

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2016/6356/P	Fiona	88 Derby Lodge Wicklow Street	13/12/2016 15:41:01	OBJ	<p>Application No: 2016/6356/P2016/6356/P</p> <p>I strongly object to this development for the following reasons laid out below</p> <p>This development ,in all correspondence and at exhibitions has been referred to as 159/163, King's Cross Road ,yet has been submitted under a different address, Rear of 1- 3, Britannia Street which is deliberately misleading and confusing.</p> <p>This proposed development is causing a great deal of unnecessary stress to all the surrounding neighbours . This is due to the behaviour of the applicant who has been aggressive and uncooperative. Failing to divulge information, failure to provide additional information when asked and having a high handed and dismissive attitude. Despite repeated requests the information that some of us were asking for were only provided by the intervention of Cllr Jonathan Simpson. All this made residents feel that something underhand was going on and that we are an inconvenience to be got round.</p> <p>Derby Lodge is Grade 11 listed and is a 'sensitive letting' according to Camden Council's letting policy.</p> <p>The sheer scale of this development is too domineering to sit within the curtilage of Derby Lodge.</p> <p>Any development on this site should be no higher than the current roof line and profile of the existing buildings, which has never been a problem to nearby residents.</p> <p>I object to the premises being changed from light industrial to office use.</p> <p>Due to globalisation most offices are 24 hour which will mean local residents will be greatly affected by increased noise disturbance of office workers outside on terraces talking, smoking in the courtyard, lights on in offices all night. We already suffer noise issues from air conditioning units from shops on King's Cross Road and the services for the proposed new office block will increase these noise problems greatly.</p> <p>We do not need a basement art gallery situated so close to our homes. During private views there will be people standing in the courtyard and outside the entrance on Britannia Street smoking and drinking. We already have problems with the openings at the Gagosian Gallery. Who often need shut Britannia Street down for up to three weeks at a time to install exhibitions. We don't need even more of the same disruption. Visitors to a proposed basement art gallery will cause noise nuisance. It's a constrained site with flats in close proximity.</p> <p>Security</p> <p>Derby Lodge courtyard has a lot of properties on the ground floor and there will be a direct problem with security and privacy if workers are allowed access to that area. Where exactly will the office workers go in the event of a fire ? They would need access to the courtyard as the site entrance is so narrow.</p>

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#### Privacy

The terraces and windows of office block will directly face onto the properties of 73-96, Derby Lodge, Wicklow Street and will overlook our bedrooms, living rooms and kitchens causing loss of privacy

#### Daylight/ Sunlight

There will be a dramatic loss of daylight and sunlight into the all the flats facing onto the property development, with 73-76 Derby Lodge, Wicklow Street and 1-3, Britannia Street being the most affected as all these properties have bedrooms and living rooms that face onto the courtyard.

#### Overall Design

The size and shape of the proposed development is just too tall and domineering against the proportion of Derby Lodge, which is Grade II listed and the other neighbouring buildings which are in extremely close proximity to this charmless proposal. This is a Conservation Area. This aggressive, imposing and monolithic dark finish of the building is not sympathetic with the general character of the area nor surrounding architecture, It should not be so tall, have a deep basement gallery and it should not have any roof terraces.

#### Noise

Derby Lodge, although being situated within the Conservation Area of King's Cross was surprisingly quiet when I moved here twenty-two years ago. However since several air conditioning units have been added to shops on the King's Cross Road and Derby Lodge's own heating unit having been incorrectly installed, there is an excessive amount of noise from these especially at night. The heating and air conditioning units that this office block development will need will only add to this constant and annoying hum. Having a four storey office block with open terraces for office staff to enjoy coffee breaks, smoking and general chatting will create an unnecessary amount of disturbance. Due to Derby Lodge being Grade II listed we were refused double glazed windows when DL had a Major Works redecoration a few years ago. So noise is an issue.

#### Conservation and Local Community

Derby Lodge lies within a small quiet pocket of Kings Cross Conservation Area and Wicklow Street is particularly charming with it's cobbled street, which is also listed. An office block of this scale is totally inappropriate in this small enclosed courtyard which is within the curtilage of Derby Lodge. It will have a negative impact on our local community.

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Need

There are already many offices in the King's Cross Area which are empty. So why build more ?  
There will be no control as to who rents these offices and what sort of work will be carried out there.  
When asked, the developer, Balcap Re , had no idea how many office workers would be squeezed into these offices. Also the developer is anxious that the office workers have access to sunlight, daylight and can relax on the terraces, whilst not considering the loss of privacy and daylight that will detrimentally affect the nearby residents.

Light Pollution

The lights from these offices will flood our homes with artificial light at night which will have a detrimental affect on our sleep.

Rubbish

We have a constant problem with rubbish and litter in this area which has increased since the student halls of residence, The Depot, was built. For example The Depot, which has 250 students living there leaves it's rubbish outside on Britannia Street. If this office block and art gallery are developed they will be leaving their rubbish outside in front of the private homes of 1- 3 Britannia Street.

Use

If this site has to be developed it should either stay as light industrial or changed to residential.  
I do not think this site is suitable for offices.

Demolition and construction of site

The proposed length of time for this development is 18 months.  
Since the gallery space will be in a basement , this will mean they will be digging 4.5 metres into the ground to create this space, I thought Camden Council's policy was only to dig to a depth of 3 metres so surely an extra 1.5 metres should not be allowed.  
It's not as if the basement area is already there. The devastation caused by digging and hauling the tons of earth through the small entrance of the site on Britannia Street will seriously affect all the neighbouring properties for the build length. The developer and architect have not shown any understanding or regard for the people who already actually live here. Apart from a lot of elderly people, residents who work from home, and there are also a number of families with small children whose day to day lives at home will be disrupted by the noise of drilling, digging etc for the entire eighteen months.

