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**CAMDEN COUNCIL**

Town Planning Department,  
London Borough of Camden  
2nd Floor,  
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London,  
WC1H 8EQ

Your Ref: 2023/5366/P  
Our Ref: 1293  
26<sup>th</sup> January 2024

Dear Edward Hodgson,

**2023/5366/P | UNIVERSITY COLLEGE SCHOOL, FROGNAL, CAMDEN, LONDON, NW3 6XH**

NTA Planning LLP have been appointed by the proprietors of No30. Ellerdale Road, to objectively assess the development proposal under application 2023/5366/P at the above site. No.30 Ellerdale Road lies to the immediate west of the application site and in our view, is directly impacted by the proposed development.

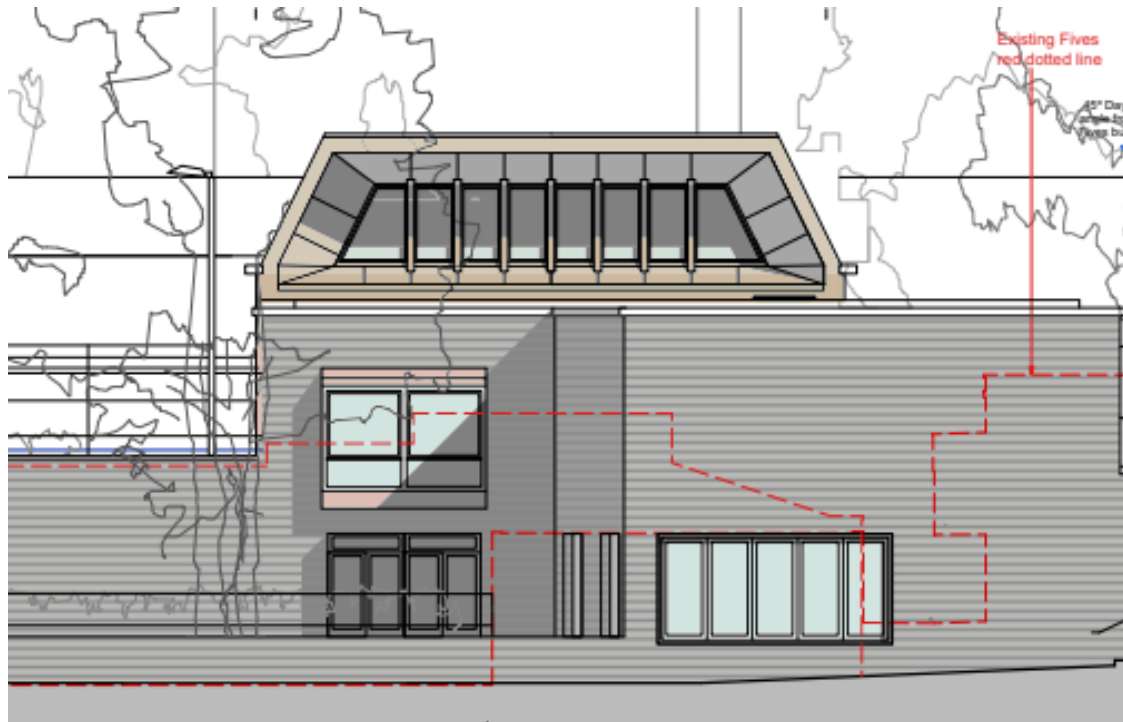
Whilst the proprietors of no.30 Ellerdale Road are pro-development, they also firmly believe that the right development should be proposed in the right place. Having objectively assessed the application proposed, we must register an objection to the scheme on our client's behalf.

The main issues of consideration are:

- **Excessive height of the Recital Room**
- **Light**
- **Noise**

**EXCESSIVE HEIGHT OF THE RECITAL ROOM**

Having reviewed the proposed drawings submitted in this application, the proposed Recital Room development raises concerns, notably due to its excessive height. Especially when the Recital Room is referred to as a 'special double height space' and the submitted DAS refers to the space as a 'double plus height space'. It is proposed that the roof extends over 7 meters from the existing building line outlined by the dotted red line, as outlined below, which is approximately double the existing height:



Camden's 2021 Planning Guidance on 'design' aligns with Policy A1 from Camden's Local Plan (2017), emphasising the importance of high-quality design. The pivotal principle of 'Context and Character' underscores the need for a sensitive and integrative approach to development. It specifically requires special consideration to mitigate any adverse impacts from the proposal on the amenity of adjacent residential properties regarding daylight, sunlight, outlook, light pollution, and privacy.

