

Mr Richard McEllistrum
Camden Planning Department
London Borough of Camden
Camden Town Hall Extension
Argyle Street
London WC1H 8NJ

31 May 2013

Dear Mr McEllistrum

Objection Letter on Behalf of Sandwich Street Residents' Association to Planning Application 2013/1598/P

This is a letter from the Sandwich Street Residents Association objecting to the planning application for the redevelopment of Commonwealth, Canterbury and Hughes Parry Halls, Cartwright Gardens. The Sandwich Street Residents Association represents the residents of Sandwich House, Sinclair House and Thanet House which comprises a local community of residents of the 180 flats that will be immediately affected by the proposed development. Many residents are long standing, with several living there for more than 20 years and a few for more than 40 years. Members of the Association are used to living alongside the current student community but consider that the proposed redevelopment is excessive and will create many problems. The Association does not object to a sensible redevelopment that respects their amenity but seeks fundamental changes to the design and layout of the submitted scheme.

As a preliminary point, the Statement of Community Involvement and the Planning Statement (para. 6.20) are misleading because they give the impression that a consultation engagement meeting has taken place with the Association. No such meeting has taken place but it is understood that a meeting was held with directors of the company owning the freehold of the residential mansion blocks. We are grateful that the board has written on behalf of the management and freeholders of the block.

The Association objects to the proposed redevelopment because of its excessive size and bulk, the adverse impact it will have on daylight and sunlight enjoyed by residents in Sandwich Street, the adverse impact of nine unmanned entrances in Sandwich Street on noise and anti-social behaviour, the adverse impact of large numbers of communal spaces directly on Sandwich Street (currently there are none), the loss of visual privacy and overlooking, the adverse impact of servicing and refuse collection vehicles on the quiet enjoyment of amenity of Sandwich Street residents and the potential adverse impact of other uses of the accommodation out of term such as conferences.

In short, we seek a smaller, less bulky building, which respects existing daylight and sunlight to residents and the quietness of the street, and is serviced and accessed entirely from Cartwright Gardens. We contend that the increase in accommodation for an additional 187 students does not warrant the massive increase in scale of the proposed development when compared with what is on site now.

The proposed redevelopment is contrary to:

- London Plan policy 2.12 which seeks to protect and enhance predominantly residential neighbourhoods within the Central Activities Zone.
- Camden Core Strategy policy CS5 which seeks to protect the amenity of Camden's residents by amongst other things, ensuring that the impact of developments on occupiers and neighbours is fully considered.
- Policy CS6 which supports student housing development provided that it does not prejudice the quality of residential amenity and the character of the surrounding area.
- Policy CS9 which seeks to support residential communities within Central London by protecting amenity.
- Policy CS14 which seeks to promote high quality places with the highest standard of design that respects local context.
- Development Policy DP26 which seeks to manage the impact of development on occupiers and neighbours, taking into consideration amongst other things, visual privacy and overlooking; overshadowing and outlook; sunlight, daylight and artificial light levels; and noise and vibration levels.
- DP 24 which seeks to secure high quality design.
- DP 20 which seeks to minimise disruption to local communities through the effective management of deliveries.
- Camden Planning Guidance CPG 7.4 which seeks to ensure that there should be a minimum distance of 18m between the windows of habitable rooms of different units that face each other.

Bulk and massing. The proposed development introduces two large five and six storey plus basement blocks of 'town houses' in two terraces along Sandwich Street as well as the back elevation of the main halls building which rises to 7 storeys above ground plus a basement. The elevation of the main halls building is 2 metres higher than the current building. The proposed development infills two open areas which we believe were specifically left open in the existing development to protect daylight and sunlight to properties on the opposite side of Sandwich Street. In design terms this results in a combined mass, scale, footprint, height and bulk that introduces a building that will be monolithic, incongruous and overly dominant to the site and surroundings, causing material harm to neighbouring amenity.

The developers claim that "*The underlying strategy for Sandwich Street has been to re-establish the quality it would have had at the turn of the 20th Century*" (Design & Access Statement 3&4 p31). However, the houses that occupied the west side of Sandwich Street at the turn of the 20th century were small Georgian houses similar to those in Thanet Street which consist of a basement and two storeys (some of these house were still in place until the 1970's). The street was not a tunnel with tall houses either side.

