



Fergus Freaney
Planning and Development Team
Camden Council
Camden Town Hall Extension
Argyle Street
London WC1H 8EQ

Dear Mr Freaney

**OBJECTION TO PLANNING APPLICATION 2015/1579/P
THE PLACE (CONTEMPORARY DANCE TRUST)**

I confirm that I would like to add my observations, comments and objections to that of David Burnie and Bloomsbury Conservation Area Advisory Committee to the proposed erection of a 2 bedroom flat with roof terrace on Flaxman Terrace. I am sorry that this official commentary is outside of the stated time for comment but I have just started my post at The Place and the proposed development is of such concern to me and my colleagues that I should be grateful if you would take my representation into consideration when reviewing the application.

I feel it is important for the determining panel to understand and consider the organisation of whom I am an officer and making the representation on behalf of with regards to this objection. In summary, the Contemporary Dance Trust, otherwise known as The Place is a well-established and world-leading contemporary dance organisation. It has been fulfilling its charitable objectives from its current location since 1969. The Place is both an Arts Council National Portfolio Organisation and a Higher Education institution funded by the Higher Education Funding Council for England (HEFCE) through the Conservatoire for Dance and Drama. As such, anything that compromises the ability to fulfil the remit for which The Place receives public funding would be taken very seriously by both The Place's executives and Board as well as the funding bodies to whom we are accountable.

I will argue below that not only does the proposed application represent a clear and negative impact on the quality of The Place's environment and the surrounding area's environment but also constitutes a distinct threat to the delivery of the organisation's remit. In short, the application raised specific and grave concerns surrounding light, shadowing, privacy and noise in relation to The Place. As a responsible officer and Secretary of The Place and the Contemporary Dance Trust, I strongly recommend that the application is rejected.

We have carefully built and continue to sensitively manage our many relationships with the local residents and community. Such a proposal would have a significant effect on our operative ability and the existing relationships we hold dear and also create an entirely new set of challenges. The Place would likely suffer to such an extent that it could be deemed impossible to continue, in our current premises, to develop and nurture the top contemporary dance and artistic professionals that we currently achieve.

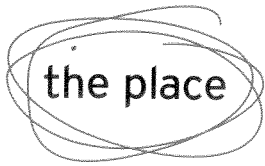
The Place 17 Duke's Road London WC1H 9PY tel 020 71211000 fax 020 71211142
email info@theplace.org.uk www.theplace.org.uk

The Place is governed by
Contemporary Dance Trust
Patron HRH The Duke of York
KG KCVO ADC

Founder Robin Howard CBE
Chief Executive
Kenneth Olumuyiwa Tharp OBE

Registered Charities Act 1960 250216
VAT Registration 233 7633 65
Registered Office: 17 Duke's Road,
London WC1H 9PY

Company Limited by guarantee
Registered in England 883094



Light and overshadowing

In the Daylight, Sunlight and Overshadowing report that was submitted with the application and which was written by Syntegra in February 2015, I note that there has no consideration of the proposed development's direct neighbour – The Place. This apparent oversight is significant and negligent in that, in the conclusions on pages 17, it only considers 1 to 18 Flaxman Court. It should be further noted that the report erroneously states that, on page 20, there is consideration for 1-18 Flaxman Terrace. The Place, at 16 Flaxman Terrace, is omitted rendering that representation invalid.

Given that the proposed building would share a party wall with The Place, the omission of the consideration of its effects on the Place leads me to conclude that this report is flawed. It is clear from the Suntrace drawings on page 19, that part of the lines, which represents the sun's paths, would result in a direct restriction of light to and the right to light into the entrance and reception area of The Place, its immediate outside area (used by students, course attendees and their guardians, parents and friends) and the studios on the first, second and third floors. Furthermore, there would be significant overshadowing of the glass façade, the studios and the outside area. This can be inferred from the drawings, the most evident being those on p 35, 36 and 37 although it should be noted that the shadowing report only considers the position from on high.

On the basis of restriction of light and overshadowing, I recommend that the application is rejected.