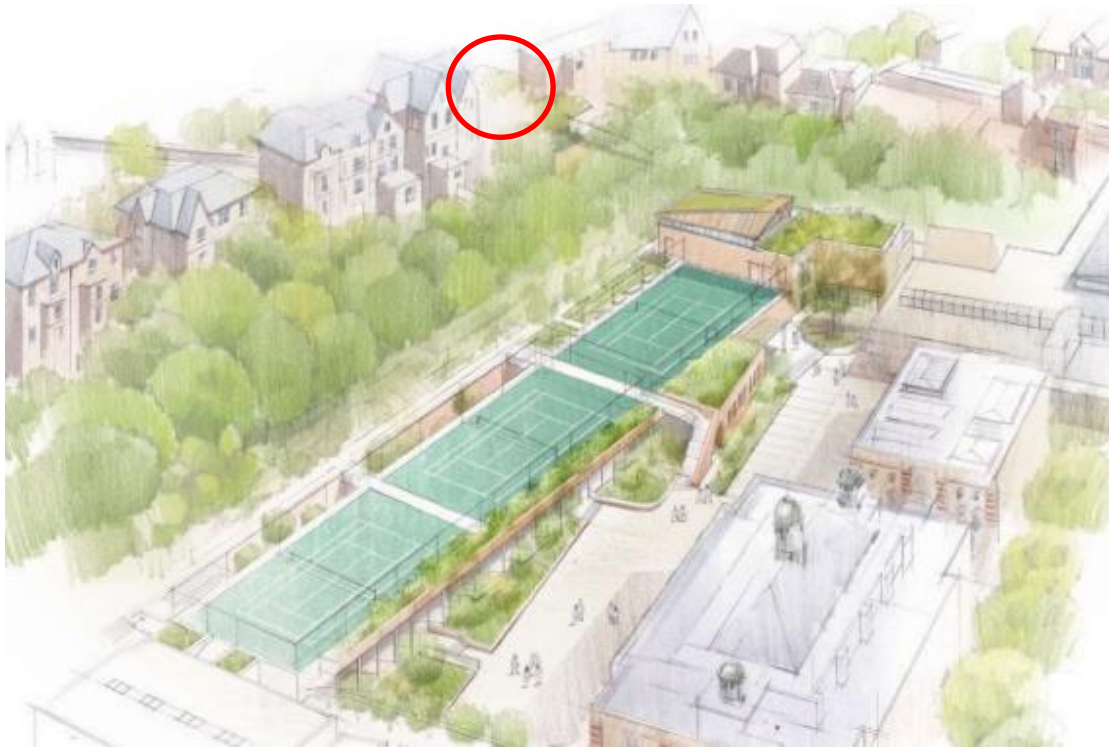


In our view, the proposed development has not adhered to this specific design principle, as the height appears excessive and does not only disrupt the visual harmony of the surroundings but also directly impacts our client's residential dwelling. The development height should be carefully considered, emphasising the need to preserve the visual integrity and quality of life for affected residents in the evaluation of the proposed development.

Furthermore, is the sloped roof a functional necessity, or is it solely a design element flourish. The DAS infers that the height is associated with the need for improved acoustics however given the established and dense urban context of the site, it is considered that the impact of the height should be given priority over the schools aims for improved acoustics. It is noted that the sloped roof seeks to optimise natural light into the space, however we have concerns with the south facing nature of this, and the potential impacts for overheating, resulting in the need for either additional plant for active cooling, or the potential for opening doors/windows, resulting in other amenity impacts which is discussed later. The addition of a flat roof with skylights could prove more effective while also being visually less obtrusive and impactful on neighbouring properties.

The illustrative drawing submitted with the application conveniently overlooks to include our client's dwelling and the neighbouring property, the ones closest to the highest point of the development and would be materially affected by its increased height. Essential details have been omitted, leaving a

crucial gap in the illustration. This oversight impacts the Council's ability to assess the full extent of the development's impact on the immediate surroundings. Clarity in representation is paramount for an accurate evaluation of the proposed project.



The Google Maps image below provides clear identification of our client's dwelling and the adjacent property. The aerial view offers a comprehensive perspective, allowing for a more accurate assessment of their proximity to the highest point of the development. This additional visual information below serves as a valuable complement to the incomplete representation in the provided drawing, enhancing our understanding of the potential impact on the closely situated residences.

It is our view that the overall height of the proposed extension should be reduced, which would still allow the applicants to achieve their aims of the development, but in a more considerate manner.



## **LIGHTING**

Policy A1 of the Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours, and seek to ensure that the amenity of communities, occupiers and neighbours is protected and require mitigation measures where necessary. This includes artificial lighting levels.

The Policy notes that Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. Artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours. Developments in sensitive areas should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife. For further information please see our supplementary planning document Camden Planning Guidance on amenity.

The Camden Amenity CPG (2021) further notes that excessive or poorly designed lighting can cause light spillage and glare and be damaging to the environment by having a detrimental impact on the quality of life of neighbouring residents, changing the character of the locality. Sports facilities use very bright lights to ensure regulations from associated sporting bodies are met. The Council will therefore expect that the design and layout of artificial light be considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbours in terms of visual privacy, outlook, and disturbance. All light installations should be energy efficient and 'Dark Sky' compliant, not causing obtrusive light pollution, glare or spillage and preserving a sensitively lit night-time environment.

Accordingly, it is concerning that the lighting strategy remains undefined, and only as concept stage, according to the submitted documents. This is particularly important given that all tennis courts will be elevated compared to the existing levels and set within what is a dense urban context.