Britannia Street will undoubtedly be closed for most of the earth removal and construction. Leeke Street is closed until 2020 whilst the bridge over the railway track is being strengthened. There are also

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plans to build yet another cycle lane down King's Cross Road and all of this will probably coincide with the work intended on the Mount Pleasant site. This will cause total traffic gridlock in an already heavily congested area.

In September the Gagosian Gallery had a Richard Sienna exhibition installed which closed Britannia Street for three weeks. This then meant local residents had to drive a mile detour to gain access to Wicklow Street which is one way.

And if all the resident bays were full we'd have to drive the same detour to get back into Swinton Street. I need my car to work ....it was distressing enough to have to do this for three weeks, eighteen months will be too stressful.

The loss of permit bays in Britannia Street will create even more problems regarding parking.

Objecting to planning applications at Camden Council

Since the beginning of October Camden Council has changed it's policy of posting planning applications to all residents who will be affected by a new development. Unless you are registered on-line for Camden's Planning alerts you will be unaware of any applications. Camden's Planning department do put up limited signage and advertise in the Ham & High and Camden New Journal but as neither of these papers are stocked in our immediate newsagent how are residents who have no access to the internet supposed to know ?

Planning Application Notification on Wicklow and Britannia Street

According to these signs the site has now grown and Derby Lodge's heating unit is now included in the development.

Does this mean that Balcap Re intend to remove Derby Lodge's heating unit and that all residents will be without heating and hot water ?

Consultation with developers Balcap Re and Four Communications

Finally I need to say something about Four Communications, the PR company who organized the 'exhibition'. There was never any participation nor proper consultation with local residents. I have found Four Communications uncooperative. As they are a slick PR company who are being employed by Balcap Re they obviously have a financial interest in their client.

In the document that they have submitted with the planning application there are a number of issues I'd like to address.

1) The 'exhibition', was never referred to as a consultation, was organized by Four Communications to be held at a community centre in Argyle Street which is on the other side of the Gray's Inn Road which has four traffic lanes and is difficult for the frail, elderly and disabled to navigate. I had several telephone conversations with various Four Communications employees and it was only when I asked for the CEO's name and address that a Ralph Scott spoke to me and said ' it was not Four

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					<p>Communications company policy to give out that information'. I wanted to know why the exhibition couldn't be held on the site, as is common with these type of developments. Ralph Scott finally admitted that it wasn't cost effective for them to pay a cleaner to clean the floor for a one day exhibition.</p> <p>2) The publicity they used was a very slick leaflet with little real information on it. Ralph Scott told me 1,500 leaflets had been distributed but didn't know exactly where and would have to get back to me about that.</p> <p>3) The first event was held at 51, Argyle Street, WC1H 8EF. Only seven residents attended due to that location not being part of our community. Derby Lodge post code is WC1X.</p> <p>4) The boards that they were exhibiting lacked any graphics showing the elevations of the proposed development that would be facing on to 73, 96, Derby Lodge , 1-5, Britannia Street and the rear of King's Cross Road This was an important piece of information that they had chosen not to exhibit. So I asked that we would need these elevations to be at the second exhibition. I also asked that pdf's of the boards that were at this first 'exhibition' could be emailed to me. Although promised Four Communications didn't send them to me.</p> <p>5) After several residents and the Derby Lodge TRA complained about the location of the first exhibition site Four Communications finally agreed to another 'drop in' event on Tuesday 18th October, which was held at our TR Hall which is situated in Derby Lodge Courtyard and a place which is known to local residents so more convenient to attend.</p> <p>6) Four Communications promised they would send the information about this second 'exhibition' to local residents via Royal Mail yet nothing arrived in the post. Why ?</p> <p>7) 21 residents attended this meeting.</p> <p>8) The one elevations that I requested were there. I asked that pdf's of these images be emailed to me . I asked Clemente Capello, the property developer from Balcap Re,, Andrew one of the MWA architects and Laurie Sanderson from Four Communications to do this. And I took all their email addresses. The MWA email address proved to be wrong.</p> <p>9) Three of us took Clemente Capello, the property developer from Balcap Re, to the outside of our flats to show how this office block development would negatively impact on our homes. I asked if he and one of the architects could come and visit my home in daylight to see why I was objecting and both of them replied that they were too busy.</p> <p>10) I made it quite clear to Clemente Capello that I did not want an office block built in the courtyard and would prefer social housing. He was surprised and said 'you wouldn't want social housing here', as if social housing was a negative thing. And one of my neighbours replied ' we live in social housing'.</p>

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					<p>11) None of the pdf's that were at the second 'exhibition' that I requested to be sent to me were emailed to me. And I was told by Clemente Capello that all correspondence had to be done via Four Communications. And all of them refused to send me the elevations that they had promised me.</p> <p>12) I then had to contact Cllr Jonathan Simpson who asked for them on my behalf. It took him a week before they sent what they had initially promised me. Despite being contacted by a Councillor, they again appeared reluctant and slow to provide the information.</p> <p>13) In Four Communications response to key issues they say, regarding a daylight, sunlight and overshadowing report by a, Malcolm Hollis ,that it demonstrates that the majority surrounding properties will meet the BRE guidelines used to access levels with the exception of ONE window in a property in Wicklow Street. Where is this one window ? The report is incorrect and wildly inaccurate to claim only a single window will be affected. And I can assure you that both my bedroom and living room windows will lose a considerable amount of daylight and sunlight and will be overshadowed along with a lot of my neighbours properties too.</p> <p>Neither Malcolm Hollis nor any of his colleagues has visited my flat, nor those of any of my neighbours. His report is entirely self-serving and I do not believe it to be accurate.”</p> <p>14) Concerned Residents of Derby Lodge organised a further meeting on 1st November at the TR Hall and Balcap Re, MWA, Four Communications and Planning Officers Neil MacDonald and Laura Hazelton were all invited to come. Balcap Re, MWA and Four Communications all declined to attend. So there has never been any any real participation or proper consultation with local residents which one would expect with such a contentious development .</p> <p>Fiona Dealey 88, Derby Lodge Wicklow Street London WC1X 9LF</p>