Privacy

Within the application, there is no consideration of the effect on the privacy impact on the studios of The Place or with respect to the entrance to the Contemporary Dance Trust at Flaxman Terrace.

The plans clearly show that the planned balcony, first floor window, roof terrace and space where the photovoltaic panels are proposed to be housed will have direct eyesight access to our studios, both on the first, second and third floors. In particular, the roof terrace is positioned adjacent and adjoining to the third floor studio window. This means that residents and visitors of the proposed property would have a direct, full and uninterrupted view into that studio with a direct uninterrupted sight path to our school students, participants of our dance classes (children, vulnerable and non-vulnerable adults) and artists.

Not only does this mean that The Place's privacy would be compromised but, by nature of our activities, we would be putting at risk the safety and wellbeing of our students, artists and course participants. As mentioned, some of the users of the studios are children and vulnerable adults, to whom we have a distinct and statutory duty of care. Not only do we take our child safeguarding responsibility extremely seriously, the development of children and vulnerable adults through dance is a key element of our vision, mission and strategic charitable objectives. As such, any threat to this legal responsibility would have a fundamental and extremely significant and serious effect on our ability to undertake our activities and purpose.

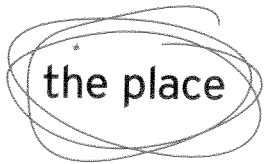
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On the basis of privacy, I recommend that the application is rejected.

Noise from new usage

The proposed development would lead to a permanent residential building adjacent to 4 of our studios, including the sharing of a party wall between The Place's studios and the proposed building's Bedroom 1, Bedroom 2, Kitchen, Dining and Living areas and roof terrace. Given that the studios are used until 10pm, there is a concern that a level of noise from the proposed residential building will impact on this use.

Music is a fundamental medium that we use in our work. Unwanted music/ noise from a neighbour would restrict/ threaten the delivery of our programming. Similarly, we would be concerned over the potential disturbance that the neighbour may encounter as a result of our work. We have worked extremely hard to establish an understanding and working relationship with our existing neighbours and are committed to working with our immediate and local community. This has included careful consideration of which spaces we use for specific classes and workshops. The potential of a further neighbour that may disturb us or we could disturb would prove complex and potentially result in a diminishing of our artistic and development influence.

On the basis of noise from new usage, I recommend that the application is rejected.

Impact of noise from plant equipment and works

Given the comments above regarding noise and the potential disturbance to our studios, it is clear that the works involved in constructing a new structure and converting the existing framework would involve considerable noisy activity, which would negatively impact on the ability for The Place to deliver its work during the period of development. This would threaten the ability for us to deliver a full programme to our students (undergraduate, postgraduate and diploma levels), class attendees as well as restricting the fundamental support that we provide to our artists.

For the reason of the impact of noise from plant equipment and works, I recommend that the application is rejected.

Design, size of new building including Environmental Impact

The proposed construction is located within a conservation area. The proposals stipulate a plan to extend the current building past its current structure not only forward but also in advance of the end wall and face of The Place's studio wall and façade and protrude out, above the pavement space. The proposed structure would alter the line of The Place's building, cause harm to the conservation area and alter the viewing and visual lines from both the south west end of Flaxman Terrace and from Mabledon Place. Since the rear of 137 Euston Road is positioned at the precise point where Flaxman Terrace changes direction, this impact from both ends of Flaxman Terrace is significant.

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As noted in the objection from the Bloomsbury Conservation Area Advisory Committee (BCAAC), the proposals would negatively impact on the environment around Flaxman Terrace and the conservation area, in which this proposed structure would be situated (as advised by the BCAAC).

Furthermore, the view lines from The Place's entrance, first, second and third floor access areas (glass fronted) and studios will be interrupted and diminished. The current view and pleasure gained from all these areas down Flaxman Terrace to Mabledon Place and beyond, down Bidborough Street, will be compromised.

On the basis of design and size of the new building as well as its environmental impact, I recommend that the application is rejected.

Yours faithfully

Mike Kostyn
Company Secretary

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