

Dear Sir or Madam, at Camden Planning Department:

I'm writing to you to object to the application 2024/1364/P

I am of the opinion that this proposed development is a phase of transition from a highly utilised and viable carpark to temporary offices before being converted to apartments. This would significantly increase the value of the building.

I have resided in the Ziggurat Building since its redevelopment in 1996. My apartment (2.4) is situated on the second floor of the Ziggurat Building and previously benefited from south-facing light and even the sun during the summer. However, this enjoyment has been diminished over the years as a result of the addition of additional floors to the building at the intersection of Saffron Street and Farringdon. Currently, the development at the intersection of Saffron Street and Saffron Hill, which is only a few metres from my principal windows facing Saffron Street.

Proposed Massing

The present proposals involve the addition of three additional floors and a plant room at the roof level to the existing car park and upper-level offices. The architects misled the public during their initial consultations by asserting that they were reducing the 12-story building to nine floors. However, they were actually counting half-floors that are connected by ramps. The building is actually six stories, and the four additional stories are disproportional to the current structure and out of context with the immediate neighbours. It is actually massive and overbearing due to the extremely narrow Saffron Street, which is barely broad enough for one car.

In fact, the comparison of the existing and proposed sections from the planning application clearly demonstrates that a stump would be created, an eye sore between two comparatively high-standard designs, particularly the building on the corner of Saffron Street and Farringdon Road (77-79 Farringdon Road). The developer of our building, who also developed the building at the intersection of Saffron Street and Saffron Hill (59 Saffron Hill), ensured that the elevations along Saffron Hill were consistent. The section previously mentioned plainly demonstrates that the development site is nearly the same height as the two adjacent buildings, and a maximum of one additional floor and four as proposed should be permitted. This would enable the three buildings that face the Ziggurat across Saffron Street to be of equal height.

Additionally, the extant buildings in the adjacent context appear to have a communality height, as evidenced by Davinci House at 42.42m, Alan House at 44 metres, and Ziggurat Building at a similar height prior to the recent addition of flat 8.1. Consequently, the vacating NCP carpark should be limited to a maximum of one additional floor, as it is 41 metres in height.

Proposed Elevation to Saffron Street

Additionally, I have examined all of the previous and current application sets and have been unable to locate any illustrations that illustrate the 25-degree test/rule, which is implemented when the window is located opposite the development. It would be evident that the fenestration in the current proposals does not confirm in the event that these are provided. Local authorities should have implemented these assessments when reviewing planning applications.

The following tests are covered:

Daylight to Windows

- Daylight Provision

Sunlight to Windows

- Exposure to Sunlight

Overshadowing

- Overshadowing to Gardens and Open Spaces

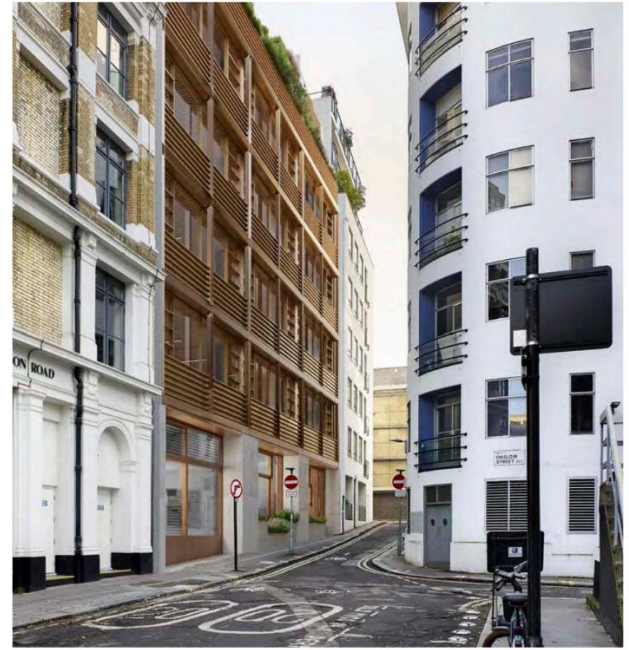
The experiments detailed in this fact sheet are derived from the Building Research Establishment (BRE) document "Site Layout Planning for Daylight and Sunlight: A guide to good practice" and are highly pertinent to the planning of daylight and sunlight. Consequently, the windows in the proposed development that are currently facing precisely north (at our building) should be recessed and oriented towards the east or west. The Westminster planners ensured that the existing car park was replaced with a seven-story stepped extension clad in glazed terracotta with a cross-laminated timber (CLT) frame and planted terraces on every level when examining another project by the architects Allford Hall Monaghan Morris (AHMM) for Metropolis at Dorset Square. The stepping commences immediately following the ground floor retail units. It is logical that the same process should take place in Saffron Street, where the adjacent buildings are situated at an even shorter distance from the development proposals. Additionally, there was a green wall on the lower floor and additional landscaping as one progressed up the stepped elevation.



