

# **Objection to Planning Application 2024/1364/P**

NCP Saffron Hill 14 St Cross Street

**Olivia Beasley & Henrik Knudsen**

## **8.1 The Ziggurat, 60-66 Saffron Hill, EC1N 8QX**

We would like to strongly object to the proposed development in its current form because of the mass of the structure causing:

- A sense of enclosure
- Loss of light
- Loss of sunlight
- Loss of privacy
- Overlooking to our flat
- Noise from terraces and roof plant

We have lived in this flat for 26 years, since 1998.

We work from home in the creative industries and have enjoyed the amenity of a 180° south facing aspect and uninterrupted sky views from the living room, bedroom and terraces.

We were so shocked by the proposed plans, only released this January 2024, that we made our own models from the plans and sun path timelapse films to illustrate the loss of light, sunlight, overshadowing and mass of the building which is out of all proportion to the existing building and those on either side. See next page.

The developer refused to give any views at mid and higher levels, so we used our own in a slideshow presentation to the developer at the meeting on 19.02.24 showing the impact to the Ziggurat Building. Although they purported to have held consultation on the project, the truth is they have been evasive and haven't released information when asked. We were disappointed to see that our concerns weren't taken into account, and no changes were made to the submitted application plans after the meeting.

The proposed building will increase the current building height by 4 floors. Please see plan on page 3.

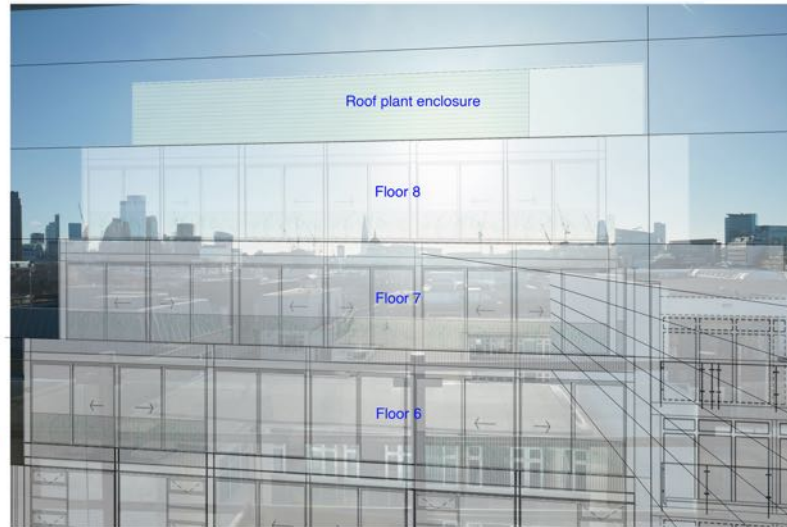
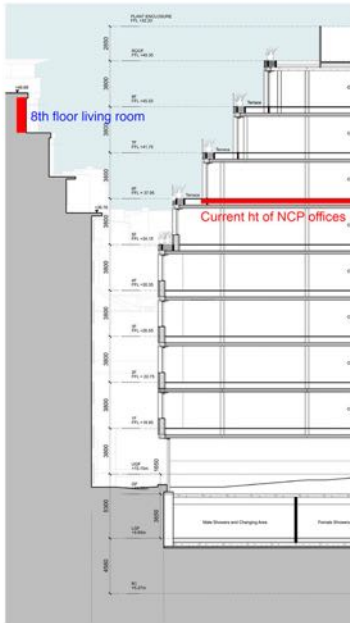
The enjoyment of our uninterrupted south facing aspect is an important part of our residential visual amenity. The visual impact on all our living areas will affect our living conditions and wellbeing as a tangible experience as we are both visual artists reliant on the light. The impact is unacceptable to us.

The proximity, size and scale of the proposed development should be refused.

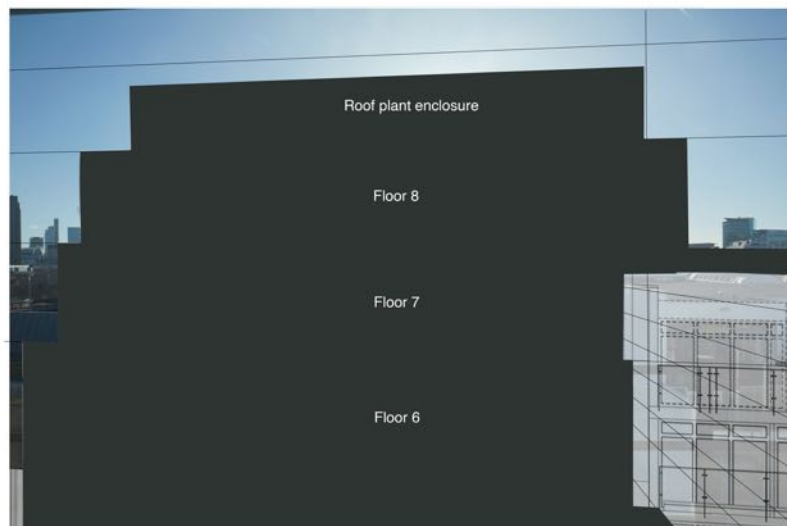
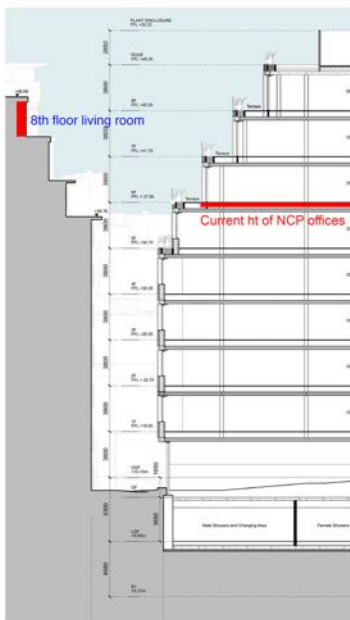
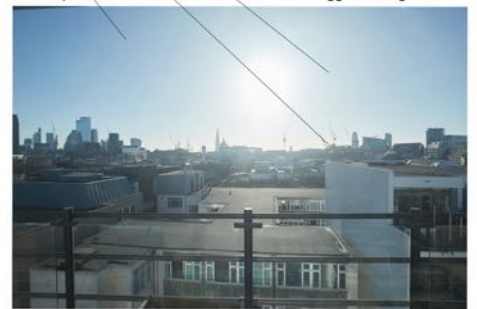
If the proposed building was reduced in height to the same height as the current car park offices, the plant enclosure was relocated, the balconies were removed it would be more acceptable.

We understand and welcome redevelopment in the area to improve amenities. We feel that these plans in their current form are overbearing, and the height and sense of enclosure will greatly harm neighbours' lives in the future. Many residents have lived in this building for more than 20 years and it's a close-knit community who will be greatly affected by the proposed development.

# Viewpoint from 8.1 Ziggurat of proposed plans 22068 Saffron Hill drawings 230124



Sun position at 10.28am 26.01.24 8.1 from Ziggurat living room



Sun position at 10.28am 26.01.24 8.1 from Ziggurat living room



This architectural elevation drawing shows a section of a building facade on Saffron Hill. The drawing includes several buildings with varying heights and styles. Key features include:
 

- Leftmost building:** A multi-story building with a prominent balcony on the upper floor, featuring a decorative railing and a small cupola on the roof.
- Second building:** A taller building with a series of windows and a flat roofline.
- Third building:** A building with a series of windows and a flat roofline, adjacent to the second building.
- Fourth building:** A building with a series of windows and a flat roofline, adjacent to the third building.
- Rightmost building:** A building with a series of windows and a flat roofline, adjacent to the fourth building.

 Elevation markers are provided throughout the drawing, indicating heights in feet and inches. The ground level is marked at 0.00. The drawing is oriented with the street frontage at the bottom.

