

23rd January 2014

Regeneration and Planning Development Management  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1 8ND



Dear Conor,

**OBJECTION TO PLANNING APPLICATION 2013/7646/P**

**REDEVELOPMENT OF 79 CAMDEN ROAD AND 86-100 ST PANCRAS WAY, NW1 9EU**

I am the Deputy Managing Director of Optomen Television Limited. I am writing to you on behalf of Optomen Television and the landlord Patricia Llewellyn who is Managing Director of Optomen Television. Our business, at 102 St Pancras Way, includes TV production facilities - edit suites, meeting rooms and office areas and is located directly adjacent to the proposed development.

We wish to register our serious concerns in relation to the above planning application. Our objection comes primarily from the incredibly close proximity of new flats to our south facing windows and the consequent loss of light creating not only the oppressive feeling of having a much taller building metres from our windows but also the complete lack of privacy not only for us but also, it should be noted for future residents of the new scheme. It appears to be a far denser plan than any other new development that I have seen in the area.

Barratts have spoken to us and others prior to the application, and there have been public meetings. I am aware that many people, residents and businesses have commented about the sheer scale of the development being too high for the area and the consequent impact on loss of light and outlook for many surrounding buildings.

The application documents refer to these objections and they say that amendments have been made to take account of light into their own proposed flats on the northern boundary with us. However, now I have seen the drawings I am shocked to see the scale of what is proposed directly facing our windows along our southern flank versus what Barratts had been talking to us about. This is apparent not only in comparing a number of the existing and proposed elevations and sections, but the 3D illustrations in the appendices to the GIA external Daylight and Sunlight report graphically show how the proposal will dwarf our building and all of our windows on that side (attached).

### **Loss of Light**

We have windows along the length of our building at first and second floor levels. These windows look out across the top of the existing building next door which rises up, on the boundary itself with no set-back, for the equivalent of two storeys.

We have expected and accepted for a while that there will be some form of redevelopment of the site, and acknowledge how important it is to provide additional housing in the area, but we ask that the impact that this particular scheme will have on our business be taken into account when looking at the scale of it.

It is completely inequitable that the new building should not adhere to the same angle from the boundary as our building. So acute will be the angle to the top of the building that all visible sky will be lost to our windows unless we stand right up against the pane.

We have taken some photographs from some windows and attached these and some extracts from the architects' drawings to illustrate our concern.

There is not even a passing reference to our building that we can see in the GIA external Daylight and Sunlight report, and hence no comparison between the 'before' and 'after' impact on our offices, so I am keen to bring it to your attention.

In any event, the scheme is not founded on acceptable principles when, according to one of GIA's reports, "only" 72 windows fail to comply with internal lighting criteria. I am no expert but that does sound like a high number.

### **Oppressive Enclosure**

Beside the loss of daylight and sunlight into a substantial number of our windows, there is the overbearing nature of having a taller building only 5 metres away from the only view out for a number of people to be considered. We find, given the aggressive scale of Barratts scheme, that we have no choice but to raise an objection as we believe there could be something more moderate and workable that would be preferable to us and the local community. As we say, we are not against the development in its entirety but it encroaches so much on our building, as you can see quite vividly from the drawings attached that we urge you to negotiate an improvement with Barratts to serve both us and the future residents. Perhaps, a solution might be a two storey reduction in height and/or pushing the building further away from the boundary.

There will be some balconies facing directly into our windows and the prospect of people being out on these in full view could be both disruptive for our business and uncomfortable for the residents. Also with the best will in the world when space is limited in flats, balconies such as these can become storage spaces for bikes and airers etc. and other larger items of rarely used equipment which may serve to exacerbate the claustrophobic effect.

### **Lack of Privacy**

The above issues of proximity also lead to concerns over privacy. It should be noted that as stated above where the flats are positioned we may be able to see what the residents are watching on their televisions or having for their lunch as we sit at our desks and vice versa. With them being 5 metres away nothing will be left to the imagination!

In the course of our business we have some high profile guests who we would want to meet in our offices and edit suites. They would expect and we should be in a position to provide them with privacy without having to draw a blind obscuring what natural light we have left. Also sometimes for legal reasons we are forced to blur or obscure the content / identities of people that we have on screen which we will do before a programme airs to the public at large but not during the edit process and the position and proximity of the flats strange though it may seem, I believe may raise some security and Data Protection issues for us.