"The wider context features a series of taller urban buildings that have developed in response to the presence of the Euston Road, Kings Cross and St Pancras. The prime connective route running past the site north towards Euston Road suggests it would

be appropriate to take precedent from spaces such as Tavistock & Russell squares".(Design & Access Statement 3&4 p12)

This indicates that the developers see the site existing on a main thoroughfare rather than a minor route in a residential area. We are concerned that it is the beginning of 'development creep' from the Euston Road into residential Bloomsbury. Russell Square is more than 4 times and Tavistock Square almost twice the size of Cartwright Gardens.

The Bloomsbury Conservation Area Character Appraisal and Management Plan says of the current halls: *"These buildings are out of scale with original development surrounding Cartwright Gardens, but each is architecturally symbolic of its era, and is set back from the pavement behind railings, respecting traditional boundary treatments in the street".* (Planning Statement p51).

The proposed building is even larger and more out of scale.

Factors contributing to the size of the building.

There are effectively still three halls. The tower block, which has its own reception area and warden, is separated by a new delivery road from the main hall. The hotel-like structure facing Cartwright Gardens and backing onto Sandwich Street in the middle, has its own reception area and warden. The 'town houses' on Sandwich Street have no warden.

Separate reception areas increase the size of the building, as does the new delivery road. The 'town houses' each contain one and a half floors of communal space for 7 students. In the centre of the hotel-like building, more than one third of the ground floor is occupied by communal lounges and the two large spaces (flexible study space and flexible university space). In total, 12.43% of the halls is Amenity Leisure Space or Ancillary University of London flexible space.

Daylight and sunlight. Residents of Sandwich Street enjoy an amount of daylight and sunlight because of the open nature of the existing frontage on the opposite side of the road. As there are a number of basement flats with already restricted daylight and sunlight this is particularly important in terms of adverse impact on amenity. The submitted Daylight and Sunlight Assessment admits various breaches to standards in all blocks but seeks to downplay the impact as minor and to be expected in an urban situation. In particular it accepts that there are breaches to 21 rooms in Sandwich House, some suffering a 40-58% reduction in natural sunlight, which is acknowledged to be "serious" if in a suburban situation. The assessment does not take into account that the block is made up of individual dwellings and a large number of households will suffer light loss. We contend that there should be no loss of daylight and sunlight to residents of Sandwich Street and this can only be achieved by a reduction in the height and bulk of the proposed development.

We append a letter from Anstey Horne, daylight and sunlight experts, who have reviewed the submitted assessment by GIA. They disagree with GIA that loss of light impacts are moderate or minor and conclude that there will be a significant change to the daylight conditions to a large number of flats and consequent loss of amenity.

Overlooking. The developers appear to have totally ignored the problem of overlooking and CPG 7.4 which seeks a minimum distance of 18m between windows

of habitable rooms of different units facing each other. Fewer than half the flats in Sandwich House are currently overlooked as at the north end the residence is 38m from the flats in Sandwich Street. The lack of information as to dimensions makes it difficult, if not impossible, to do accurate measurements, but on the information provided, the proposed building appears to be 14m from all the residences opposite in Sandwich Street. This proximity of the proposed building to Sandwich House and the increased height of the central block and town houses mean that virtually all the flats in Sandwich House will suffer from severe overlooking.

Deliveries and servicing. *"Through the design evolution, the number of town-houses to the north of Sandwich Street have been reduced to respond to the concerns of residents at Sandwich House"* (Planning Statement p37). This misinterprets our concerns. We have expressed our view to the university and the developers that the 'town houses' will cause major problems. It is stretching credibility to suggest that it will benefit us to remove one of them in order to create a delivery road immediately opposite Sandwich House.

The new delivery road will send all traffic to the halls down Sandwich Street, where it will idle waiting for a gate to open. At present there are six delivery points, three in Cartwright Gardens, so the nuisance is not concentrated at one point in Sandwich Street.

The Delivery and Service Management Plan (DSM) states that service vehicles will be directed to the site outside congestion zone hours, that is before 7am and after 6 pm, introducing heavy lorries to a quiet residential street at unsocial hours disturbing residents' morning sleep and evening peace.