Architectural elevation drawing of a building facade, likely a residential or commercial structure, showing multiple stories and various architectural details. The drawing includes annotations for materials, finishes, and structural elements.

**Annotations and Details:**

- Plant Screen:** Coloured Plant Screen (Green/Teal) with Vertical Planting.
- Boundary Wall:** Concrete Finish.
- Spandrels:** Anodised Aluminium Bronze Toned Finish.
- Spandrels/Partings:** Anodised Aluminium Bronze Toned Finish, Aluminium Foiled Metal.
- Facade Secondary Frame:** Steel Frames, Painted in Resinous PPC, Bronze Toned.
- Windows:** Composite windows with aluminium frames externally finished in Resinous PPC, Bronze Toned.
- Ground Floor Shopfronts:** Steel Frames, only on cycle and bin store doors; Bronze Toned Resinous PPC.
- Ground Floor Shopfronts:** Timber Frames.
- Ground Floor Plans:** Fair Faced Concrete.
- Ground Floor Plans:** Fair Faced Concrete.

**Structural and Material Callouts:**

- PLANT ENCLOSURE: FCL +42.20
- ROOF: FCL +43.35
- ST: FCL +45.55
- ST: FCL +47.75
- ST: FCL +37.95
- ST: FCL +34.15
- ST: FCL +36.35
- ST: FCL +38.55
- ST: FCL +22.75
- ST: FCL +18.95
- ST: FCL +15.15m
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- ST: FCL -346.65m
- ST: FCL -348.45m
- ST: FCL -3

As the developer refused to submit any visualisations at mid and higher levels to Camden Planning Dept or the stakeholders, Ziggurat Freehold Ltd commissioned Verified Views. The Verified Views show the impact of the development to flats on the 5<sup>th</sup> to 8<sup>th</sup> floors of our building. The full document will be included in the Ziggurat Freeholder’s objection.

The image below shows the Verified View from the living room flat 8.1 on the 8<sup>th</sup> floor.

**0.1 Introduction**

Rendered Image Ltd was commissioned by Ziggurat Freehold Ltd to complete the verified views contained in this document. The viewpoints have been selected through a process of consultation with Ziggurat Freehold Ltd.


**0.2 Methodology Overview**

The methodology applied by Rendered Image Ltd to produce the verified images or views contained in this document is described below. In the drafting of this methodology and the production and presentation of the images, guidance has been taken from:

- The Landscape Institutes Visual Representation of Development Proposals Technical Guidance Note 06/2019
- Third Edition of the good practice Guidelines for Landscape and Visual Impact Assessment 2013
- The GLA London View Management Framework: Supplementary Planning Guidance 2012
- The disciplines employed are of the highest possible levels of accuracy and photo-realism which are achievable with today’s standards of architectural photography and computer-generated models.

**0.3 Lens Selection**

Using a 50mm focal length prime lens offers the best match for a human eye. The verified views in this study have been created using a 24mm to offer additional context. The Landscape Institutes Visual Representation of Development Proposals Technical Guidance Note 06/2019 (1.1.7) recommends using the 50mm FL lens unless it cannot capture the view.


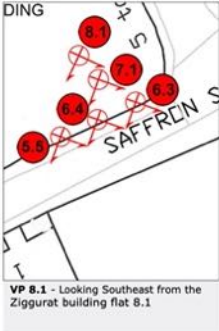



Rendered Image Ltd, 86-90 Paul Street, London EC2A 4NE  
+44(0)20 3808 8234 enquiry@renderedimage.uk  
www.renderedimage.uk

Verified View - Type 4, Level 3

1262 Saffron Hill Verified View

Proposed View 8.1



VP 8.1 - Looking Southeast from the Ziggurat building flat 8.1

Camera Level 1.6m | 24mm lens | 12:01 | 2024/03/28

Camera Location Photograph

Document Date 9 May 2024

20240509\_1262\_Saffron\_Hill\_Verified\_View\_Study\_L3\_A3 | Page 17 of 18



At present, there is no overlooking to our living room and bedroom from the car park and offices as the roof height is two storeys below us. The proposed development will dwarf us. The offices, all with accessible terraces, will overlook our living areas, bedroom and terraces. Our windows are floor to ceiling so there will be no escaping from the invasion of privacy especially as we are here day and night.

Image from Verified Views 24mm lens 12.01 2024/03/28



Image based on Verified View of proposed development from 8.1 Ziggurat



At night, or from 15:30 in the winter months, we have a dark and peaceful outlook from our living room and bedroom above. The developer has proposed mitigation measures like blinds and timers, but in reality, the terraces have been designed to be used and we feel that these measures can't be enforced, and, in the evenings, we will be overlooked, it will be noisy, and we would lose our privacy and amenity.

010524 Existing night-time view from livingroom 8.1 Ziggurat



010524 night-time view from livingroom 8.1 Ziggurat proposed development

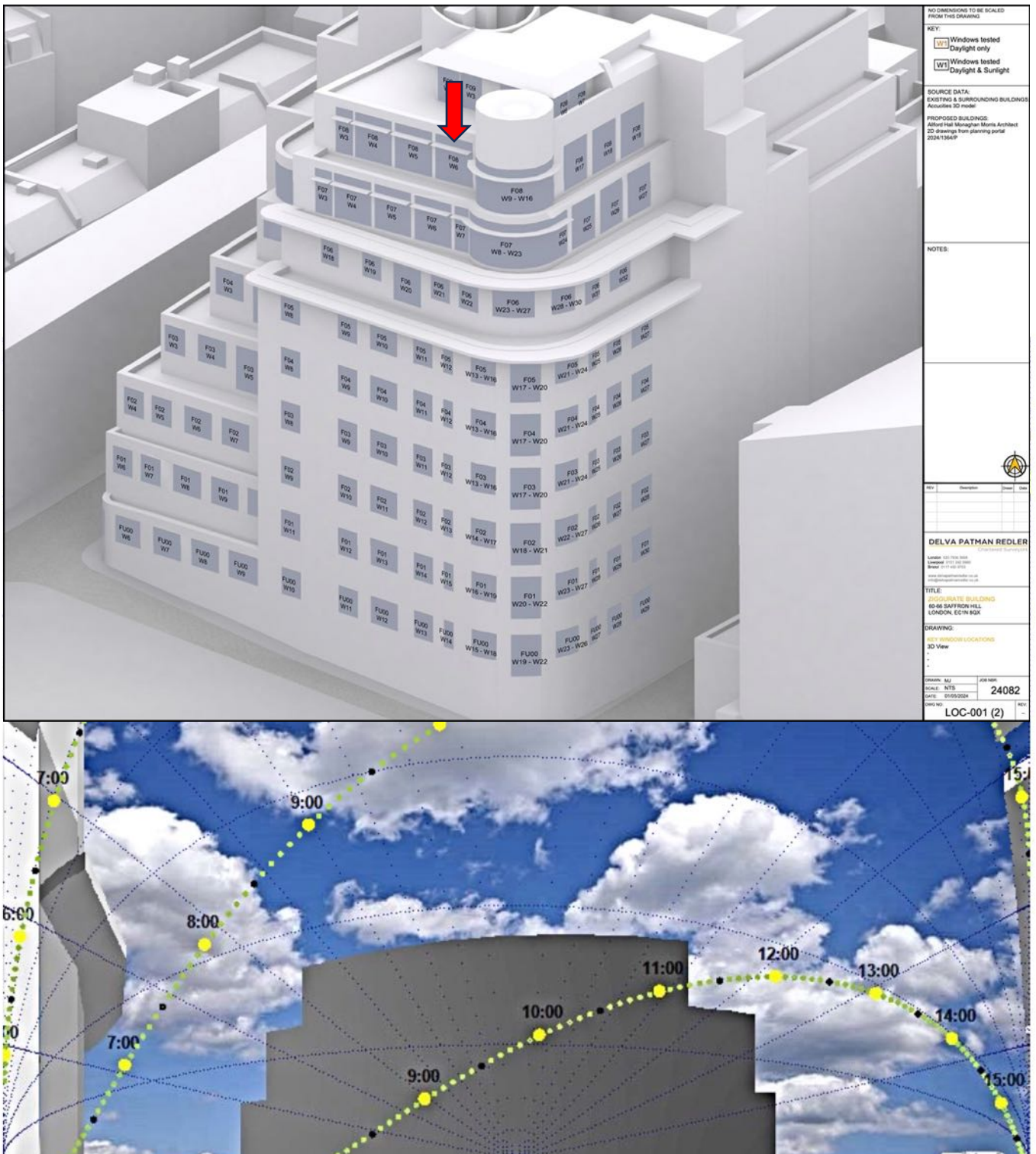




In the Point 2 Daylight and Sunlight Part 1, 6.34 report, it states ‘It is acknowledged that there will be some loss in winter sun to individual windows that exceed the BRE guideline numerical targets, which is not uncommon in built-up urban environments where winter sun is more sensitive and building to building relationships make access to direct sunlight in winter more challenging’.