Besides there being some issues of commercial sensitivity, most people would expect to enjoy some degree of privacy when they are within private premises regardless of whether they are commercial or residential. We are expressing our own concerns, but your Planning Department as well as Barratts concern would also be for the future affordable housing residents who will be as impacted as we are by this arrangement, if not more so.

### **Waste and Recycling**

With reference to the Waste & Recycling Strategy, it is our understanding that a bin storage area will be adjacent to our building (ground floor). The bin storage area will house waste for 46 units to include mixed dry recyclables, organic food waste and residual waste. We would stress the need for the bin storage area to be maintained regularly for hygiene/health and safety purposes and adequate ventilation installed with pest control procedures put in place as a matter of priority. In addition, the bins from block F (32 units) will be moved to a holding area near Block B on bin collection day.

There is no mention of the holding area being sheltered/contained which is a concern to us and we seek reassurance on this, as having bins left in the open for what might be long periods of time on collection days, particularly in summer months would be very unpleasant, and would attract vermin.

### **Impact to our business during construction**

Our TV production work has very exacting requirements in respect of noise and vibration ingress. We have made a significant investment to ensure our TV production areas meet with the requirements of our production projects and clients, with regard to typical acoustic events that would otherwise impact upon our business.

Our concerns relate to the construction activities associated with the proposals, particularly piling. Without the proper controls on construction related noise and vibration levels, our business may be severely affected and may be forced to cease operating during the construction activities which would be detrimental to our business.

In respect of acceptable levels, it is considered that within a production area, a noise limit (direct or re-radiated) of NR20 (approximately equivalent to 25 dB LAeq, 5min) and the vibration limit of 0.2 mm/s Peak Particle Velocity would be appropriate.

In considering the planning application, we request that we are involved in discussions regarding the noise and vibration criteria you will set for the proposed construction activities and that you will require the Developers to submit a detailed noise and vibration assessment, considering the following issues:

- Setting of appropriate noise (direct or re-radiated) and vibration limits within our TV production areas
- Prediction of noise/vibration levels, within our TV production areas
- Information on the practicable steps the contractor will take to reduce noise/vibration at our location
- The precise methodology the contractor proposes to employ to meet with the above criteria
- A programme of works, identifying any construction activities and/or periods that have potential produce noise/vibration levels exceeding the above criteria
- An estimate of the period or periods for which any activity is likely to cause the specified noise/vibration levels to be exceeded and an estimate of the total duration of the activity
- A regime of noise/vibration monitoring within our edit suites to ensure compliance with the limits and/or no increase in existing ambient noise/vibration levels.

### **Construction Management**

In addition to the above there will presumably be a procession of trucks taking excavation spoil away and delivering incessant loads of building materials and large plant. Site offices, mess facilities, toilet blocks, smoking areas and bike and vehicle parking will all need to be accommodated on the site.

When some reduced form of development is agreed, we would request that they set out their plans for managing all of these issues throughout the contract so as to cause as little impact as possible to neighbours, their visitors, and pavement/road users. We are reassured that you impose such a requirement as a condition on planning permissions, as that should certainly be the case here when the time comes.

### **Conclusion**

We feel that the current proposal of a very much taller building than we anticipated so close to long stretches of our windows should be rejected requiring the developer to scale down the height by two floors and or increase the distance from the boundary in a more equitable arrangement.

The scheme will lead to a drastic loss of our daylight and sunlight, and we ask that you seek modification to the scheme to address that.

With the building being two to three storeys taller than ours, and only 5 metres away in places the sense of oppression will be substantial. Business occupiers as well as future residents need to be safeguarded from over-ambitious attempts to cram too much onto a site.

It does seem extraordinary that in this day and age that such close proximity could be sanctioned on new purpose built accommodation. To achieve any privacy from residents 5 metres away we will have to consider even further light reduction from having to draw our blinds. We believe the circumstances for future affordable housing residents from their north-facing windows will be equally as bleak.

We contribute to the local economy of Camden, helping make Camden a recognisable and attractive place for the creative arts to flourish. We work with Havistock School providing their students with work placement opportunities annually and are currently looking at other schemes to put funds and resources back into the local community. We believe that it is important to support good employers and good working conditions in the borough. A development like this, regrettably will put our business under threat and certainly make the premises less attractive to us and to any future prospective occupiers. This in turn we believe will be detrimental to the local community.



