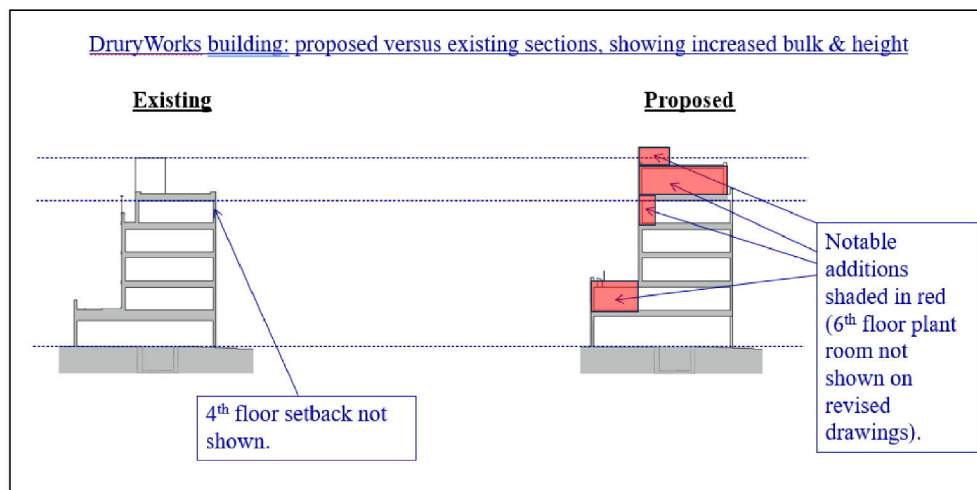
Height

The current building is already higher than its immediate neighbours on both Drury Lane and Parker Street. Adding further height would produce a more uncomfortable relationship with those adjoining buildings.

Adding another floor would alter the building's relationship with its wider context, too, making it more incongruous and dominant in the townscape. It already forms an appropriate corner on Drury Lane and greater height would increase its prominence significantly.

The current 4th floor is approximately 1.5m lower than the (small) tallest roof on the same side of Parker Street; we imagine that the 4th floor upward extension and an additional 5th floor would render the height at least 3 metres above the tallest roof on this side of Parker Street. This is before consideration of the proposed rooftop plant, which would add even more height.

There would also be a considerable build up on the party walls, highly visible from the South on Drury Lane and the East on Parker Street.



Frontage

The design of roof extension involves a revised 4th storey, extended upwards and pushed forward to the main building line, and a new 5th storey slightly set back.

Please note that the section provided on the exhibition boards (as shown in the comparative drawings above) does not show the existing setback, and we cannot see the existing 4th floor frontage setback on the application drawings; **we ask that the existing drawings be amended.**

The loss of setback on the 4th floor presents a less sympathetic addition to the streetscape, particularly on Parker Street where its width spans an extensive 10.5 bays. Together with the 5th storey, the proposed elevations to both streets and the corner result in a cliff-like prominence.

It may be useful to refer to the development diagonally opposite on Drury Lane and Dryden Street. This went through many design iterations before being approved by the LPA (WCC) under application reference 18/07715/FULL. An important modification that made it acceptable was the roof extension being reduced to a mansard above 30-35 Drury Lane and 4-10 Dryden Street.

Rear

Extension of the 4th floor by almost 2m at the back, the addition on a 5th floor slightly recessed, and the addition of rooftop plant on top of that, would all have a negative impact on the residential units behind the building.

There would be loss of light to properties on Great Queen Street and Drury Lane, to some properties on Parker Street, and importantly to the communal garden to the rear of Market House which is a precious amenity space for families in that building. This is detailed in the report by Right of Light consulting dated 14/07/23.

There would be damage in terms of outlook, and loss of privacy through increased overlooking. And there is likely to be more light spill.

Policy issues

Factors relating to the height and frontage design, described above, mean that the 4th and 5th floors as proposed, detract from the character of the conservation area, which is not in accordance with Camden's Planning Policy D2 (Heritage). They are specifically contrary to paragraph 3.9 of the Planning Guidance 2021, taking into account the need to preserve and where possible enhance that character.

The amenity factors described above mean that the 4th and 5th floor as proposed are not in accordance with Camden's Planning Policy D1 (Design). They are specifically contrary to paragraphs 5.12 and 5.13 of the Planning Guidance 2021, taking into account the effects of the proposal on the amenity of adjacent residential properties with regard to daylight, sunlight, outlook, light pollution/spillage, privacy - and noting that a roof addition is likely to be unacceptable where the impact on adjoining properties and amenity of neighbours would be detrimental.