Also in 8.11, ‘It has been demonstrated through detailed overshadowing assessments the Proposed Development will give rise to **no alteration in direct sunlight availability to neighbouring external amenity spaces, namely the roof terraces serving the Ziggurat Building**’.

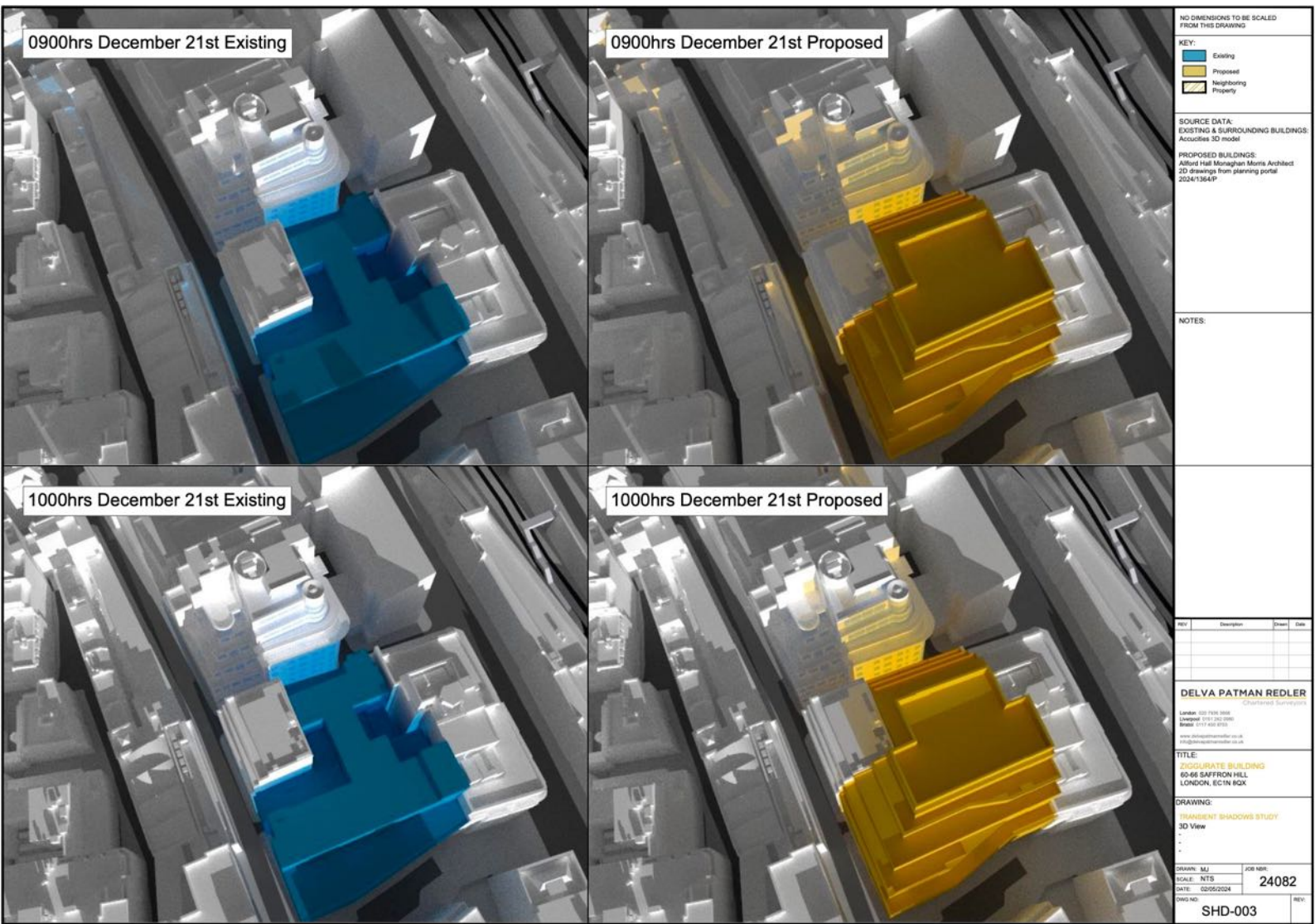
This statement isn’t true. The Daylight & Sun path report below commissioned by Ziggurat Freehold Ltd demonstrates that during the winter months, the sunlight to our amenity including rooms and terraces will be entirely blocked for the whole morning period.



The developer has provided an overshadowing assessment for its own development but not for our building, as it is clearly detrimental to the proposal.

This Transient Shadow Study was commissioned by Ziggurat Freehold Ltd to model the loss of daylight and sunlight on the south facing floors of our building. It compares the existing car park in blue with the proposed new building in yellow. This example modelled on the 21<sup>st</sup> December would put our facade in shadow through the winter from October right through to the end of March.

We are very lucky to have direct sunlight in our flats. Depriving us of that amenity during the winter months where sunlight is crucial, is irreparably damaging and cannot be mitigated. The impact on all our living areas will affect our living conditions and wellbeing.



One aspect that isn't highlighted in the documents is the overall width of the building on Saffron Street. Much is made of the height and mass, understandably, but planning officials should also be aware of the width. At nearly 23 metres, the frontage extends beyond the whole length of our flat including the terraces. In fact, we have had to use wide angle photographic lenses to try and take in the full extent of the mass and the proximity of the planned building.

The result of this is that even with the stepped back floors, our south facing living area with floor to ceiling windows and full-length terraces is completely blocked of light, sunlight and view from one end to the other.

We'd like to reinforce the fact that 'enjoyment of a view' is an important part of the residential amenity of this property, and its loss will therefore have an adverse impact on our residential amenity.



Through the winter months, November – March, winter sun streams into our living areas giving much needed light and warmth. The photograph taken on 26.01.24 at 9.25am shows the difference between the bright room we have enjoyed for 25 years and the effect of the proposed development completely blocking the sunlight from our southern aspect.





Flat 8.1 Ziggurat. Photograph taken on 26.01.24 at 10.56am showing current sunlight in living area in comparison to same area without sunlight. This winter sun will be completely lost by the proposed new development. This picture was taken towards the end of January, the effect would be more acute in December.





In the applicant's Planning Statement, it is claimed that the Council's Planning Officers are in favour of the development as proposed.