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2016/6356/P	Colin Goodbourn	64 Derby Lodge Wicklow Street London WC1X 9LG	16/12/2016 19:07:05	OBJ	<p>I am a resident of Derby Lodge, every window in my flat faces the courtyard at the back of the building.</p> <p>I wish to make the following comments about this planning application.</p> <p>The proposed office building will create an overwhelming sense of enclosure at the rear of Derby Lodge due to the proximity of the building to existing residential properties, and the height of the offices. I am very concerned about the loss of outlook and light especially to apartments at lower levels..</p> <p>Whilst i appreciate all kinds of architecture i feel strongly that the design of this proposal is not a good example of modern architecture when proposed in a conservation area adjacent to Grade 11 listed buildings..</p> <p>As the proposed building is intended for use as offices i am very concerned about 24 hr a day light pollution all of the windows in many existing properties all face directly onto the courtyard.</p> <p>I am concerned that there will also be noise from airconditioning and heating systems from this proposal which will affect everyone living around this office block. I am also concerned that there will be noise from people using the proposed terrace on the building which will also be overlooking existing properties.</p>
2016/6356/P	Aleksandra K Krotoski	82 Derby Lodge Wicklow St WC1X9LF WC1X9LF	14/12/2016 18:25:27	COMMNT	<p>I am an owner of a flat in Derby Lodge and I believe the process of building this building will negatively impact my living situation both throughout the building process, and subsequently for the following reasons:</p> <ol style="list-style-type: none"> <li>1) the demolition stage of the building process will affect the communal boiler room for the property, leaving many of us without heating or hot water</li> <li>2) building a basement in the courtyard of Derby Lodge will negatively impact the residents on the ground floor, and may affect the integrity of the residence.</li> <li>3) the ongoing building work will affect the living quality of residents - both those who stay at home during the day (e.g., parents of small children; those who work from home), and will affect the integrity of security for the residents with direct access to the courtyard.</li> <li>4) the height of the proposed building will negatively impact the light access of those on the bottom floors.</li> </ol> <p>Many thanks for your time and attention to my comments on this matter.</p>

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2016/6356/P	Tim Wood	flat 10 derby lodge britannia street wclx 9bp wclx 9bp	11/12/2016 18:17:00	OBJ	<p>Dear Sir/Madam,</p> <p>I am objecting to the planning proposal on the following grounds.</p> <p>1. Loss of light.</p> <p>The only natural light my flat receives is in the bathroom, bedroom and kitchen, all areas of the flat which face to the rear of the building. The proposed application would block these forms of light which would affect my mental health and overall quality of life.</p> <p>2. Noise. Derby lodge is a grade 2 listed building and as such the council refused to replace the single glazing glass. My bedroom would be around 20 feet from the building works, with my night shifts, late working as well as my chronically ill partner whom I care for, the noise would disrupt our rest and badly affect our health.</p> <p>3. Privacy.</p> <p>The office would have views into my bathroom, kitchen and bedroom, in order to maintain privacy of my home and myself I would need to have the curtains drawn all day.</p> <p>4. Community</p> <p>Derby lodge is a grade 2 listed building, surrounding the proposed office site are residential buildings populated by the vulnerable, elderly, mentally ill and disadvantaged. This office block makes no sense with the feel of the community and will be driving away character from a conservation area.</p> <p>I invite your light assessors into my home to see how this will impact us. I do not believe this site is appropriate or needed.</p> <p>May I ask how my feedback will be looked at and dealt with?</p> <p>Kind regards</p>

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2016/6356/P	Fabrice Ouakinine	94 Derby Lodge Wicklow Street	10/12/2016 13:56:30	OBJ	<p>I have lived here for over 16 years and would not have brought my property if I thought such a huge overbearing building would be built outside my bedroom window!</p> <p>I live on the 3rd floor in Wicklow Street and my bedroom and kitchen (50% of my flat) will be subjected to a noisy office just metres from me. I am very concerned I will have nowhere to relax in my own home since I will have a busy street on one side and I will lose the quietness of the courtyard on the other.</p> <p>I will not lose any light during the day but I am concerned about light shining into my bedroom in the evening when I try to relax and sleep.</p> <p>Due to the development being so close to my bedroom window, I will have no privacy from the office workers.</p> <p>The size of this development is not in keeping with the area or surrounding buildings and is almost double in size and will be very overbearing and oppressive.</p> <p>The proposed black building is ugly and will make the courtyard look dark and dinghy. The current building may not look smart or trendy at the moment, but it is in keeping with the historic nature of Derby Lodge which I am proud to live in.</p> <p>If I had not been made aware by the Derby Lodge Concerned Residents group, I would not have realised how badly affected by this overbearing building I would be because the developer info that was sent to me is a little misleading and plays down how big this will be and how close to my home it will! At the exhibition I did ask why they were only showing pictures of two sides and not the side I will be forced to look at every day?</p> <p>I would prefer it to stay the same size, use lighter "london style" bricks and frosted windows. No late night office hours also.</p>

