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Development, Enterprise and Environment

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Our ref: PDU/3027/SL
Your ref: 2013/1598/P
Date: 29 May 2013

Richard McEllistrum
Development Control, Planning Services
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 3ND



Dear Mr. McEllistrum ,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
University of London, WC1H 9FF
Local Planning Authority Reference: 2013/1598/P

I refer to the copy of the above planning application, which was received from you on 19 April 2013. On 29 May 2013 the Mayor considered a report on this proposal, reference PDU/3027/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in the above-mentioned report; but that the possible remedies set out in paragraph 59 of this report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Beth Havelock (BethHavelock@tfl.gov.uk).

Yours sincerely,



Senior Manager– Planning Decisions

- cc Andrew Dismore, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL

29 May 2013

**University of London Halls, Cartwright Gardens,
Bloomsbury**

in the London Borough of Camden

planning application no. 2013/1598/P

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Partial refurbishment and partial redevelopment of the site to provide 1200 student accommodation rooms, an uplift of 187 student rooms and additional ancillary uses. Public realm improvements to Cartwright Gardens and surrounding area.

The applicant

The applicant is **University of London** and the architect is **TP Bennett**.

Strategic issues

The principle of re-providing better quality and a higher density of **student accommodation** on this site does not raise any strategic planning concerns. The loss of a non-designated **heritage** asset does raise strategic concern, however, on balance, this is considered acceptable.

Further information is required regarding **urban design, inclusive design, transport, climate change** and **sustainable drainage**.

Recommendation

That Camden Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 59 of this report; but that the possible remedies set out in paragraph of this report could address these deficiencies.

Context

1 On 19 April 2013 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B of the Schedule to the Order 2008:

1B: Development which comprises or includes the erection of building(s): (b) in Central London and with a total floorspace of more than 20,000 square metres.

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The rectangular site is located in Bloomsbury and is within the Bloomsbury Conservation Area. The site is bound by Cartwright Gardens, a Georgian residential crescent with a small park to the west; Leigh Street to the south, which is characterised by a mix of residential and small retail units at ground level; and Sandwich Street and Hastings Street, predominantly residential streets, to the east and north respectively.

6 The site is currently entirely occupied by University of London Student accommodation, arranged in three distinct elements dating from different periods and of differing architectural styles. This includes Hugh Parry House to the north of the site, a 15-storey Tower with a four-storey element fronting onto Cartwright Gardens dating from the 1960/1970s; Canterbury Hall in the centre of the site, comprising two parallel seven storey student blocks dating from the 1930s, which front both Cartwright Garden and Sandwich Street; and Commonwealth Hall, a modernist student accommodation block ranging from five to eight-storeys in height. Collectively the site provides around 980 student bedrooms to students affiliated with University of London institutions.

7 The site is just to the south of Euston Road (A501) part of the TFL road network. A total of 17 bus routes can be accessed from between 100 and 400m from the site. Three underground/mainline railways stations are located within 960m of the site, including Kings Cross St. Pancreas, Russell Square, and Euston. The site is well served by Cycle Hire docking stations, the nearest is located directly outside the existing entrance on Cartwright Gardens. The site has therefore has an excellent public transport accessibility level (PTAL) of 6b, on a scale of 1-6 where 6b is most accessible.

Details of the proposal

8 The applicant is seeking full planning permission to redevelop the existing student halls. It is proposing to demolish Canterbury Hall and Commonwealth Hall and to partially demolish and refurbish Hughes Parry Hall to provide 1,200 students rooms, a net increase of 187 bed-spaces and also additional ancillary uses such as flexible teaching/study space, communal and catering spaces.

9 The proposal will also include public realm improvements, including improvement to Cartwright Gardens.

Case history

10 A pre-application meeting was held on 21 September 2012.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Student Housing *London Plan;*
- Historic Environment *London Plan;*
- Tall buildings/views *London Plan, London View Management Framework SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Transport *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG Parking London Plan; the Mayor's Transport Strategy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Camden Core Strategy and the 2011 London Plan.

13 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework and the draft Revised Early Minor Alteration to the London Plan.