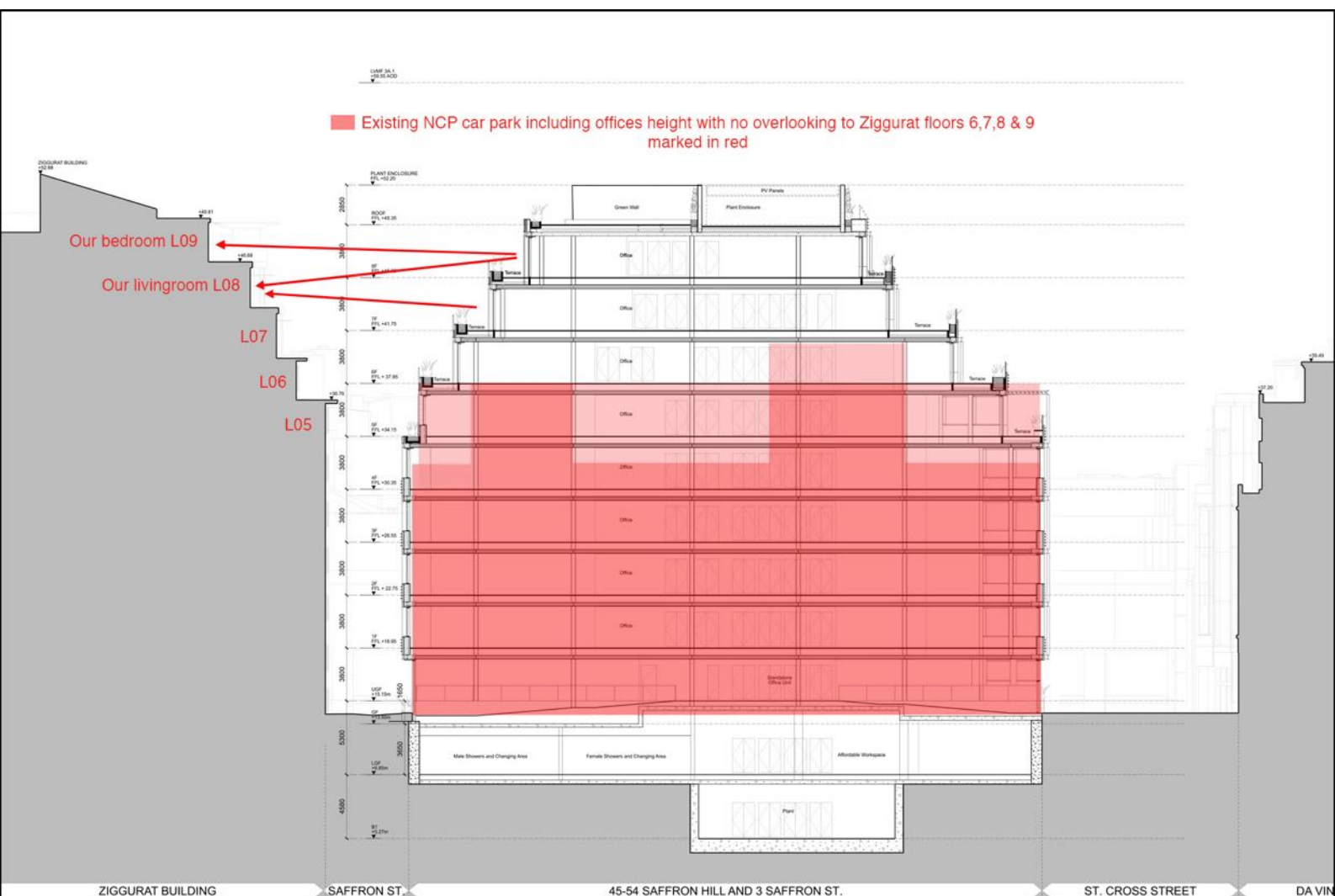
4.12. 'The pre-application process concluded with officers praising the proposed development and level of engagement, and supporting the submission of the planning application'.

Having read the pre-application advice this is clearly far from the truth.

Part of the actual pre-planning advice is 'There is a concern due to the increase in height and massing, certainly on the upper floors that there will be significant impact on outlook, overlooking, loss of sunlight and daylight and an increased sense of enclosure for the neighbouring buildings'.

As correctly predicted in the Camden pre-planning advice, there is a significant impact on outlook, privacy, loss of sunlight and daylight and increased sense of enclosure.

As you can see in the diagram below, the area marked in red is the current car park and set back offices above. The proposed building increases the height by 4 storeys including plant enclosure, 3 with accessible terraces directly to the south of our living room and bedroom windows.



The 2.85m height of the plant enclosure on the roof is the same height as an entire additional storey. Together with the upper floor offices, it will take away light and sunlight from our flat and although the planning application states the plant will be regularly serviced, our direct experience of roof plant in the area is that it is noisy, and alarms often go off at the weekend and the responsive Camden Noise Unit will have to be called out to address the nuisance. There is no reason why a full storey height roof plant should destroy a neighbour's visual and aural enjoyment of their amenity. A reduction in height of the overall building could easily be achieved by relocating the machinery to an alternative position.

We'd also like to draw to your attention to the 4.0 Architectural Design 4.18 Stakeholder Engagement height explanations. The Ziggurat levels have all been incorrectly labelled from pages 139 – 153 in the DAS report. Level L08 is in fact L09 on the ninth floor down to L05 which is labelled L06. In the 4.18 2. Review of enclosure and relationship with neighbours, the LG level is sited well above ground.

The Townscape Strategy Plans have also been incorrectly referenced as well.

As all the floor levels on the Ziggurat have been incorrectly labelled, it gives a false representation of the height relationship between the two buildings.

This careless approach by the Planning Applicant has an impact on the residents of the Ziggurat. L09 is my south facing bedroom.

We have read the Planning Application 2024/1364/P carefully and have found many inaccuracies and obfuscations in the documents designed to advance a more positive view of their proposal.

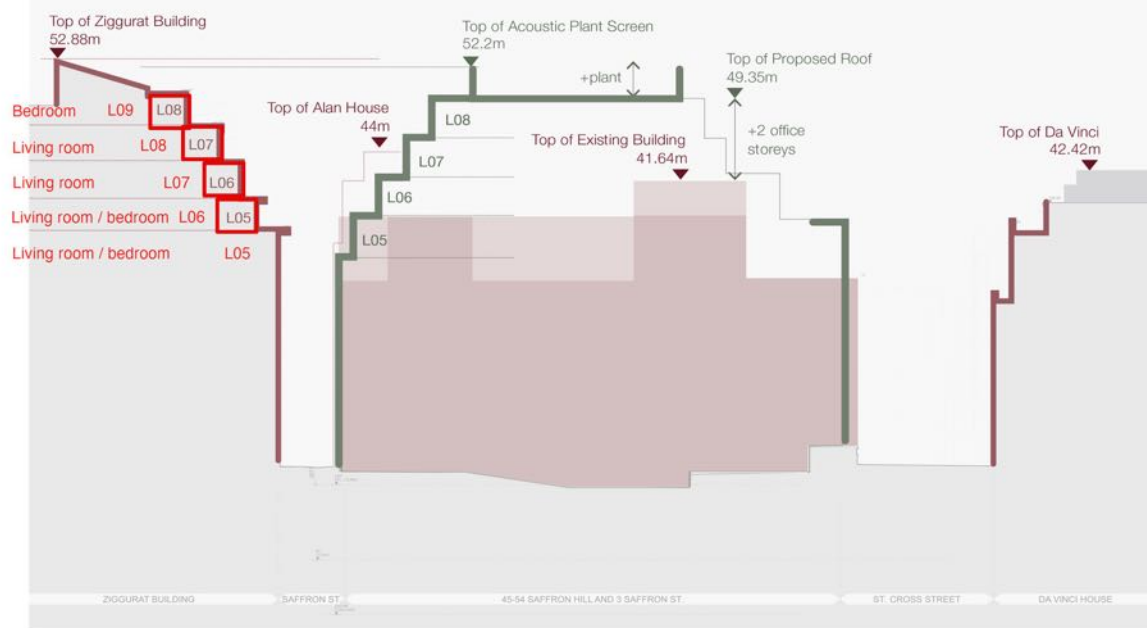
## 4.0 Architectural Design

### 4.18 Stakeholder Engagement

#### 1. Existing vs. Proposed height explanation

Step 4: Introduce an acoustic plant enclosure, with vertical greening. The proposed acoustic enclosure will comply with International, national and local policy, as well as building regulations for both normal plant noise levels and emergency plant noise levels.