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2016/6356/P	F C BACCANELLO	3 Britannia Street WC1X 9JT	15/12/2016 19:05:39	OBJ	<p>In this comment of the proposed development of Rear Of 1-3, Britannia Street, London, WC1X 9BN I have outlined 8 key objections and issues with the proposed development, which will have a considerable detrimental effect and harm on the amenities of current residents. I have also suggested mitigating actions the developer can undertake to remove or lessen the detrimental effect the proposed development will have upon our property 3 Britannia Street.</p> <p>The key issues are:</p> <ul style="list-style-type: none"> <li>• Loss of Light and Inaccuracies of Daylight and Sunlight Report,</li> <li>• Loss of Privacy,</li> <li>• Waste Management Strategy will directly affect 3 Britannia street and create unsafe and unhealthy environment,</li> <li>• Increased Noise and Evening usage from Development,</li> <li>• Noise Pollution,</li> <li>• Light Pollution,</li> <li>• Detrimental Change of Character of Conservation Area</li> <li>• Lack of Affordable housing within Development</li> </ul> <p>Additionally, I have sent a paper copy of my comment to the address Development Management, Camden Town Hall, Judd Street, WC1H 9JE. Please read and refer to this report as it contains pictures and diagrams (cannot be submitted online) outlining some of the more serve issues, including a number of windows that are missing from the Daylight and Sunlight Report.</p> <p>1) Loss of Light and Inaccuracies of Daylight and Sunlight Report:</p> <ul style="list-style-type: none"> <li>• The two main complaints regarding daylight are the inaccuracies within the Daylight and Sunlight Report (provided as a supporting document to the planning application) - which omits the existence of 5 windows (that we can observe) and omits outdoor amenity area, and assumes that we and our neighbours do not use outdoor areas in spring – and the loss of light to our property.</li> </ul> <p>Inaccuracies within the Daylight and Sunlight Report</p> <ul style="list-style-type: none"> <li>• For 3 Britannia Street a ground floor amenity area containing two windows has been completely left off the Daylight and Sunlight report, both for windows measurement and amenity areas. This area is clearly visible and it is inexcusable that it has been left off the report.</li> <li>• The amenity area is the only outdoor area for the ground floor flat of 3 Britannia Street.</li> <li>• The two windows that are missing from the report are important to us. One is the only source of light for a bathroom and the other, more importantly, one is the only source of light for a living room and do not appear on sunlight report.</li> <li>• These are one of numerous errors within the report. For instance, very large and very visible window on 5 Britannia (circa 12ft by 5ft) is completely omitted. The missing items lead me to question the validity of the report as, not only are they easily observable but they are also the areas of the properties (3 &amp; 5 Britannia street) that stand to lose the most amount of light. It seems hard to conceive that a competent light report could accidentally omit these window; leading us to question the validity and bias of the report.</li> <li>• The report also omits or skylight windows on properties for 159 to 163 (p30 of lighting report) are</li> </ul>

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also missing, and these windows are likely the only source of daylight for the below rooms.

- For instance, applying the area loss and gain to A1 on the above diagram would mean that substantial daylight hours loss to the omitted amenity area. This would, with high certainty, that the Proportion receiving at least 2 hour of sun on 21 March would fall below BRE target of 50%, given it is currently at a marginal rating of only 52%. Similarly, for 5 Britannia Street, given that most of the amenity area will lose light (only 9% with 2 hours of daylight), down from a large majority that the missing window would fall far below BRE requirements.
- The report also suggests that “It is conceivable that most amenity spaces are mainly used during the summer months.” There is no basis to back this incorrect assumption. We, my wife and I, use the amenity area throughout the year, but also use it heavily in spring and March. We are at the stage were next year, health permitting, we will be parents; meaning need for outdoor area and sunlight will increase drastically. Likewise we constantly see our neighbour using his outdoor area.
- Additionally, we have planning permission and are starting building work on the amenity area such that it will be more pleasant for our use and more importantly safe for young person. Part of this development includes a skylight to provide additional light to the room below the amenity area. Both the amenity area and the window light would, on the basis of the provided Daylight and Sunlight Report, be adversely affected by the development.
- It should also be noted that when the developers exhibited the development to the local community. Myself and numerous others invited them to our properties (they even took down my name, address and contact details) so they could better judge the full impact of the development upon our lighting. After this meeting we had heard no contact. Had they wished to complete an accurate report with inspection of our properties they could have easily arranged it. This offer still stands.
- It seems hard to conceive that a competent light report could have accidentally missed the very large window and a whole amenity area. Leading me to suspect either an incompetent, incomplete and therefore invalid light report, or that these areas have been deliberately left out to make the report appear better against BRE requirements (e.g. for at least 50% of areas receiving at least 2 hours of sunlight on March 21) which the development already fails to meet, though would do much worse if missing amenity and windows were included.

Loss of Light:

- The report shows that we will suffer a significant loss of light, we object to. Above I have highlighted the serve loss of sunlight hours to amenities. We will also see a 46% decrease APSH in winter time (when light is already rare) daylight hours, below 50%, on a first floor window (noted as W2 on report) which is a kitchen. According to BRE guidelines a decrease of >40% is considered “substantial impact”. This impact will greatly decrease the utility and enjoyment of the kitchen.
- It is clear that windows left off the report (as mentioned above) will be affected to an even greater extent, and will likely lose the remaining sunlight they get.
- We also consider the amount of light we lose on our outdoor amenities unfair. The report, which misses out a large area of the amenity, says our March 21st area receiving more 2 hours of sunlight will decline to 52%, barely considered “Adequate” under BRE guidelines. While the extent of the loss, which is 23% (nearly a quarter), is in excess of the “20%” BRE guidelines state as noticeable, while our neighbours will suffer a loss of 39%, to only 9% of their space receiving 2 hours of sunlight (see p 45 on Daylight and Sunlight report)

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- The development, due to its excessive height, impinge and harm the use of our only outdoor space through serve curtailing of the sunlight it currently enjoys. This would be detrimental to all residents within the property (and even worse for 5 Britannia Street neighbours), which may soon include a child, and will severely curtail the ability to use and enjoy affected amenities and room.