The submitted documents show the Play / Sports and Tennis court area is to be provided with 8 tennis court lighting posts of approximately 8 metre height. These will be very visible from neighbouring properties and will cause harm.

The application documents state that timing of external lights will be agreed with Camden Council, to encourage use for sports while protecting neighbours' amenity. This is a critical matter for the adjoining residents.

In our view the lighting strategy should be fully defined, along with confirmed hours of operation at this stage and should consider all parties directly impacted. The applicants have submitted some information in relation to lighting, and potential spill of light which does show encroachment into the rear gardens of neighbouring properties, the assessment should also have regard to the overall glow/upward spillage of the light that would be emitted from the courts. The adjoining residents will see an illuminated sky from their rear windows and gardens, which is worsened over the current position.

It is essential that this is quantified, and that the usage does not run late into the evenings which would cause concern.

## **NOISE**

Policy A1 of the Local Plan also notes that the Council will seek to protect the quality of life of occupiers and neighbours, including noise levels.

Noise can have a major effect on amenity. Policy A1 notes that the World Health Organisation (WHO) for example states that excessive noise can seriously harm human health, disturb sleep, and have cardiovascular and behavioural effects. Camden's high density and mixed-use nature means that

disturbance from noise is a particularly important issue in the borough. When development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application.

The Amenity CPG further notes that principally, in order to manage leisure noise, the Council will consider the use of planning conditions to control aspects such as opening times; amplified music; and restrictions on times where outdoor standing/seating areas can be used. All of these should be applied in this case.

In line with Local Plan policies TC4 and C5, the Council should also consider the use of management plans secured through a section 106 legal agreement, which should include elements principally seeking to manage noise off-site.

There are three principal issues in relation to noise, 1) the potential impacts from The Recital Hall, 2) associated plant noise, and 3) the extended and intensified usage of the external courts.

1) The submitted documents notes that a double plus height volume is proposed for the Recital Hall, to bring a long reverberation time. It is noted that full band recitals are expected in this space, as well as similar and ancillary operations. The proposed operation hours are assumed to be Monday to Sunday 7:00 – 23:00, which is also understood to accommodate potential concerts. However, it is unclear as to whether there has been any consideration towards opening windows, or doors, which will of course raise the potential for noise spillage etc, and therefore impacting on neighbouring amenity. It is common for Concert Halls and Recital Halls to overheat due to their high need for insulation and noise mitigation measures, and the large south facing window proposed, could cause concern. We would want to avoid a situation where additional plant would be required for mechanical cooling and an alternative to natural colling.

2) With regard to plant, the submitted documents refer to a high quality of acoustic and fabric design that will ensure that there will be minimal noise breakout from plant or interior teaching and music spaces, not exceeding Camden limits which are sealed and mechanically ventilated. The two main plantrooms are located internally behind retaining walls as are the external air-source heat pumps at the north end. Their proximity to adjoining residential properties are a concern, and their emission levels should be controlled by condition.

3) Regarding the external courts, exterior noise from pupils on the play/ sports and tennis court sports and play roof area will be different to existing, despite what it asserted in the submitted documents. Whilst pupil numbers will not increase as a result of this development, the change in level of the courts is approximately 1.5 metres higher than existing, which will change the behaviour of sound leaving the site.

The use of the elevated courts includes for many sports and for general break-time games, PE and socialising. UCS Active health club will also make use of the tennis courts on the project site, available for club members. The Club utilises these spaces out of School hours, and during weekends and holidays. An approximate timetable includes for school use - before the start of the school day, Monday to Friday from 7:30-8:30am used for practice: Monday – Rugby; Tuesday – Tennis; Wednesday & Thursday – Basketball; Friday – Tennis. During the school day, Monday to Friday, 9am-4pm the courts are used for Games lessons by the Junior Branch, Pre-Prep and Senior School for different year groups. After the school day, Monday-Friday, 4-5:30pm, the Junior Branch use all 3 courts for Tennis coaching, Hockey and football. UCS Active Monday - Friday 6pm-9am all courts are in use for Tennis by local members; weekends from 8am- 8pm, the courts are in use by local members UCS Active's Tennis Programme for young children aged 3-11years old. The school also needs three Tennis courts in order to have competition fixtures with other schools – which generally have a format of 3 matches operating simultaneously.

It is clear that the courts will have continuous and sustained use without respite. The courts will be used before, during and after the school day, in and out of holidays. It is noted that the application form has

checked 'no' in regard to the question asking is Hours of Opening relevant to this proposal? However, for the reasons set out above, it is vital.

In our view, the Council should request an independent assessment of both the noise and lighting assessments that have been submitted as part of the application, to ensure that the results can be verified.

Thank you for your consideration, please do not hesitate to contact me ([og@ntaplanning.co.uk](mailto:og@ntaplanning.co.uk)) should you have any queries.

Yours faithfully,

**OLIVER GARDINER**  
PLANNER  
NTA PLANNING LLP