#### Incorrectly named Ziggurat levels in all the 4.0 Architectural Design Stakeholder Engagement Plans & Townscape Strategy Plans



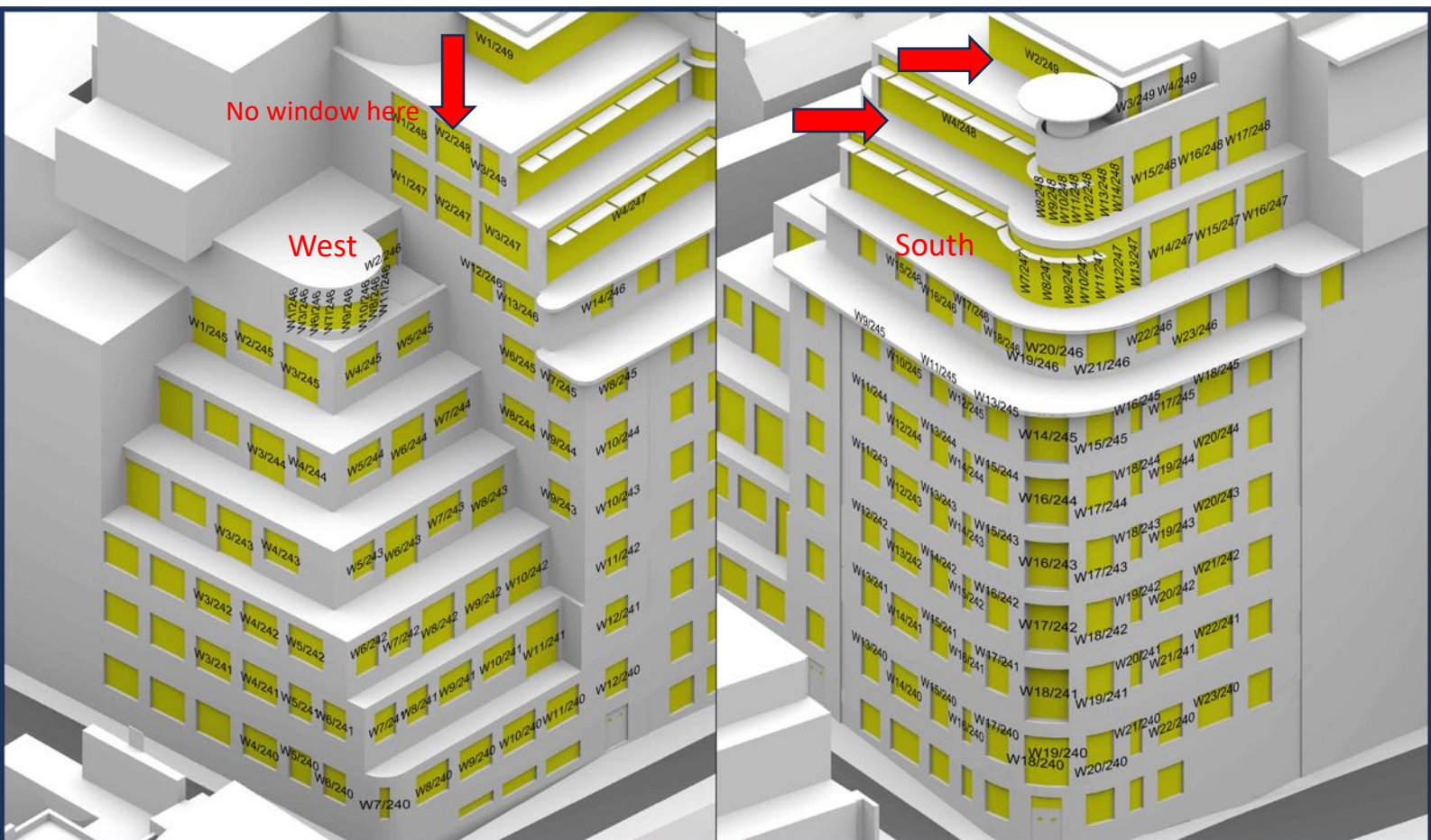
Using the drawings included in the Planning Application, we have measured the terraces on the 6<sup>th</sup>, 7<sup>th</sup> and 8<sup>th</sup> floors of the Saffron Street facade of the proposed building and estimate that the terraces would be c. 3.3 metres in depth. Even taking the perimeter planters into account, this is a wide area meant for use with outdoor amenities such as tables and chairs – essentially an extension of the office space.

If the terraces are provided, the office workers will use them to their full capacity.

From our living room and terrace, we will be looking straight out onto the the full-length terraces on floors 7 and 8 with no privacy. Once the offices are let out to tenants, they will definitely use the terraces as they receive late sun in the evenings.



In the Right of Light Contours P3173/WM/01, the south facing elevation below has no identifiable window position numbers attached to the 7<sup>th</sup>, 8<sup>th</sup> and 9<sup>th</sup> floors although the evaluations are set out in the tables. Why aren't the W4/248-W7/248 windows identified? This is a living room not studio with bedroom above.



Sources: Point2  
Point Cloud Survey  
Site Photography  
Local Planning Authority  
Various Surrounding Building Layouts/Massing  
AHMM (Received 21/09/23)  
230807\_P2 Context Model\_AHMM Massing\_v2.dwg

Key:

Project: Saffron Hill, London

Title: Rights of Light Contours  
Proposed Scheme  
Ziggurat Building

Scheme Confirmed:

Date:

Drawn By: NB/CJ

Scale: 1:200

Date: Sept 23

Dwg No: P3173/WM/01

Rel: 16

Point 2 Surveyors Limited, 17 Slingsby Place, London, WC2E 9AB | 0207 836 5828 | [point2.co.uk](http://point2.co.uk)

POINT

DAYLIGHT						
Room	Room Use	Window	Mirror VSC	Proposed VSC	Loss	%Loss
R1/248	STUDIO	W4/248	23.10	21.67	1.43	6.19
R1/248	STUDIO	W5/248	10.76	10.58	0.18	1.67
R1/248	STUDIO	W6/248	18.21	17.87	0.34	1.87
R1/248	STUDIO	W7/248	28.40	27.42	0.98	3.45
R1/248	STUDIO	W8/248	32.02	30.29	1.73	5.40
R1/248	STUDIO	W9/248	32.77	30.54	2.23	6.81
R1/248	STUDIO	W10/248	33.16	30.81	2.35	7.09
R1/248	STUDIO	W11/248	34.03	32.01	2.02	5.94
R1/248	STUDIO	W12/248	35.01	33.70	1.31	3.74
R1/248	STUDIO	W13/248	36.12	35.56	0.56	1.55
R1/248	STUDIO	W14/248	38.93	38.73	0.20	0.51
R1/248	STUDIO	W15/248	39.04	38.91	0.13	0.33
R1/248	STUDIO	W16/248	38.23	38.13	0.10	0.26
R1/248	STUDIO	W17/248	34.16	34.08	0.08	0.23
R1/249	ASSUMED	W1/249	31.00	30.98	0.02	0.06
R1/249	ASSUMED	W2/249	31.40	30.42	0.98	3.12
R1/249	ASSUMED	W3/249	32.85	32.79	0.06	0.18
R1/249	ASSUMED	W4/249	32.62	32.56	0.06	0.18



On closer examination, the Contextual Daylight Study Part 2 analysis undertaken by Point 2 in the Farringdon area has many flaws using buildings that bear no relationship in size and aspect to the Ziggurat.

The study was undertaken to prove that many local buildings have low light values across their facades, but the buildings chosen are not comparable to the Ziggurat.