Principle of development

14 The principle of re-providing better quality and a higher density of student accommodation on this site does not raise any strategic planning concerns and is supported.

15 The site is leased by University of London, an umbrella term for 18 self governing 'colleges' and ten research institutes, including a large number of the London based universities, such as UCL, Goldsmiths, Queen Mary's University, LSE and Birkbeck. Seven of the University's 18 colleges are based in Camden.

16 The applicant states that students from any of its colleges would be able to apply for the proposed accommodation and there is an urgent need to increase the number of bedrooms it can offer. Approximately 97,600 students are enrolled within the University of London federation but the University and colleges currently only provide 16,578 bed-space. It states that whilst private halls and the private-rented sector address are available to students, there is a strong preference, particularly among first year students to live in University run accommodation.

17 The redevelopment of this site is part of a wider programme in which the University is seeking to refurbish and expand its eight existing intercollegiate halls.

18 In line with paragraph 3.53 of the London Plan, the student accommodation should be secured as such within the Section 106 or by planning condition.

Heritage

19 Canterbury Hall, whilst not listed, is identified as a positive contributor to the Bloomsbury Conservation Area. In line with NPPF guidance, the issue is the level of harm the loss of the building will cause to the Conservation Area and whether the proposal outweighs any harm.

20 Canterbury Hall dates from the late 1930s and was originally built as a woman's hostel, funded by the Church of England. The Bloomsbury Conservation Area Appraisal and Management Plan describes the building as having "a strong Art Deco-inspired symmetrical seven-storey façade

in a ... brown brick with transomed steel encasement windows, and a stone rusticated base and central entrance feature."

21 The applicant's Heritage Assessment is critical of the building, describing the facades as "in a brown stock brick with rather mean and crude art deco style detail" and stating "there is a strange gothic detail to the main entrance which appears at odds with the overall proportion and architectural style of the building." Officers do not agree with this pejorative assessment of the building.

22 The applicant has also produced a Feasibility Report which assesses the feasibility and implication of retaining Canterbury Hall in its entirety or in part. The report states that the building is showing signs of deterioration and decay such as damp and it would very difficult to refurbish the existing building to meet modern standards. Equally, due to its relatively small floor to ceiling heights, it would be difficult to either incorporate the building into a larger development or retain the façade without compromising the quality of the internal accommodation. It states the block does not meet modern needs or expectation for student accommodation.

23 English Heritage has provided a letter setting out its view of the proposal and the impact on the Conservation Area. It states that the existing university buildings:

"as a group, detract from the surviving 19th Century formal layout and associated built form that is integral to the character of this part of the conservation area. The replacement of these buildings is therefore an opportunity to enhance the conservation area. The proposed replacement building... is of high quality, and responds appropriately to its context by reinstating some of the original formality of the urban layout around Cartwright Garden... Whilst the loss of the 1930s Canterbury Hall is regrettable, the benefits provided by a comprehensive approach to new development have to be balance against the harm caused by that loss, which in our view is less than substantial."

24 Officers broadly agree with English Heritage's assessment. Whilst Canterbury Hall is a positive contributor to the Conservation Area and its loss is will cause harm to the conservation area, this harm is less than substantial and is, on balance, outweighed by the replacement and refurbishment of the other, low quality buildings on the site, the provision of additional student rooms, and the high quality replacement building.

Urban design

25 At the pre-application stage it was set out that whilst there was concern about the loss of the historical Cantenbury Hall, the scheme did not present any significant strategic design concerns.

26 The current scheme also does not raise significant concerns. The proposed layout interfaces with all surrounding street well providing good levels of overlooking on to the public realm without compromising the privacy of the units. It successfully accommodates all servicing and back of house uses away from the street frontage which is also welcomed. The layout of the upper floors do not present any significant concern and achieve a reasonable internal quality of accommodation.

27 The seven storey shoulder height with the additional two storey mansard roof facing Cartwright Gardens is in keeping with the overall contextual height of the area and reflects the current street hierarchy, which is welcomed. The lower seven storey buildings facing Sandwich Street responds to the streets dimensions and is also in keeping with the overall contextual height. Whilst the refurbished 15 storey tower is an anomaly with regards to height, the proposal for its refurbishment is welcomed as it is not detrimental to the surrounding area.