I am perplexed as to why they select examples for a mixed development, primary school, retail/office building, and three additional office buildings in their DAS, rather than a building that directly impacts the current proposals, specifically a conversion from a car park to offices. This illustrates the process of planting a green wall and stepping in order to meet the 25-degree test/rule.

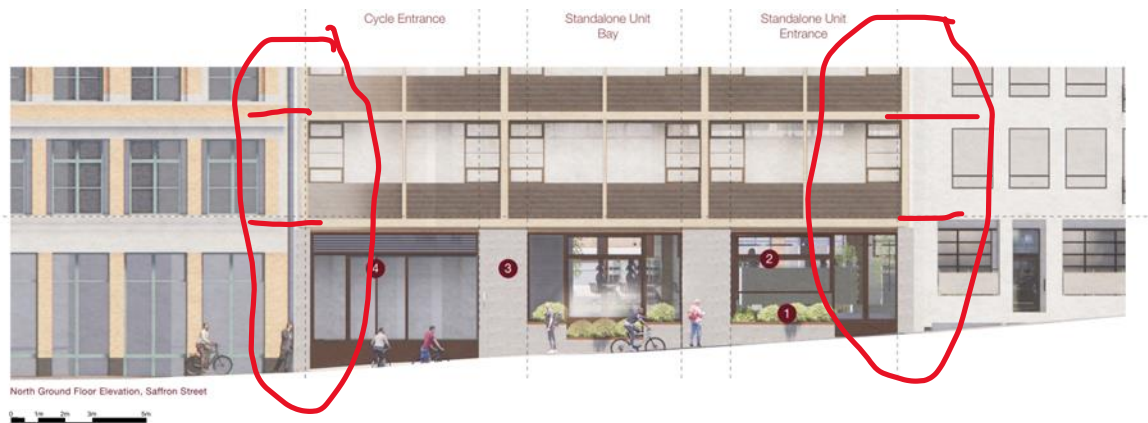


Existing



Proposed

Currently, the elevation of the car park stair is devoid of windows, as evidenced by the extant and proposed DAS views.



This verticality serves as a mediator between the elevations of the forecourt, the Ziggurat, and 77-79 Farringdon Road. Additionally, this is a blank wall, which necessitates no overhang. The developers intend to substitute this with horizontal under-window panels and expansive glazing.

The proposals and their adjacent aspects are incompatible, as evidenced by the aforementioned. There is no notion of continuity with conventional rectangular windows, as there is with the structures on either side. The proposed horizontal glazed band, which is disrupted by the configuration of smaller and larger windows, is a disorganised jumble. It is neither rectangular nor a strip, but rather an uncomfortable mismatch. The use of irregular horizontal louvres, which are arranged in a combination of horizontal and vertical framed shading measures, further complicates the situation.