On the Saffron Street facade, 4 of the 9 floors at the Ziggurat are 180° south facing with completely unrestricted light, sunlight and view.

P3173/FS/1 sites a derelict 3 storey building with a tower block blocking its SE aspect.

P3173/FS/3 uses an inaccessible lightwell.

P3173/FS/4 uses a 3 storey NE facing building.

P3173/FS/8 the Montgomery Building in Onslow Street is referenced against our larger, east facing facade.

Although it is claimed that the analysis was carried out **'walking the streets and reviewing the building-on-building relationships that exist first hand'** many buildings and roads have been incorrectly named and in one case a comparison was made with a hotel, not a residential building.

We know the area well and thought the buildings chosen misrepresented the light study analysis.

We have photographed the actual buildings at street level on the map provided by Point 2 including the orientation of the facade and reviewed their size, position and aspect.

These errors we found in the reporting doesn't give us much confidence in the overall presentation of facts throughout the Planning Application.



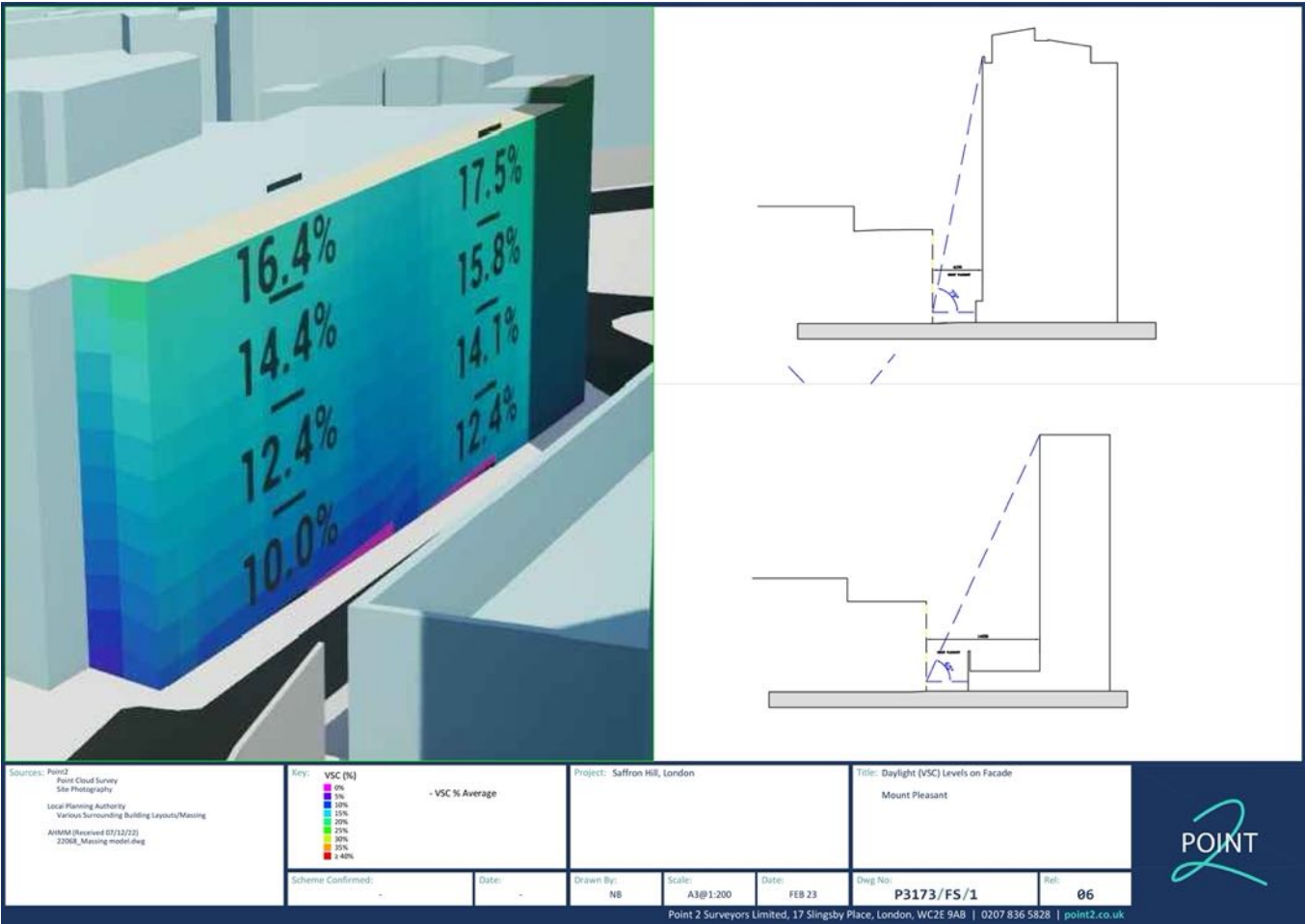
This map indicates the position of the buildings analysed in the report.

We have made an alternative list below of local residential buildings that are a similar size and aspect to the Ziggurat.

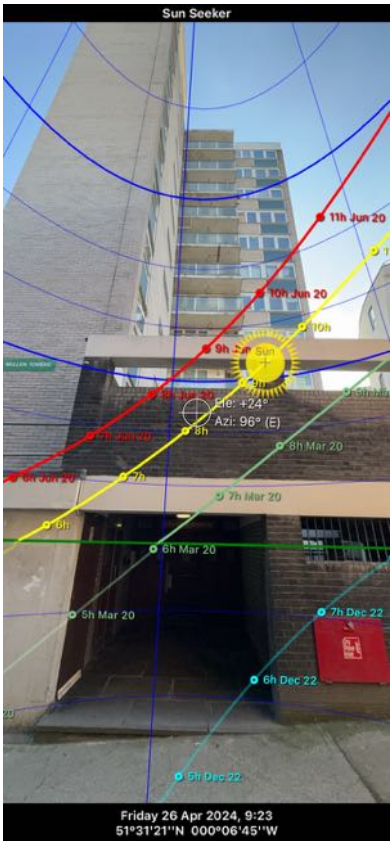
15 Clerkenwell Close, SE facade, Warner House, 43-49 Warner Street, SW facade, 206-212 St John Street, front SW facade and the Postmark Building, Phoenix Place.



Contextual Daylight Study Part 2  
P3173/FS/1 below, sites a derelict 3 storey building with a tower block blocking its SE aspect.