28 The elevations of the scheme each respond to their respective street and are heavily derived from the historical context of surrounding buildings. The choice of brick as the main material and the simple gridded elevations create a subdued but elegant elevation which is welcomed. The differences between the elevations on each street contribute towards strengthening their individual character which is also welcomed.

29 The proposed demolition of Canterbury Hall is disappointing. It is part of the areas heritage and provides historical continuity which will be lost with its demolition. However, given the quality of the replacement building and given that the impact of a more unified block on this side of the Gardens would have benefits for the Conservation Area, as set out by English Heritage, the development is, on balance, considered to be acceptable.

30 The proposed site falls with Blackheath Point London Panorama 6A as identified in the London View Management Framework. Whilst it is unlikely to impact on the view, the applicant is required to demonstrate this by providing a visual assessment from the view point. Further information is required regarding the impact on the Blackheath Point panorama.

Inclusive design

31 At the pre-application stage, the applicant was advised that 10% of the units proposed should be designed for wheelchair users or larger enough to be 'easily adaptable' into wheelchair accessible units. The applicant is proposing 60 (5%) wheelchair accessible rooms and states it will provide a further 5% at its own expense if required by students. It has provided a plan of how additional rooms would be provided. It would essentially require knocking two standards into one by removing the non-structural partition wall and replacing the bathroom and relocating the doors. This does not meet the definition of 'easily adaptable' as defined by the Mayor's Housing SPG (November 2012) i.e. not requiring structural alterations (such as removing walls to enlarge rooms) to make it suitable for wheelchair users.

32 The halls are located in an extremely accessible location and they are potentially available to 97,600 students, as such the applicant should provide the full 10% wheelchair accessible rooms from the outset. Whilst it is not essential that all the rooms are fitted out, they should be sufficiently sized to accommodate wheelchair users without structural changes.

33 It is appreciated that this is a car free development; however some disabled persons parking should be provided for disabled students on street and the applicant should provide details regarding the location, amount and designation of this parking.

34 The applicant is proposing a raised table between the park and entrance of the proposal and also at the junction of Leigh Street and Marchmont Street. The applicant has not provided any details of how it will meet the needs of disabled people, including blind and partially sighted people and is required to do so.

35 The applicant is proposing two platform lifts on the ground floor to serve 35 rooms on the ground floor. Platform lifts are not an inclusive solution and should be avoided in a new buildings (they are more appropriate in historic buildings where access for disabled people cannot be achieved by any other means). Platform lifts can be unreliable and require additional maintenance and repair and it is more appropriate to 'design out' the requirement for a level change than rely on a platform lift. The applicant is required to reconsider the ground floor layout so that it meets the highest levels of accessibility and inclusion in line with London Plan Policy 7.2.

36 The application does not comply with London Plan inclusive design policy. The applicant should increase the number of wheelchair accessible bedrooms, revise the ground floor layout,

provide details of blue badge parking and provide details of how the proposed raised table will be designed to meet the needs of disabled people.

Transport

Parking

37 The car free nature of the proposed development and reduction of 20 car parking spaces is welcomed. The applicant states blue badge parking will be provided on street due to on site space constrains. However, additional information should be submitted on how the Blue Badge car parking spaces will be managed.

38 A total of 600 cycle parking spaces are proposed for the 1,200 beds and this is strongly supported. The applicant is encouraged to provide at least two spaces for visitors, in line with London Plan Policy 6.9. 'Cycling.'

Public Transport

39 The proposals may increase the demand for bus services where there is limited spare capacity. The applicant should provide additional data as to the destination of students occupying this accommodation. The trip generation and mode split assessment should be adjusted according to these figures. Depending on the outcome a contribution may be sought to mitigate the impact of additional trips in line with London Plan policy 6.3 'Assessing Effects of Development on Transport Capacity'.