- In the DAS the developers state that:

“Collaboration with Malcolm Hollis from the early stages of design ensured that there will be no discernible loss. Furthermore working closely with the neighbouring residents through a series of public consultation have also ensured that there will be no adverse impact with regards to the daylight and sunlight enjoyed by the residents. Refer to Daylight/Sunlight report by Malcolm Hollis”

The above is clearly untrue, not only is there significant loss of light, the Daylight/Sunlight report by Malcolm Hollis illustrates that they fail to meet BRE criteria and there is a discernible loss of light. But there was no official consultant with the community (unless this was the event they termed an exhibition of the plans), but the plans have in no way been altered to reflect the view expressed by the local community during aforementioned “exhibition”.

#### Suggested Mitigations:

- Lowering the height of the proposed structure: When the developers presented their plans to the community, we were not told it was a consultation, numerous concerns were raise about the height of the proposed structure, however there was not alteration to the height of the building from exhibited plans to submitted plans. At the proposed height of the building it will inevitably and detrimentally restrict day light to existing residents. We suggest that the plans of the development be modified to keep the current height and profile of the existing building.
- Removal of rooftop triangular sedum roof: In addition to the top floor of the building there is to be large triangular sedum roof. These further decrease light to existing properties at the expense of existing residents. We propose that these are removed from the development.
- New Daylight and Sunlight Report Commission by Council planer recommended consultant: The existing Daylight and Sunlight Report is incorrect to the extent of being negligent. We propose that a new report be commissioned, that accounts for all windows and amenity areas. Additionally, the developers have shown themselves unable to select a competent and/or unbiased Daylight and Sunlight consultant, as illustrated by the poor quality and numerous mistakes within the report. We propose that the Daylight and Sunlight consultant be chosen by the community or by the council planners.

#### 2) Loss of Privacy:

- The new building will back onto our property with windows considerably less than the 18meters required meter from our only outdoor amenity space, which is in constant use, and from windows to our bedroom and kitchen. This is less than the 18m required by BRE and Camden Planning Guidelines.
- As a results our privacy will be affect negatively, preventing us from enjoying reasonable privacy.
- The development proposes that louvres (suggested being aluminium slats) are put in place to mitigate this. However, this is not sufficient having both worked in offices with lourves and looking at the plans, the lourves will not fully block all views of our property (the DAS says they only limit), thus our privacy is still harmed.

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- It should be noted that in the planning statement the developers demurs from creating affordable housing because. "In order to avoid an unreasonable degree of overlooking to nearby residential units the design of any new residential unit on the site would be designed in a manner that would unduly restrict the outlook of that property and would therefore impact on any future occupier, should housing be accommodate at the application site." The developers themselves consider the building, if used for residential would create and "unreasonable degree of overlooking to nearby residential units". We would suggest that an office building, which would be in use at all hours of the day would also create an "unreasonable degree of overlooking to nearby residential units".

- Policy DP26 still requires measures to be taken to ensure that the privacy of residential occupants is maintained. The current development does not maintain our privacy but instead reduces it. We have no wish for the occupants of our property, especially children, to be subject to the stares of unknown strangers.

Suggested Mitigations:

- Lower Building Size: The current proposal suggests and 55 full time workers, this will create unduly high levels of traffic. We suggest to mitigate the noise effects that such a large increase in local population that the size of people within the development be limited.
- Reduce Building Height: Were the top floor of the proposed development removed from the plan then there would be a significant reduction in the privacy invasion and "unreasonable degree of overlooking" in adjacent residential properties.

3) Waste Management Strategy will directly affect 3 Britannia street and create unsafe and unhealthy environment.

- The below diagram shows that for waste disposal 8 x 240 litre bins will be placed in front of 3 and 5 Britannia Street.
- The DAS suggests that these will be placed disposal 8 x 240 litre bins will be placed in front of 3 and 5 Britannia Street on the day of waste disposal and removed thereafter, they provide no plans or measure on how this is to be accomplished suggesting lack of research and knowledge of the surrounding area.
- Rubbish on Britannia Street is collected 3 times a week on Monday, Wednesdays and Fridays. It is typically collected early in the morning normally before office hours. This means the new development would have to leave 8 bins in front of our property of 3 Britannia Street from the close of business (17.00) until opening of business (9.00am) the next day.
- This means that rubbish will be amassed in front of our property for at least 16 hours three times a week, creating a potentially unsafe environment for residents, especially for children.
- Furthermore, the current Britannia Street residents are unable to use waste disposal bins, due to high crime levels, as all previous bins have been stolen. Currently waste is left for collection in bags, and, due to high local crime rate, they are often ripped open through by homeless people or miscreants, creating a further unsafe environment. Additional waste from 8 bins in front of our property will on increase this issue main fold.
- Having 8 bins outside our property also prevents us from enjoying the view from our ground floor window and would create unpleasant and unhealthy odours which would be servery detrimental to the enjoyment and health of our property.

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- Secure off street storage for collection with private collection: The reasonable solution is for the development to plan to storage waste for collection within their property, as opposed to on the street, and either have private waste collection recover it from there.

#### 4) Increased Noise and Evening usage from Development:

- The existing light industrial concern within the development property was in regular daily use until the recent purchase of the property by the developers. However, this use ended at 5.00am or earlier and had very light traffic and footfall with little or no discernible noise effect on us as directly adjacent neighbours.

- The new proposed development, with a proposed 55 office desks, will lead to considerably increased noise levels outside regular business hours; the hours in which we use our home.