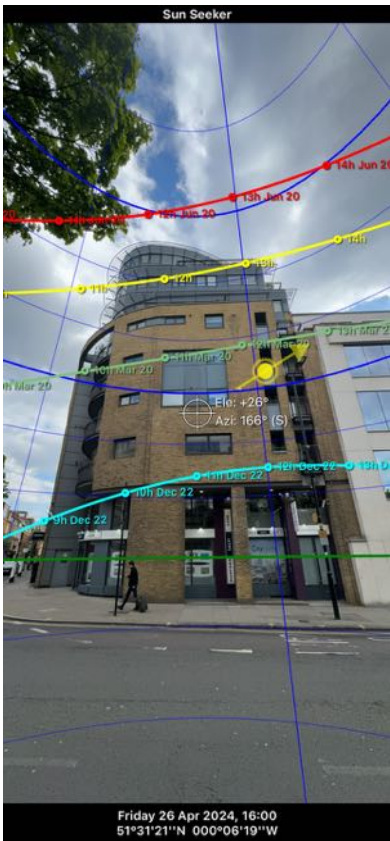
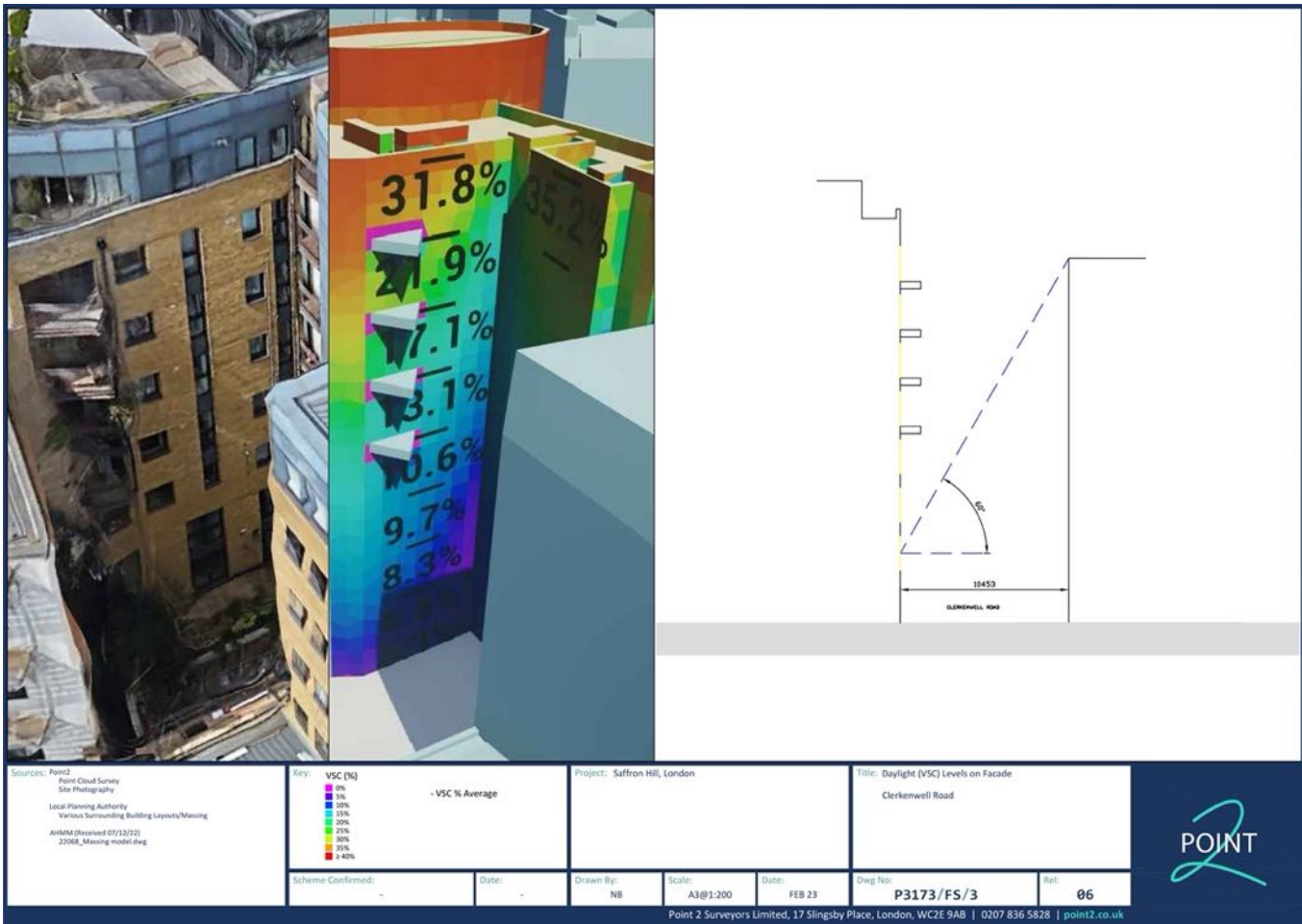


Actual building modelled is Panther House, Mount Pleasant 99° SE



Tower block blocking the SE aspect to Panther House, Mount Pleasant 276° W

Contextual Daylight Study Part 2 analysis undertaken by Point 2.  
Incorrectly named – this is Millennium Heights, Britton Street not Clerkenwell Road.  
Inaccessible lightwell behind the building not the facade on Clerkenwell Road. See map below.



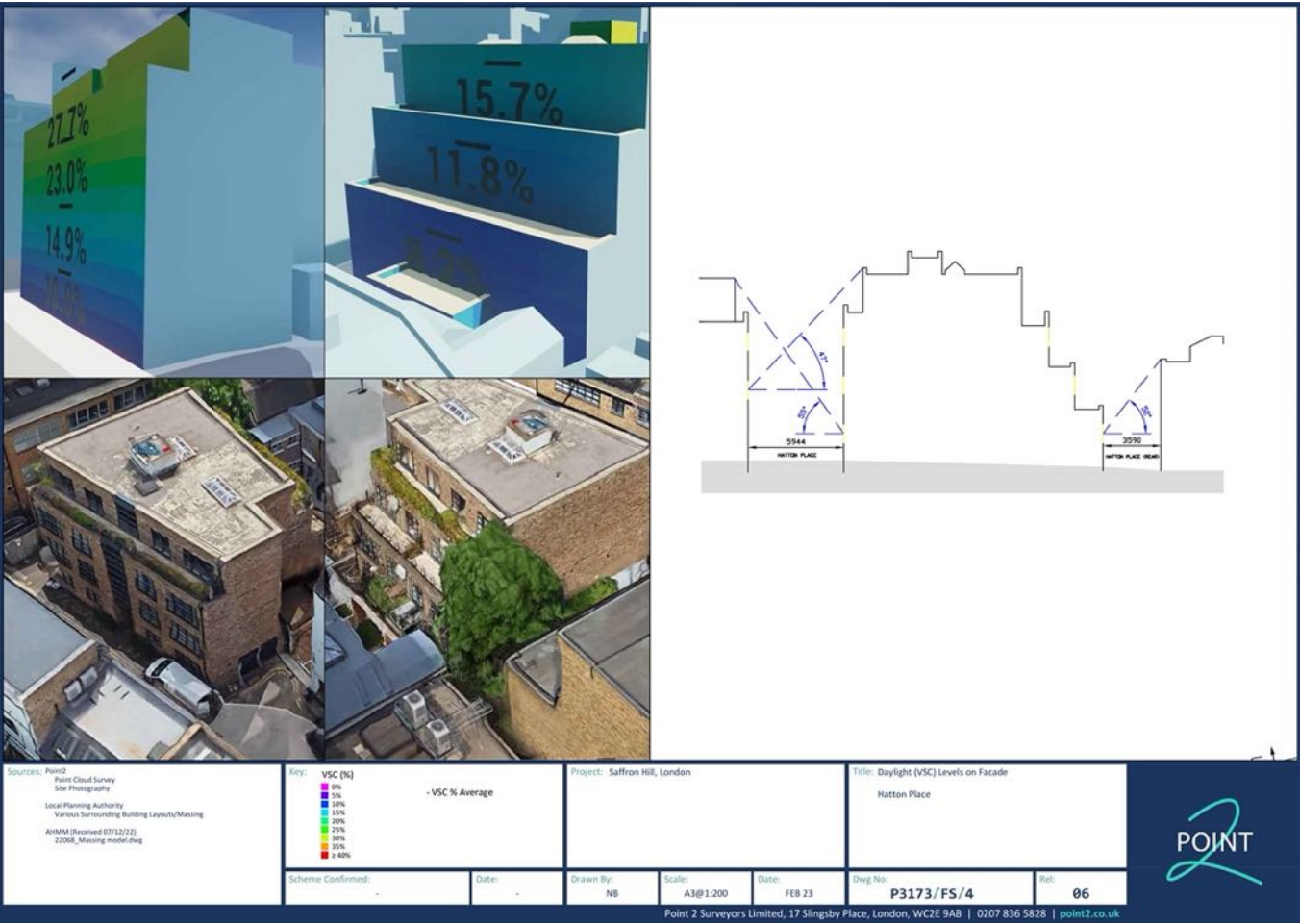
Millennium Heights,  
Clerkenwell Road  
viewpoint – not used  
in analysis  
346° NW