Additionally, the developers' website abruptly attracts attention due to the unappealing colour scheme and the addition of four stories. Currently, the carpark is well-integrated with the adjacent structures due to the use of lighter colours and the fact that over half of the area is unglazed. However, the proposed design is atrocious. Additionally, the southern portion of the Ziggurat building will be dominated by a disproportionately large, obnoxious brown structure that dominates its surroundings. The proposals are completely out of proportion in this context, and the exceedingly large windows would provide a view of all of our apartments. As a result, I am opposed to the north elevation of the building due to the enormous windows that would directly overlook our apartments and would be prohibited by the 25-degree test/rule. Additionally, the proposed dirty brown coloration is entirely discordant with the neighbourhood. It would be recommended to reduce the number of windows to only face east or west, rather than north, and to change the colour to white, which would accentuate the gloomy passageway. Despite the architects' assertion that "lightweight and low-carbon finishes are considered, and bronze tones are considered to be sympathetic to the red brick palette of the area." Despite the fact that red brick is not utilised in any location along Saffron Street. Consequently, I would recommend that a distinct approach be implemented in Saffron Street, which has a face-to-face dimension of less than 5 metres on either side of the street. The architects also remark that the facade design is focused on optimising passive solar control. However, as previously mentioned, the north elevation of the Teriya along Saffron Street is north-facing. Consequently, an alternative approach may be implemented. The car park site's disparately different street frontages are surely not accommodated by a single size.

The developer is encroaching on our Right to Light with their current proposed design, which will result in the extinguishment of the limited sunlight we receive and a significant reduction in the amount of light. The proposed over-scaled building would obstruct light in general, but sunlight in particular.

The proposed design features full-scale windows on the north elevation of the development for five storeys, proceeding with the same windows. The window strips exceed the height of the car park aperture without windows. The controlled current ratio of opaque façade to open aperture (glazing subject to planning) should be maintained. Particularly in Saffron Street, the façade should be maintained in a light and uncomplicated manner. The profundity of the facade is modulated by the absence of a secondary facade frame, as it is north-facing and does not require solar control.

In 1994, the Ziggurat building underwent a transformation from a printer's facility to a residential block during its renovation. Thirty years later, the NCP carpark is attempting to replicate the Ziggurat Building, a structure that has never been used for human habitation and lacks windows (with the exception of a tiny portion at roof level). On page 66 of DAS, it is stated that "Step 3: Mirror the massing of the Ziggurat and maintain floors that are staggered or lowered by approximately half a storey to reduce overlooking." However, this solution resulted in the most repulsive instance of overlooking, as evidenced by the view from Allford Hall Monaghan Morris' building across Saffron Street (which shares the same design as the proposed new building).

Typical Office Floor

- Optimised 7x8m grid
- Expressed hybrid structure
- Lightweight frame and facade reducing loads on existing foundations
- In-floor services
- Exposed sprinklers & lighting
- Maximized daylight