- Office hour in London are no longer restricted to 9-5, this means that they will be constant entry and egress from the property. The opening and closing of entrance door, as given high crime rate they cannot be left open at night, will create additional noise: door banging and security cards beeping. Given a significant amount of this noise will be create in evenings and early mornings this will prevent us from the quiet enjoy of our property.

- The proposal to use the basement and/or other areas as a gallery and exhibition space further exacerbates the problem. Galleries predominately hold exhibitions outside office hours and often in evenings or night. This will extra traffic outside in the evenings and mean that people will congregate outside the building entrance (e.g. smokers) which is directly next to our front door and window. This will drastically increase noise and result in further loss of privacy and quiet enjoyment of our property. Suggested Mitigations:

- Lower Building Size: The current proposal suggests and 55 full time workers, this will create unduly high levels of traffic. We suggest to mitigate the noise effects that such a large increase in local population that the size of people within the development be limited.
- Restrict building use to reasonable 08.00-18.00 office hours, only: Use of the building should be mandated to be restricted to reasonable office hours, such as 8.00-18.00.
- Do not use basement, or other areas of the building, for uses that require and/or encourage night or evening time activity: Social, leisure and night-time focused uses of the building be prohibited as a use in order to prevent undue disturbance to local residents, especially those adjacent to the property in 1 & 3 Britannia Street.

#### 5) Noise Pollution

- The courtyard area within the developed is proposed is surrounded by residential building. This creates the effect of an echo chamber which magnifies noise.

- The development with an outdoor terrace, air conditioning and heating, and extractor fans from waste storage (which will pipe foul smelling waste gas into the courtyard) will all create on considerable and often constant noise.

- The development, in its current form, will further create increases to this noise which will likely render quiet enjoyment of outdoor space, such as our roof terrace impossible (e.g. without the background noise of constant air-conditioning fans and exhaust fumes), while also meaning it may become unpleasant for us to open our rear facing windows.

- There is little in the submitted planning documents that addresses this issue.

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Suggested Mitigations:

- Restrict building use to reasonable 08.00-18.00 office hours, only: The acoustic suggests that air conditioning units only be used during office hours, however the modern office hours often range far into the night and people often work within weekends. Office workers cannot go without heating/air conditioning thus we propose to that building use is limited to 8.00-18.00 in order that residents may have quiet enjoyment of their property.

6) Light Pollution:

- The building will be in use beyond normal working hours, including the necessity of cleaners cleaning offices. This means that strong office lighting will leak out of proposed windows into the shared courtyard through windows.
- The proposed inclusion of triangular sedum roof with windows at the top of the building will further escalate this issue, as these will point directly at our property and will project harsh office light over a greater distance, and spoil night time use of the courtyard and nearby properties.
- In our, 3 Britannia Street, specific case light pollution will leak into an upstairs bedroom, not a desirable effect for a room people sleep in.

Suggested Mitigations:

- Removal of rooftop triangular sedum roof: This would serve to cut light pollution significantly.

7) Detrimental Change of Character of Conservation Area:

- Our property, 3 Britannia Street, is a grade 2 listed building. The majority of the buildings surrounding the property are also listed buildings.
- The design of the new development is highly modern and, as a result, would destroy the unique characteristics of the area. Two aspect of the building are significantly detriment to the charter and stand out against the existing buildings: the louvers and the triangular sedum roof.
- The proposed louvers are suggested to be aluminium, this is against the character of the area while they together with the triangular sedum roof also give a distinctly modern feel in an otherwise old listed area.
- The Camden Council's King's Cross / St. Pancras Conservation Area Audit notes that: "New development should be seen as an opportunity to preserve or enhance the character or appearance of the Conservation Area. New development should respect the built form and historic context of the area, local views, existing features such as building lines, roof lines, elevational design, and where appropriate, architectural characteristics, detailing, profile, and materials of adjoining buildings. Proposals should be guided by the UDP in terms of appropriate uses." The current development proposed is clearly not in keeping with listed buildings within the area including, but not limited to DL flats 1-48 and DL flats 49-144.

Suggested Mitigations:

- Redesign of building to match current area, including removal of louvers and triangular sedum roof.

8) Lack of Affordable housing in development:

- The area has a high proportion of affordable housing and the developers are neglecting their

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					<p>obligation to create affordable housing that would benefit the community.</p> <ul style="list-style-type: none"><li>• The Planning statement says that “he proposed development results in an increase in commercial floorspace of 371.7sqm GEA (310.3 sqm, GIA) providing a total GEA of 973.6 (878.6sqm GIA). As such, the proposal triggers the requirement of 50% of this additional floorspace to be provided as residential floorspace which results in 185.85 sqm GEA.”</li><li>• The primary rationales provided by the developer for not fulfilling their obligation to create affordable housing is that they cannot create a split entrance, a highly questionable ascertain given the width of the entrance, and that there would be “unreasonable degree of overlooking”. However, later in report they contradictory argue the building, as an office, would not create an infringement on current resident privacy (unreasonable overlooking), suggesting that either the office build would mean a significant lose of privacy to existing residents or that the privacy reason for refusing affordable housing is spurious.</li></ul> <p>Suggested Mitigations:</p> <ul style="list-style-type: none"><li>• Build required affordable housing.</li></ul>