The DSM accepts that there will be 51 general deliveries per week including food deliveries and 6 waste collections per week. In addition there are likely to be post, maintenance, and many other ancillary service deliveries which are not included in these estimates. We believe that this service vehicle traffic is excessive in terms of impact on the residential amenity of Sandwich Street. We object to the proposed service facility which has a main entrance from Sandwich Street immediately opposite Sandwich House and egress to Cartwright Gardens. We believe that all servicing should be from Cartwright Gardens which is an entirely non-residential street in the vicinity of the proposed development and therefore will not impact on residential amenity.

Air Quality. The Air Quality Assessment states *"The Proposed Development will not generate additional traffic flows on local roads and therefore the impact of road traffic emissions from the Proposed Development is negligible"*. (8.2). There will be a heavy increase in delivery traffic at one end of Sandwich Street, and when conferences take place a heavy increase in coach traffic. At present there is a flow of air through the street because of the low level of the building beside the car park opposite Sandwich House. If the street becomes enclosed there will be little air flow because there are tall buildings at either end of Sandwich Street blocking air movement.

Noise, disturbance and bad neighbourliness. We are particularly concerned about the proposed 'town houses' in Sandwich Street which are to have direct access to the street during daytime hours. We believe that all access should be from Cartwright Gardens. We have noted the comments in the Student Accommodation Management Plan that a community liaison group is proposed to address issues of concern and a 24 hour helpline installed. We note that the doors to the town houses are only to be open between 7am and 7 pm and that there will be CCTV cameras monitoring activity. All of this suggests that there is a significant potential for noise and disturbance to local people.

We are deeply concerned at the suggestion that local residents will be expected to act as a student management tool: residents should not be expected to police disturbance. We believe that these issues should be dealt with by good initial design rather than being mitigated by a Student Management Plan which can be hard to enforce in a building of this size, made up of several separate components.

The developers state they are "*Introducing individual entrances to the townhouses during daylight hours to activate Sandwich Street and encourage interaction between the students and Sandwich Street residents*" (PS p63). Houses occupied by resident adults increase security by activating the street; houses occupied by transient young adults do not.

Student noise is experienced by local residents under the current arrangements but it is mainly bearable because of the distance created by the car park. The only communal space directly on Sandwich Street at present is a small library in Canterbury Hall.

New sources of noise on Sandwich Street from the new development.

1. Nine doors onto the street at ground level; students and local youths will gather here
2. Nine doors into the light well, students will gather here to smoke
3. 18 communal spaces, on the ground floor and in the basement, of the town houses fronting onto Sandwich Street with windows that open onto the street.
4. 10 common rooms in the central building which will have two common rooms (Kitchen/Lounges) on each of the 1st to 5th floors facing Sandwich Street. On the Cartwright Gardens side of this building the common rooms all face into the inner courtyards rather than onto the street.
5. The large communal room running the length of the central building in Sandwich Street, one third the length of Sandwich Street
6. 14 kitchen/Lounges one on each of the 14 floors of the tower block with windows facing Sandwich Street.
7. The 'pocket' garden at the corner of Sandwich and Hastings Street will attract the local youths
8. The nine 'green' flat roofs of the town house which have stairs up to them.
9. The plant on the central roof.
10. The gated delivery road, where heavy lorries will sit with their engines running.

These communal areas face directly on the street creating the inevitable prospect of noise, disturbance and loud music to the detriment of existing residential amenity. It will not be possible to monitor activities in the 'town houses' from the main hall building, so students who are intent on partying will inevitably gravitate towards these areas.

The large room in the central block is described as 'a large flexible study space with moveable partitions and furniture provides breakout space and an opportunity for meetings and assemblies.' Page 32(D& A 5&6). The student management plan states that conference facilities (presumably the large ground floor room) will be closed in the evening. If it is not closed at night it will inevitably be used by the students for parties. So at night this very large space will either be dead, or very noisy. At present this area is student bedroom/studies which are in constant use and provide better surveillance of the street than the large room would.

We are also concerned about the potential from noise nuisance from the proposed courtyards where there seems to be provision for some form of performance space (this was mentioned at the Camden Development Management Forum). This has the potential to cause nuisance to both local residents and students who may need to study in other parts of the development.