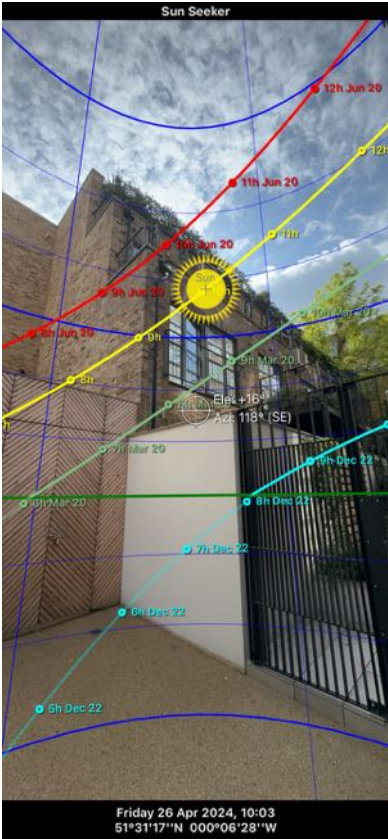
Actual site  
Millennium Heights,  
inaccessible internal  
lightwell used  
instead of facade



Buildings that bear no relationship in size and aspect to the 9 storey 180° south facing Ziggurat Building.  
P3173/FS/4 sites a 3 storey building with a NE facade.

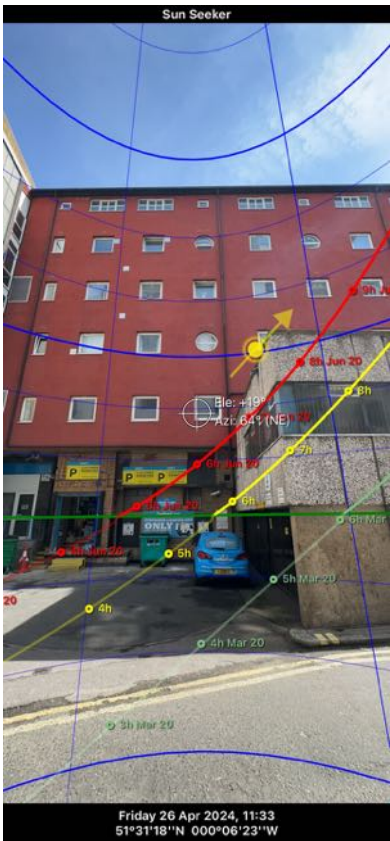
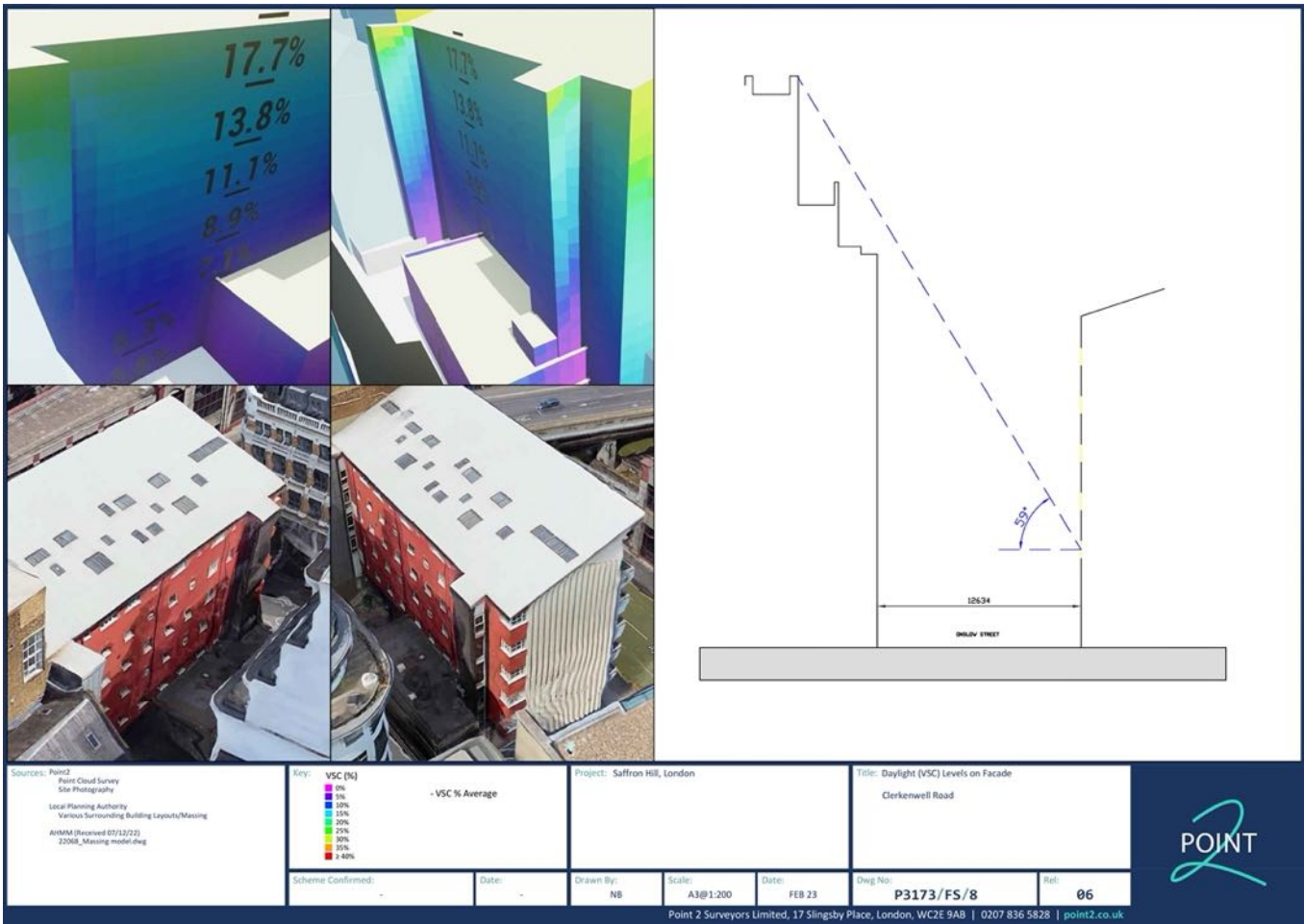


17 Hatton Place  
Facade of 3 storey  
building  
56° NE



17 Hatton Place  
Rear viewpoint,  
3 storey building  
236° SW

Contextual Daylight Study Part 2  
P3173/FS/8 below, misnamed Clerkenwell Road is the rear of the Montgomery Building from Onslow Street. The east facing, 9 storey facade of the Ziggurat is used as the comparator.



Rear of Montgomery Building, Onslow Street viewpoint 244° SW



4.0 Architectural Design 4.13 Servicing Strategy

Increasingly, the Saffron Street/Onslow Street axis has become very congested. It services vehicles to and from Leyland SDM, Service Graphics Creative Production, Steelcase and the Ziggurat car park and Ziggurat service and fireman’s lift used for removals, bulk deliveries and access for emergency Fire Services.

With motorbike bays on one side of the Farringdon Road/Saffron Street junction and builders pulling off Farringdon Road to buy from Leyland, it is a very tight right turn into Onslow Street for lorries.

If all the deliveries and services for a 600-person office space were also added in, the congestion would cause lorries and vans to stack up blocking Saffron St, Onslow St and Farringdon Road.

We have already seen this many times over the last month even without the extra traffic from the new building.

We don’t feel that the promised small electric vehicles, and bike deliveries to a building that size is very realistic.

Plan of Saffron Street, Onslow Street and Farringdon Road



Servicing location for deliveries and collections



Onslow Street delivery



Saffron Street



Saffron Street aerial view



In conclusion, as has been expressed before, we are not against development on this site, but any proposal should be a reasonable plan taking into account the points we have mentioned above.

As a result, we have no option but to object to the current application on the grounds stated.