Taxi & Private Hire Vehicles

40 A dedicated facility for taxi and private hire vehicles set down/pick up should be provided in a safe environment, close to the entrance/exit and with step free route to the building. It is also expected that taxis would be used by some students for moving in and out of the halls at the end of their tenancy and it is recommended that taxi travel is considered within the Student Management Plan. Unlike taxis, all private hire vehicles must be pre-booked and it is therefore important to ensure that there is a maximum waiting time restriction placed on any drop off bay to discourage illegal touting.

Walking & Cycling

41 As stated above, a 21 Cycle Hire docking station is located directly outside the site on Cartwright Gardens. This facility will have the capacity to deal with any additional demand generated from the development and therefore no additional capacity is sought. The travel plan should nevertheless promote the use of cycle hire as an alternative to short journeys by bus or underground for either students or staff.

42 The submission of a pedestrian (PERS) audit is welcomed and Camden Council should agree, secure and implement all the improvements identified through the section 106 or section 278 agreement.

Travel Planning

43 The submission of a travel plan is welcomed. The content of the plan was reviewed in accordance with the ATTRBuTE assessment tool and regrettably failed due to the lack of mode share and other targets set for the period three and five years after occupancy. Therefore, this matter must be addressed before the plan can be deemed acceptable. However, this can be undertaken at the implementation stage and the travel plan should be secured through section 106 agreement to

ensure conformity with London Plan policy 6.3 'Assessing effects of development on transport capacity'.

44 Whilst the submission of a student management plan is supported, it should be amended to include a comprehensive and detailed booking system, as follows:

- Contingency plans in place should students arrive on site later or earlier than their allotted time due to unforeseen circumstances.
- Information available that details nearby parking facilities for those visitors who require a longer time period than their allocated slot. Comprehensive travel information detailing the access routes to the residence (where possible avoiding Central London), parking and loading provision in the immediate locality inclusive of restrictions, length of stay and penalties and, in addition, information on congested traffic times should be made available. This will ensure that users are discouraged from causing any disruption to the local road network and encourage the use of public transport.
- Temporary signage placed at strategic locations on approaches to the site to reinforce routes and help avoid cases of drivers becoming lost in nearby neighbourhoods.

45 The plan should be subject to annual review and if it is found that the staff provision/implemented procedures are insufficient then additional resources should be provided for subsequent years. The plan should be secured by condition.

46 TfL welcome the draft construction logistics plan and delivery and servicing management plan. The construction logistic plan will need to identify efficient and sustainable measures that will be undertaken during construction of the development including measures which will reduce the conflict between pedestrians and cyclists. Both of these plans should be agreed with Camden Council in consultation with TfL and secured by planning conditions.

Community Infrastructure Levy

47 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1st April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail

48 The Mayor has arranged boroughs into three charging bands. The rate for Camden is £50. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/ukdsi/2011/987/made>

Summary

49 Further information is required to ensure the application complies with London Plan transport policy. The applicant should provide further information is submitted on the trip generation for the bus network and blue badge parking. Suggested improvements should be made to the Travel Plan and Student Management Plan and secured by condition. The level of cycle parking, a construction logistics plan and a delivery and servicing plan for the application should be secured by condition to be in accordance with the London Plan transport policies.

Climate change

50 The applicant has broadly followed the energy hierarchy and is proposing to reduce carbon emissions by 28%, thus exceeding the London Plan requirement. In total, 8% savings will be achieved from energy efficiency measures, 20% savings from a combined heat and power site wide heat network and 2% savings from roof mounted PV.

51 The applicant has identified that the SOAS district heating network and other networks are planned in the area (i.e. Argent, Kings Cross, Euston Road, UCL Gower Street). The applicant has consulted with relevant stakeholders (the energy manager for SOAS, the consultants leading the masterplanning of the energy network in the Bloomsbury area and Harold Garner at Camden) and states that the SOAS network is at early development stage and there are currently no plans for its extension towards the application site. The applicant also states that there is currently no firm proposal for the extension of the Bloomsbury network towards the site. The applicant is proposing a communal heating system to serve the whole development initially served by on site plant. The system will allow connection to the district heat network when this becomes available at a future date. Connection to the network should continue to be prioritised and evidence of correspondence with the network operator should be provided.