We believe that the submitted design and layout fails to address the problem of how to accommodate very large numbers of transient young people in residential areas with the minimum of friction with the residential community. Local people already suffer the problem of drug dealing in Sandwich Street and believe that the unmanned entrances to the town houses will become a magnet for drug dealers.

Residents are aware of the problems caused by the two groups of local youths that meet in Sandwich Street and which shout at students and occasionally fight them. The proposed communal spaces on Sandwich Street will put the students and local youths in close proximity. More than 10 years ago a railing was erected in front of the car park on Sandwich Street at the Association's request so that youths could not congregate there. The problem is currently contained as a result of strenuous effort by residents, councillors and the police. We believe that the proposed development does not address these issues which are likely to be exacerbated by the submitted design and layout, by the inclusion of doors and communal room windows, even at ground level, directly on the street.

There are two other areas where students may congregate on Sandwich Street; the flat green roofs of the town houses and the pocket garden at the corner of Hastings and Sandwich Street. Although roofs are out of bounds to students, residents see them there frequently. The green roofs of the town house will be clearly visible from most of the hall and will be an inviting place to sit. In our experience, if the space is potentially accessible students will find a way onto it. This is another potential problem that should be designed out, rather than relying on enforcement.

There is a large amount of plant proposed immediately opposite Sandwich House on the central roof. Residents have had many problems with noise from plant that persisted over several years. The plant should be on the Cartwright Gardens side of the building opposite the buffer zone of the park.

Security. There will be no security staff based on Sandwich Street to monitor activity. When we have raised these issues the response has been that behaviour will be strictly controlled and enforced by Section 106 agreement. We do not believe that this will succeed. The design of the current buildings with no communal rooms or entrances on the residential street has helped avoid friction between students and the local community.

In the proposed buildings there are two wardens: one based in the separate Hughes Parry tower block, responsible for 246 students; and only one warden in the hotel-like block, responsible for 954 students, 172 of them in 'town houses'. This is one fewer warden than at present. There will be two security staff at night, half the current level. Although the wardens will be assisted in keeping order by post-graduate students, we are extremely concerned that this level of staffing is far too low.

Developers Acoustic Report. This report is solely concerned with the issue of sound entering the halls. No consideration has been given to noise from within the halls other than that it will be handled by a management plan. The best quality double-glazing is on the corner of Leigh Street, to protect the students from noise from the pub.

Other potential uses. We are concerned that there is a large amount of ancillary space and flexible space within the proposed building. The Design and Access Statement indicates that the Sandwich Street block will accommodate 400 sq m of flexible study area and 210 sq m of ancillary university space. The University have stated that they would use this space for running conferences outside term time. We contend that conference use is unacceptable because of the adverse impact on residential amenity caused by large numbers of people attracted to the venue together with traffic including coaches. There is already a serious problem in the area with illegal coach parking.

Reliance on enforcement by Camden. This development relies heavily on the use of a Section 106 legal agreement; it occurs frequently in references to the Student Management Plan. Camden will have to police the increase in noise, antisocial behaviour and traffic that this development will bring. The enforcement is necessitated by the design of a building that is not appropriate for its purpose. The building appears to us to have been designed with conferences in mind and not with either students or residents.

The reliance on Section 106 is of particular concern because this is funded by a private company. The example of Athlone House demonstrated how ineffectual restrictions at the planning stage can be if a company changes hands. The agreement between the university and UPP is confidential and there is no guarantee that in 5 years time the building will be in the same hands.

Without Prejudice. If despite our objections the Committee decides to grant permission for this or a revised scheme that respects residential amenities then we request that a planning condition is imposed that prohibits conference use in perpetuity. Additionally, there should be a condition that precludes students from accessing the proposed green roofs of the 'town houses'. We would wish to be consulted on the Section 106 agreement.

Peter Weatherhead Planning

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Conclusion. In summary, the Sandwich Street Residents Association objects to this proposed development because of its potentially significant impact on local residential amenity and the serious loss of quality of enjoyment of living in this residential community. We have made a series of suggestions as to how the development might be redesigned to pay more respect to residential amenity and the local community. As proposed it is an overdevelopment of the site with substantial adverse impact on the living conditions of the local community and is in conflict with a number of local planning policies which we have set out above. We believe that planning permission should be refused.

Yours sincerely