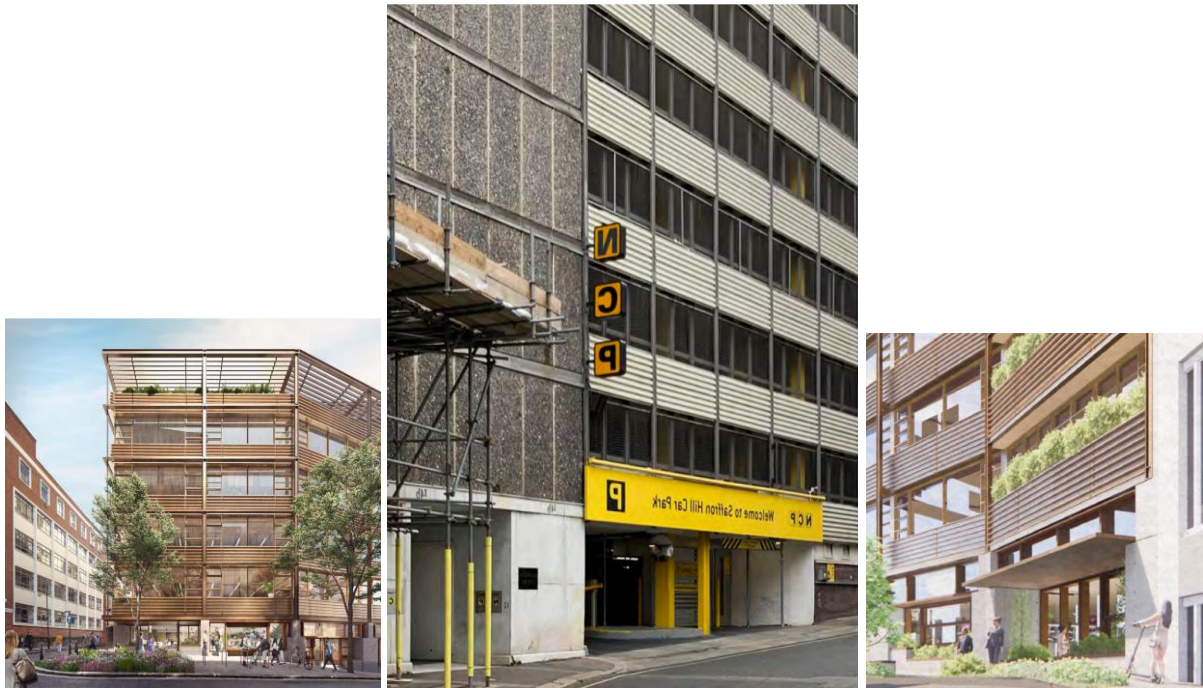
The current multi-story NCP carpark building located at 45-54 Saffron Hill and 3 Saffron Street is a highly valued and frequently utilised local asset. The loss of this facility will only serve to increase the demand for street parking and decrease the number of visitors to the area. This is particularly true given the London Museum's relocation from the Barbican to Smithfield's meat market, which will result in an increase in the demand for car parks, rather than a decrease. The area has already experienced a significant reduction in parking spaces due to the redevelopment of the NCP car park to a hotel and the loss of the NCP car park located further north of Farringdon Road. I am grateful for Policy T2 of the Camden Local Plan, which aims to create a car-free borough. However, we must acknowledge the reality of the situation. The London Museum and Smithfield redevelopment will result in an increased demand for car parking spaces in the area, as well as new tourists and visitors and adjacent stores. Consequently, I am opposed to the proposed modification of the use.

Public Realm Works

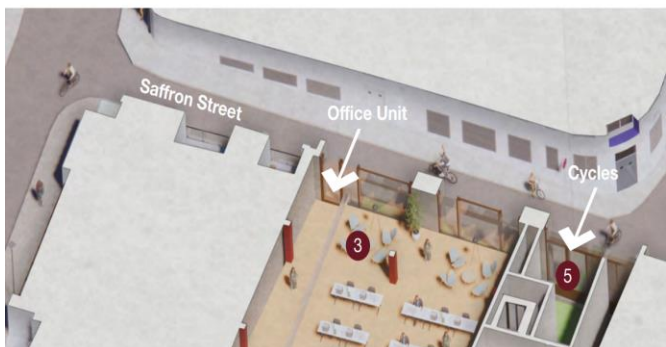
The Site's developers have made claims regarding "associated landscaping and public realm works." However, they have not received a response, despite being pursued, despite writing to them extensively. A straightforward method for them to demonstrate their conformance is to install a green wall along Saffron Street for the lower floors and subsequently lower the building significantly below the current proposal.