52 The applicant is proposing to install a site heat network connecting both buildings and the applicant should confirm which one of the plant rooms shown on the plans (drawing no A10417 D099 rev P1) will be the energy centre. The applicant is also clarify whether consideration has been given to potential shading of PV panels from adjacent buildings / parts of building and plant equipment when quantifying the potential for PV installation.

53 The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan. However, further information is required to ensure the application complies with London Plan Policy. The applicant should provide the request information regarding the nearby district heat network, the plant room and PV.

Sustainable drainage

Surface Water Run-off

54 The Sustainability Statement indicates that a small portion of the roof will be a green roof and this will, amongst other benefits provide for some attenuation of surface water. This alone is considered insufficient to meet the Mayor's minimum standard of a 50% reduction in run-off rates contained within the Sustainable Design and Construction SPG, and therefore it fails to comply with the London Plan sustainable drainage hierarchy contained within Policy 5.13. In particular the gardens should be designed to collect and absorb surface water and indeed could receive a high proportion of the residual surface water flow from the redeveloped Canterbury Hall building.

55 The application does not comply with London Plan Policy 5.13. The applicant should re-examine the drainage aspect of the proposals and include measures to divert or attenuate a higher proportion of the surface water run-off.

Local planning authority's position

56 Camden Council's position is not known.

Legal considerations

57 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

58 There are no financial considerations at this stage.

Conclusion

59 London Plan policies on student accommodation, heritage, urban design, inclusive design, transport, climate change and sustainable drainage are relevant to this application. The application complies with some of these policies but not with others and the suggested changes may remedy the deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of the development:** The principle of re-providing better quality and a higher density of student accommodation on this site does not raise any strategic planning concerns and is supported. In line with paragraph 3.53 of the London Plan, the student accommodation should be secured as such within the Section 106 or by planning condition.
- **Heritage:** Whilst Canterbury Hall is a positive contributor to the Conservation Area and its loss is will cause harm to the conservation area, this harm is less than substantial and is, on balance, outweighed by the replacement and refurbishment of the other, low quality buildings on the site, the provision of additional student rooms, and the high quality replacement building.
- **Urban design:** On balance, the proposal is considered acceptable in design terms. However, further information is required regarding the impact on the Blackheath Point panorama.
- **Inclusive design:** The application does not comply with London Plan inclusive design policy. The applicant should increase the number of wheelchair accessible bedrooms, revise the ground floor layout, provide details of blue badge parking and provide details of how the proposed raised table will be designed to meet the needs of disabled people.
- **Transport:** Further information is required to ensure the application complies with London Plan transport policy. The applicant should provide further information is submitted on the trip generation for the bus network and blue badge parking. Suggested improvements should be made to the Travel Plan and Student Management Plan and secured by condition. The level of cycle parking, a construction logistics plan and a delivery and servicing plan for the application should be secured by condition to be in accordance with the London Plan transport policies.

RECEIVED

30 MAY 2013



Culture & Environment

Comments Form

Name Matthew Anthony

Address Flat 38 Sandwich House, Sandwich Street WC1H 9FF

Email address Melat14@hotmail.com

Telephone number 07796 544 769

Planning application number 2013/1598/P (associated ref. 2013/1787/C)

Planning application address University of London, Garden Halls, WC1H 9FF

I support the application (please state reasons below)

I object to the application (please state reasons below)

Your comments

I live opposite the proposed Garden Halls Development in Sandwich House and have done since 2006. I think the area is well served by a blend of students and longer term residents and it has a special village-like atmosphere in the heart of London.

Although I do feel that the redevelopment could be very good for the area, I believe that the proposed design is far too high and bulky and has not been designed very sympathetically towards the surrounding residential properties. In particular I have real concerns about the impact on the daylight and sunlight that my living room currently enjoys. I have read the 'Daylight, Sunlight and Overshadowing Report' with interest but have to say I don't have complete confidence in its findings. Overall the report seems to be quite biased in favour of the development which is not totally surprising, but there are a number of things I have noticed which, I think, questions the accuracy of the report.