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2016/6356/P	S Sims	Derby Lodge Wicklow Street	16/12/2016 14:52:53	OBJ	<p>I am writing in objection to this planning proposal.</p> <p>In summary, the proposal is to build a four storey office block within a confined, small, residential courtyard. It seems obvious that this raise an eyebrow at least, so I would like to hear Camden Council defend how such an obviously inappropriate and insensitive proposal was allowed past pre-application phase please?</p> <p>So, to state the obvious,</p> <ol style="list-style-type: none"> <li>1. This office block is like a giant boulder, hoisted like a bomb, into the centre of the Derby Lodge community. Derby Lodge is a close community, where neighbours from all three sides (Wicklow Street and Britannia Street, plus the shops and flats on Kings Cross Road) know each other and help each other, in what is already a problematic area for social nuisance and the huge traffic black spot of the Kings Cross gyratory. The public-facing front of our flats are noisy and sometimes quite frightening with the sounds of people shouting and dealing – particularly for those on the lower floors for whom this experience is very immediate. The back of our flats, ie the Courtyard, is a pool of peace – dark and very quiet, with very limited access by key. The courtyard at the back is the necessary counterbalance for residents to the hyperactivity, noise and drug traffic at the front. An office block would eliminate this sanity-sustaining resource immediately. It would also put an oversized lump of alienating ‘architecture’ right bang in the middle of where we current overlook our neighbours, at a respectable but still connected, distance. So this proposal should be rejected because of its ruinous impact on our community.</li> <li>2. Derby Lodge is in Kings Cross conservation area. This proposed office block shows no sensitivity to the character of the conservation area. If it wished to be appropriate to the conservation area, it would retain the form, dimensions and original brickwork of the existing building, and then show some architectural ambition by using creative approaches to work with the existing building and form to create new opportunities out of this heritage courtyard, without obliterating what is already there. So, this proposal should be rejected because it is entirely inappropriate and insensitive to Kings Cross conservation area.</li> <li>3. Derby Lodge is a listed building. It is notable that the designs provided in the exhibition by Balcap Re obscured the existing listed buildings to vague, irrelevant lines in the background – not the fully featured, heritage-enhancing (and lived in!) buildings that they are. This office block dominates and obliterates the valuable social and architectural heritage of Derby Lodge. Additionally, it could be argued that the existing workshop is listed by association with Derby Lodge. What is clear is that compressing a 4 storey office block into this small residential courtyard shows no respect for the listed buildings which surround the site. So, this proposal should be rejected because it ridicules the Grade II listed status of the Derby Lodge estate.</li> <li>4. We have foxes living in the Courtyard. This may not seem like a big deal, but they are our only source of wildlife. We do not hear any birds, and we cannot see any trees. So watching the foxes walking over the existing workshop roofs is a huge joy, particularly for those, like me, who are housebound.</li> <li>5. This proposal breaches both the 25 degree and the 45 degree rule. Increasing the height of the building from the existing 1 storey + pitched roof, to 3 storeys high, within just a few metres of residents bedrooms and living rooms will cut the light to those rooms significantly. Front my bedroom and kitchen window I have a fully open aspect onto the Courtyard, then on to my neighbours in the Derby Lodge flats and houses on Britannia Street, and then up beyond Pentonville Road. My windows</li> </ol>

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receive a lot of light presently. Indeed, as I am housebound due to disability, daylight and sunlight is the aspect I value most in my home. Under this proposal, I will instead have a vertical wall just a few feet from my house. The impact on light to my windows will be massive. I cannot see how the Council Planner, having visited the site, thought it would be acceptable to inflict such darkness and claustrophobia on the scores of residents who directly overlook the site. So, this proposal should be rejected due to the unacceptable reduction on light and outlook to my windows.

6. This proposal should be rejected because the office block is entirely out of scale within the context of a small residential courtyard. The design and mass of the building will dominate the (listed) Derby Lodge flats, and the houses of Britannia Street. Any development should be restricted to the form and mass of the existing workshop.

7. It is inevitable that the office block will generate noise nuisance for the surrounding residents. There are various open-to-the-air areas within the designs, where office workers will gather to smoke or to relax from their offices, plus additional air conditioning units etc. Derby Lodge courtyard is an intentionally secure and quiet area – access is by key only. Residents rely on the quiet of the Courtyard to mitigate against the noise and stress of Kings Cross. Office hours in London are 24/7 and the Council have confirmed that they would not be able to legally restrict occupants to a 9-6 working day. As such, residents would have to put up with this new source of noise pollution 24 hours a day, all year. The Council are already trying to resolve the noise pollution from the air conditioning units at the back of the shops. Also, it needs to be remembered that this is a small, enclosed Courtyard. From within my bedroom, I can hear every word of a person speaking anywhere around the site. The sound – any sound – echoes around that Courtyard. Allowing additional, new sources of noise pollution would be cruel. This proposal should be rejected because of the inevitable noise pollution and stress it would cause in this highly noise-sensitive Courtyard.

8. The Council has long taken steps to ensure the security of the courtyard for residents, particularly those on the ground floor. This proposal will provide new sources of insecurity for those residents. Indeed, the developer's own drawings show people wandering around the Courtyard. This shows how little they have understood the security issues for residents (and how little they have sought to understand). This proposal should be rejected because of the increased insecurity it would occasion to Derby Lodge residents, particularly as we already live in the socially challenging area of Kings X, where the amenity of security is rare and highly valued.

9. The proposal should be rejected because of the artificial light that will emanate from the proposed office block at, potentially, all and any hours. The Courtyard is currently entirely and intentionally dark. We rely on this darkness to allow us to sleep well.

10. This office block will provide places from which residents will be overlooked, including into our bedrooms and living rooms. The proposal to put ugly screens does not solve the problem, but rather creates new ones – the proposed screens remind me of the fag ends of platforms at Paddington Station. This proposal should be rejected because it enables residents to be overlooked, and their privacy to be infringed.