Pro

posed compromise relating to Roof extension to 4th and 5th floors

We would not object to an appropriately designed roof extension on the building, involving:

- A modest increase in the height of the current 4th floor to enable upgraded modern office use if needed, but with no increase in footplate, retaining a set-back at the front, and

- A new 5th floor designed as a sloping mansard including plant, set back considerably from the frontage to minimise visibility from the street and set back considerably at the rear to avoid amenity issues such as loss of light. Importantly, **it would also need to be set back at the sides** so as to prevent increased build up on the party walls which is detrimental to the streetscape, and to protect the amenity of the closest flat at 6 Market House whose window and terrace looks directly at this wall.

First & Second floors

The proposed extension at the rear of the First floor would have a negative impact on neighbouring residential units. In particular, the flats immediately adjoining in Market House would suffer significant loss of light and privacy.

There would be loss of light to properties on the ground to second floors of Parker Street, the first and second floors of Great Queen Street, and to the communal garden to the rear of Market House which, as mentioned above, is a precious amenity space for families in that building.

There would be damage in terms of outlook for properties on the first and second floor of Parker Street and Great Queen Street. And there would be more light spillage and loss of privacy, which are not likely to be able to be mitigated by planning conditions in this location because the proposal on the first floor is so much closer to its neighbours than further up the building.

The proposed terrace would cause the same harms, but more seriously, especially in relation to loss of privacy. Importantly, it would also lead to noise nuisance for all residents surrounding this enclosed space. This is not in accordance with Camden's Planning Policy A1 (Managing the impact of development). It is also specifically contrary to paragraph 5.18 of the Planning Guidance 2021 requiring roof terraces not to result in overlooking of habitable rooms of adjacent residential properties.

We therefore have to object to any extension at the rear of the building and any outside recreational space for workers at the rear or sides of this building.

If the LPA were minded to grant consent for a rear floor roof terrace despite these harms, some mitigation to the noise and overlooking issues could be achieved by:

- High-level fencing and planting around the perimeter of any terrace.
- Hours of use of any outside space reflecting normal office use, ie: Monday to Friday 9am to 6pm only.

However, there is no way to mitigate the issues relating to any first floor rear extension and believe that this should be refused.

Ground floor

Frontage

We can understand the security reasons for pushing forward the building line at ground floor level, and agree that all recesses should be eliminated. However **we believe that it is desirable to retain some element of the colonnade that characterises the Postmodern design**. A bas relief that replicates the front portions of the existing columns (perhaps protruding 10cm at the foremost point) could be used, for example. This would also maintain this element of the design link to the columns on neighbouring buildings on Parker Street.

Regrettably, we find the proposed treatment of the ground floor frontage overly dominant and out of keeping with the building and streetscape.

It emphasises the greater height of this building's ground floor over that of its neighbours, distorting the proportions of each street elevation. We would welcome a finish in brick or muted render, as currently, to preserve a more subtle distinction.

Use classes

We do not object to the relocation of the main office door to Parker Street, but **we would ask for a Planning Condition to protect against more intensive use classes on this part of the building later**, ie: Class E(g) only.

We do not object to café use on part of the ground floor accessed from a corner door, but to preserve neighbouring amenity **we ask for a Planning Condition restricting hours of use**. The applicant has given an example of a desirable operator, whose existing site has acceptable hours. We suggest hours within 08:00-19:00 during the week, 09:00-19:00 at weekends. **We would also ask for Planning Conditions restricting delivery times** to 08:00-19:00 during the week only, and requiring no primary cooking on site.

Refuse and bicycle storage

The proposed location of the entrance to storage facilities is directly beside dwellings in Market House. This is likely to lead to disturbance from people bringing bikes in and out, contractors bringing bins in and out, from people talking and shouting, and from doors slamming. There may also be smell. All this would be taking place very close to residents' living rooms and bedrooms.

We ask you to relocate the storage access point, preferably onto Drury Lane where the levels of background noise from traffic etc. act as an acoustic cushion and where there are no ground floor residential neighbours. This is the current location.

Ventilation

The building is excellently served by windows to the front and rear. In the interests of sustainability we ask you to require the applicant to consider natural ventilation rather than the use of air conditioning equipment. If a huge building like Space House on Kemble Street (by Kingsway) can do this, then so can Drury Works.

We hope that our feedback is helpful. We request that you reject this application, subject to its being modified in the ways that we ask, as above, to deal with the harm that it would otherwise cause.

Yours sincerely,

Elizabeth Bax
Chair, Planning Subcommittee