Firstly, there appear to be some obvious factual inaccuracies in the report. On page 10 paragraph 2, it talks about the proposed building, on the existing car park opposite 28-51 Sandwich House, and says:

"...the proposed massing for the car park rising to 15m in height"

This is factually incorrect as the height of the proposed structure in the car park is 38.198m according to Gia drawing 6173-48 (in appendix 2).

What building height are the report's calculations of daylight impact actually based on; the height that is given by the drawings in the appendix or the much lower height that is presented in the main body of the report? This surely would have a big effect on the conclusions the report reaches regarding the daylight impact on 28-51 Sandwich House.

Also, the same paragraph on page 10 states that the separation distance between Sandwich House and the proposed structure would be "just under 15m". According to TP Bennet drawing CO 501

Please continue on extra sheets if you wish

(document filename 'Existing and proposed drawing -3163965') the separation distance between Sandwich House and the proposed structure would be 15.26m. Which of these separation distance values is the accurate figure? And why are the authors of this report and the architectural drawings not presenting a consistent picture? It also raises the question of what else might not be presented accurately in this planning application.

Secondly, the report claims in numerous places that it has made assumptions about the usage of rooms (Appendix 1, page 7 paragraph 2) in the buildings on Sandwich Street. Living rooms and kitchens are given higher priority for daylight by the BRE guidelines, which are referenced repeatedly in this report e.g. page 2, final paragraph; page 24, 2nd paragraph. However, on the table in Appendix 3 of this report (Daylight Analysis – Vertical Sky Component), over 90% of the rooms in Sandwich House have no room assumptions made for them. In fact, the only room assumptions it has stipulated are those that are designated as 'halls'. What room assumptions has it made for all the other rooms, if any? And would it affect the report's conclusions if they had assumed that some/half/most of these rooms facing the new development are living rooms, like mine is?

Thirdly, the report claims numerous windows in Sandwich House will see an actual benefit in Daylight/Sunlight under the proposed structure (page 25 paragraph 2). Presumably this claim is based upon the new structure being slightly shorter than the proposed development. But has the fact that the new structure will be much closer to Sandwich House than the existing structure been taken into consideration? According to Gia drawing 6173-48 (Appendix 2) the proposed building will be 42498mm high compared with an existing height of 42970mm (based on Appendix 2; GIS drawing 6173-20). This equates to a reduction in height between the existing building and proposed building of about 1%. But the proposed structure is over 1 metre closer to SST House than the existing structure, which means it is approximately 7% closer. One would expect that a 1% reduction in height would be scant compensation against a 7% increase in the proximity of the new structure. Even if, as the report claims, there is no negative impact on daylight by the proposal, there would certainly be a negative impact in terms of privacy; with over-looking windows being much closer to Sandwich House than they currently are.

In light of the above I cannot see how anyone can have complete confidence in the accuracy of this report. I also think that it is biased in favour of the development and presents a more favourable picture of the potential impact than is maybe the case. I think that a completely impartial daylight survey should be carried out before any parties can be in a position to make a balanced decision about the proposed development and its impact.

Why can't the designers remove the new conferencing halls from their designs, thus making the proposal shorter and less detrimental to the surrounding properties? The thought of having coach loads of people attending conferences at the new building all Summer is not a particularly welcome prospect.

On a general level, I am also disappointed that the design team do not appear to have taken on board any of the feedback which I and other residents have left at previous consultations. At one public consultation, I believe they also gave the impression that the proposed building was not going to be any closer to Sandwich House than the current building which was misleading for myself and many others.

- **Climate change:** The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan. However, further information is required to ensure the application complies with London Plan Policy. The applicant should provide the request information regarding the nearby district heat network, the plant room and PV.
- **Sustainable drainage:** The application does not comply with London Plan Policy 5.13. The applicant should re-examine the drainage aspect of the proposals and include measures to divert or attenuate a higher proportion of the surface water run-off.

for further information, contact Planning Decisions Unit:

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