11. This proposal should be rejected because of the proposed change of use from light industrial to offices. The talk of 'bringing jobs to Kings Cross' is a nonsense. Kings Cross is in central London – there are office jobs aplenty all around. Even if we were to take seriously the developer's implied concern about 'jobs for locals', a light industrial development would offer much greater opportunity to the demographic of Derby Lodge and the other immediate surrounding housing areas. Additionally, it is

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					<p>(at best) naïve to think that more offices will be needed in a Brexit era – what use an empty office block?? If there is change of use, it should be to housing, which is definitely needed, as are light industrial jobs in this area. This proposal should be rejected because it proposes change of use from light industrial to offices.</p> <p>12. Finally, the developers have submitted a Statement of Community Involvement. Please note that this document is a fiction. The developers did an ‘exhibition’. Indeed they called it an ‘exhibition’. This was not a consultation in any accepted use of the term. The community, under the auspices of Derby Lodge Tenant and Residents Association, undertook a consultation leading on from the ‘exhibition’, and provided a full set of results and suggestions to the developers (the same document was supplied to the Planning Department and our Councillors). None of the suggestions were adopted or even acknowledged by the developers. Secondly the community offered to undertake a Community Planning Approach with the developers, to explore a proposal that would meet with the aspirations of the developer and the requirements of the residents. The developers rejected this offer. The community also asked for drawings which would show different elevations, as would be experienced by Derby Lodge residents, as most residents said they didn’t understand what it would be like from their floor / building. The developer has never provided these drawings. Councillors and Planners should take note that the developers are not behaving transparently or cooperatively. This is very frightening for us, as we of course have to rely to on the Council to manage this process with integrity. Bearing in mind this proposal is in breach of so many of Camden’s own policy docs, it is very worrying that this proposal has got this far.</p>
2016/6356/P	Mohammad Khan	16 Derby Lodge Britannia Street London WC1X 9BP	15/12/2016 13:33:29	COMMNT	<p>Dear Sir</p> <p>I live in 16 Derby Lodge and I have objection to this new development at the rear 1-3 Derby Lodge due to following reasons.</p> <ol style="list-style-type: none"> <li>1. As it will be higher than the existing building and would affect our privacy.</li> <li>2. This particular area is sensitive area/conversation area and vulnerable people live here and due to this office block, people would be coming out and in all day long and in offices most of the people work late, so no peace.</li> <li>3. The building work go on for 18 months and we have to put with this dust/noise etc. for such a long time.</li> <li>4. There would be more vehicles and rubbish on the street</li> <li>5. Once the building will be ready, Air-conditioning of the new office block would be very noisy.</li> <li>6. Lights on all night</li> </ol>

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2016/6356/P	Darren Brade	94 Derby Lodge Wicklow Street	10/12/2016 13:35:44	OBJ	<p>Camden Council classifies Derby Lodge properties as "sensitive lets", yet this proposed planning will create an intrusive element to a very tranquil courtyard space overlooked by the bedrooms of all Derby Lodge properties.</p> <p>NOISE POLLUTION: I am on the 3rd floor and will immediately overlook the terrace/window area from 50% of my flat (my kitchen and bedroom overlook this development), I will have office noise and conversations all day long from multiple people with no rest bite. Derby Lodge is a Grade II listed building and I have been denied by Camden Council from having double glazing fitted. I, like all the other residents at Derby Lodge, have single pane sash windows that do not block out any street/courtyard noise, from my bedroom I can hear any conversation in our quiet tranquil courtyard. Also any extra fans or air-conditioning in this quiet courtyard will seriously affect my single glazed flat.</p> <p>PRIVACY: There will be a lack of privacy because the top floor of the development will overlook my flat, I will have to keep my blinds closed all day long and not go near the windows.</p> <p>SIZE: Due to the sensitive housing of Derby Lodge on both sides of this development and the rear of the residential flats on King's Cross Road, this development is almost double the size and inappropriate to a location classified as "sensitive housing". This property should stay its existing size and not have windows overlook residents properties.</p> <p>LIGHT POLLUTION: I will not lose any lighting during the daytime but I will be subjected to lighting from the building in the evenings and possibly during the night.</p> <p>ART GALLERY: A private art gallery next door to the Gagosian Art Gallery, that extends the construction times of this development considerably. This is not sensitive to the local community and brings no benefits to the area, yet will take many months to excavate.</p> <p>CONSTRUCTION: 18 months for a building of this size suggest the technical nature and that this is not just a "simple" planning application but a complex one.</p> <p>DEVELOPER "CONSULTATION": At the developer's exhibition, the mock-ups did not show all the elevations, the mock ups I did see suggested that the Derby Lodge Courtyard was a busy communal place with people walking through it, when in fact the courtyard is closed to residents and the public and very, very quiet and peaceful.</p> <p>The leaflets handed out by the developers suggested that the site was very rundown. The site was a working Mirror factory/workshop until earlier this year (2016) and far from just a storage area. The developers emphasised this "run down" nature by including photos of the rear of the neighbouring property (149 King's Cross Road) who has left hoarding and rubbish outside, it was not the rear of the property at all.</p> <p>PLAN ERRORS: There is an error on the location map that does not match what the developer has submitted. Of real concern is the location map shows that the Derby Lodge Boiler House will also be</p>

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					demolished and residents will lose all their hot water and heating.
					Plans have several errors and do not show all local property windows and skylights, the representations submitted does not represent accurately the surrounding buildings and is misleading!!!
					The developer (Clemente) who owns the property did refer to me that this is his "pet project" that allowed him to create his "dream property", he did not seem too aware of the sensitive lettings of Derby Lodge or its" community, his main objective was to create something that he thought looked pretty. This included using black bricks even though it was not in keeping with the existing or surrounding buildings.
					As a resident who has lived here for 15 years, I would prefer that the building keep its original size and shape and not be any larger. I would also prefer no opening windows or balconies, or any entrance into the courtyard where employees can disturb my home.

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