In their DAS, the project architects assert that "Allford Hall Monaghan Morris creates buildings that are effortless to comprehend, visually appealing, and enjoyable to function." The buildings we design are intended for a wide range of individuals to use in a variety of methods. We are committed to the creation of structures and locations that are both functional and enduring, as well as buildings that are intrinsic to their design. However, their design is a replica of a multi-story car park that was an eyesore in the mid-20th century. They have preserved the elevational articulation of the carpark in their design and, despite the fact that the locality is not a "We believe in making places as well as buildings" location, they have succeeded in creating a replica of an unappealing building that was never designed well to begin with and is a rather low-grade eyesore. They emphasise a specific group of buildings within Sub Area 5 that are recognised as beneficial to the conservation area in their DAS,

As stated in the 'Hatton Garden Conservation Area Appraisal and Management Plan', the proposed site is directly adjacent to 77-79 Farringdon Road. However, the carpark replacement design does not demonstrate a high level of contextualism or design in relation to either the Ziggurat at 60-66 Saffron Hill, which is directly opposite, or the adjacent 77-79 Farringdon Road.



replaced with glazing, and the lower register from corrugated metal sheeting with a similar material. The carpark was a series of half floors with ventilation openings and low-cost metal mesh. It appears that the design (if we can refer to it as such) by Allford Hall Monaghan Morris has not significantly evolved from a carpark constructed half a century ago. The sensation of suffocation in a tight urban infill scheme is further exacerbated by the inclusion of a higher level open mesh at roof level.



The developers are presently using a wall along Saffron Street to provide access to offices and cycle storage areas. The doors are opening and closing at a high volume. The proposed new office is situated on a street that is highly hazardous due to its width of approximately 5 metres. The increased foot traffic would result in commotion and a hazard for cyclists and office workers entering or exiting the site. I have witnessed numerous accidents or near-accidents over the past twenty-five years and personally reside across the narrow street.

I am of the opinion that these proposals are a recipe for calamity and significantly violate our rights and enjoyment of the area.

The environmental improvements on the ground in these initiatives appear to be limited to the planting of three new trees along Saint Cross Street and nothing along Saffron Street. There is a significant opportunity to create a small urban square and close off Saffron Street from Farringdon Road with Section 106, which would significantly benefit the area. Traffic could enter Onslow Street from Saffron Hill via Saffron Street and utilise it to serve the businesses and car park in Onslow Street, thereby establishing a small square adjacent to Farringdon Road that is characterised by tranquilly and vegetation. In accordance with the architects' assertion that "We believe in the creation of places in addition to buildings," this would be a warm occasion for them to contribute to the community through positive initiatives.

The Camden Council's pre app advice :-

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include visual privacy, outlook; sunlight, daylight, and overshadowing; artificial lighting levels; noise and vibration; odour, fumes, and dust; and impacts of the construction phase, including the use of Construction Management Plans.

Since the previous report the design has been developed to include glazing on all elevations and stepped elevations to incorporate balconies. As stated previous the character of the area is a tight urban grain with small distances between buildings, some of which are residential.

It is evident that this statement serves as a foundation for a variety of future planning conditions regarding the development, including:

visual privacy: I am of the opinion that the 25-degree test/rule has not been met, and if it were, it would not permit the intolerable overlooking of our residential properties from a building proposal located less than five metres away across Saffron Street.

Outlook: Similarly, our future appears grim in light of the current proposals. Our livelihoods and the future value of our flats will be significantly impacted by this proposed development, as we are severely constrained on all sites.

The case has been outlined in the developers' own consultants' DSO of daylight assessment, as well as in their architects' proposed internal perspective on the surrounding structures. I object on the grounds of reduced outlook to my flat in the Ziggurat Building resulting from the increased height of the new building compared with the current height of the car park.

Sunlight: In the same vein, the present proposals suggest that our future is bleak. This proposed development will have a substantial impact on the future value of our apartments and our livelihoods, as we are severely constrained on all sites.

The case has been delineated in the developers' own consultants' DSO of daylight assessment, as well as in their architects' proposed internal perspective on the surrounding structures. I object on the grounds of reduced sunlight to my flat in the Ziggurat Building resulting from the increased height of the new building compared with the current height of the car park.