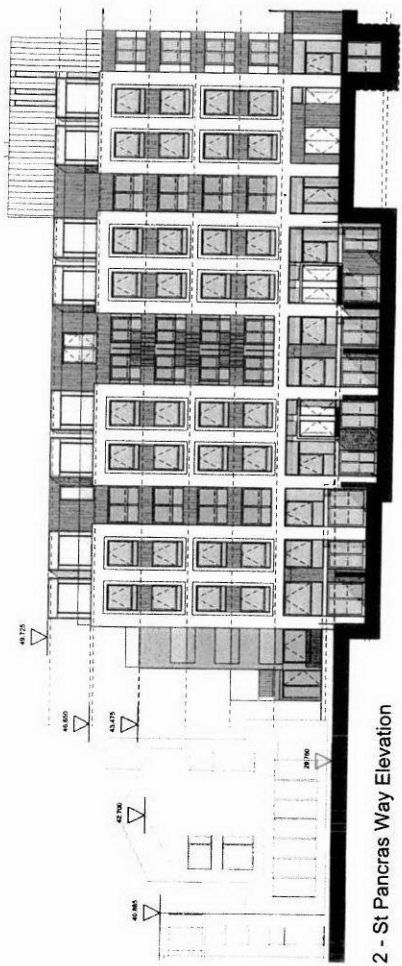
# APPENDIX



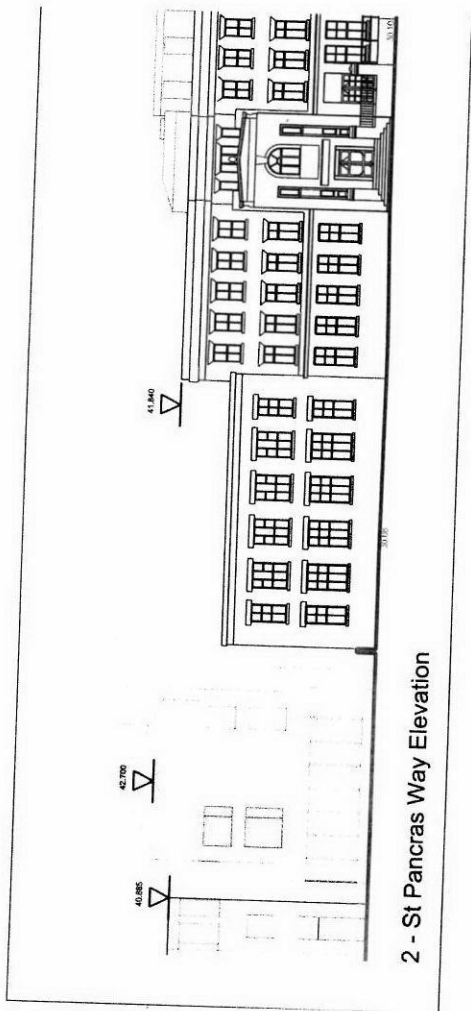




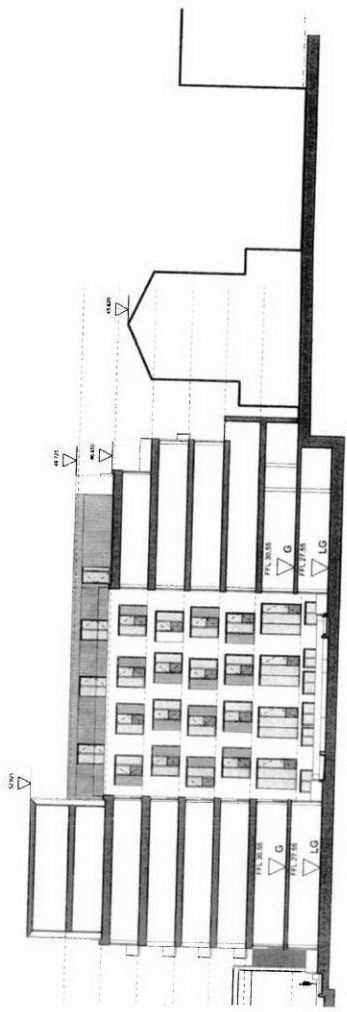




2 - St Pancras Way Elevation



2 - St Pancras Way Elevation



86-100 ST PANCRAS WAY



First floor (E); close window (5M); sky to be lost



First floor (W); close window (5M); sky to be lost



2<sup>nd</sup> floor office. Standing. Plus 4 floors. All sky to be lost.



2<sup>nd</sup> floor office. View from desk height. All sky to be lost



2<sup>nd</sup> floor office; at window. 4 floors to be added. Sky lost