Daylight: The current car park building will be reduced by nearly two-thirds with the proposed four new floors. The right to light is a legal easement that safeguards the access of property owners to natural light. It guarantees that the light penetrating a property's windows is not substantially

obstructed by neighbouring developments. The right to light is essential for the preservation of property values, the protection of occupants' well-being, and the maintenance of a comfortable living environment. The primary windows in my living room and sitting room overlook the car park site directly. If the development is granted planning permission, the reduction in illumination would be more than 40%, as well as the vast windows that overlook me from less than 5 metres away. This is completely unacceptable.

The developers' own consultants' DSO of daylight assessment has established the case. I object on the grounds of reduced daylight to my flat in the Ziggurat Building resulting from the increased height of the new building compared with the current height of the car park.

Overshadowing: This development will render the overshadowing process entirely complete, as we are usually in the shadow.

The developers' own consultants' DSO of daylight assessment has established the case. I object on the grounds of reduced overshadowing to my flat in the Ziggurat Building resulting from the increased height of the new building compared with the current height of the car park.

Acoustic quilting as a noise barrier, Noise and vibration: Approximately ten years ago, the carpark installed metal open mesh over the openings, resulting in a devastating drilling noise that included vibrations, reverberations, and a deafening noise. This persisted for six months. We are currently considering a construction programme that will extend beyond two years. I am of the opinion that sound limits should be established by planners as a condition, and the contractor should be required to demonstrate how construction noise will be minimised. This can be achieved by reducing noise-related works to either the morning or the afternoon, as well as the use of noise control enclosures (e.g., acoustic curtains, cutting stations, noise barrier fences, machinery enclosures, generator enclosures).

Tight urban grain with small distances between buildings some of which are residential:

Regrettably, the developer has disregarded this matter and pursued an extensive space acquisition. In a similar tight urban fabric situation, we have been required to step the building from the first floor on a residential building in Southwark. I am presently working on this project. Therefore, I am astounded that the Southwark planners, as evidenced by the earlier Allford Hall Monaghan Morris (AHMM) project for Metropolis at Dorset Square, and the Westminster planners, have implemented a design that necessitates the developers to step the buildings in order to maintain sufficient lighting for neighbouring properties, rather than merely raising the walls at the site perimeter boundary walls.

Finally I would like to add:

Overbearing impact: refers to the adverse impact that a proposed development may have on the properties in the vicinity, including their size, scope, and proximity. It has the potential to influence the visual appeal, amenity, and privacy of the region. The quality of life for neighbouring properties can be significantly impacted by overbearing developments, which can produce a sense of being overlooked or overshadowed. I am of the opinion that Camden Council should request that the developers withdraw their application due to the numerous objections from the neighbours on all sides (North, South, and West). This request would be upheld on the basis of excessive. I object on the grounds of overbearing impact on my flat in the Ziggurat Building resulting from the increased height of the new building compared with the current height of the car park.

In conclusion, the developers have adhered to a conventional consultation method, which included a meeting and the submission of architectural plans. This process resulted in a considerable amount of work on our part, which was subsequently overlooked by them. This disregard for our efforts partially unveils their underlying objective to maximize their spatial acquisition. Given these circumstances, I am inclined to dismiss their proposals and urge the Camden Council to reject their application. The primary reason for this rejection is the overbearing impact of their development, especially on the residents to the north, due to the narrow span of less than five metres across Saffron Street. Our current living conditions are already in close quarters, and these proposals threaten to intensify an already strained situation, pushing us towards an unsustainable future.

I would like to emphasize the profound influence of the adjacent proposals. Their impact is not just substantial, but indeed, it dominates the overall planning landscape tight urban grain with small distances between buildings and most of which are residential . This dominance necessitates careful consideration and strategic response to ensure balanced and sustainable development.

Finally, Planning Permission should not be granted for a development which would reduce outlook, sunlight, daylight, and increase overshadowing in this tight urban grain with small distances between buildings some of which are residential building and only less than five meters away.

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