

## OFFICERS' REPORT

### 1. SITE

- 1.1 The application site is a vacant parcel of land, predominantly flat in character, located to the rear of the Eastman Dental Hospital, and is accessed from Langton Close at its southern end. The site is currently used for access for medical deliveries, and informal parking related to the Dental Hospital. The site has previously been in use as a builder's yard and to provide additional accommodation relating to the Eastman Dental Hospital. Existing structures on the site including bicycle sheds, an entrance gateway, an access ramp to the existing halls, and existing and disused hospital stores will be removed.
- 1.2 The site is set in an area that can be described as predominantly of a mixed usage. To the north of the application site is located the residential area of Seddon Street, Cubitt Street, and Fleet Square, formed by a mixture of 2 and 3 storey properties. To the east of the site are a series of low-level light industrial units accessed from Pakenham Street and Wren Street. To the south of the site is the existing vehicular access to the site and an existing Student Hall of Residence occupied by UCL, and also a vista through to St. Andrew's Gardens. To the west of the site is Eastman Dental School/Hospital and beyond that, Grays Inn Road.
- 1.3 The site is not located within a conservation area but adjoins the Bloomsbury Conservation Area in its southwestern corner adjacent to St. Andrew's Gardens.

### 2. THE PROPOSAL

#### Original

- 2.1 The application submitted is for a student hall of residence to provide self-catering accommodation for UCL. The building proposed is arranged on a 'horseshoe' shape with the internal courtyard facing south. The height of the proposed building will vary between five and eight storeys, with the eight-storey element located towards the eastern side of the site, adjacent to the low-level light industrial units.
- 2.2 The accommodation will provide 211 bedrooms, to be arranged in 32 cluster flats. The size and nature of the flats will vary with accommodation being provided in a mixture of maisonettes (for 6 students each), 4 storey houses (for 6 students each) and more traditional flats (for 5 or 8 students each). Each bedroom within the halls will provide an en-suite shower room, and each flat will possess its own communal kitchen/dining area. In addition, two of the ground floor bedrooms are designed to accommodate wheelchair access. Further communal facilities including management, security and general offices, common rooms and laundry rooms will be made available for students within the adjacent existing hall of residence.
- 2.3 There are to be 8 parking spaces provided on the site, four of which will be for operational use, and the remaining four spaces are to be reserved for disabled use (2 of which will be for the existing adjacent hall of residence). There will not be provided any student parking on the site, or parking for the Eastman Dental Hospital, however there will be continued access to the hospital made

8. To ensure the availability of the facilities in accordance with the approved scheme in order to ensure compliance with the requirements of policy TR23 of the London Borough of Camden Unitary Development Plan 2000.
9. To ensure the availability of the facilities in accordance with the approved scheme in order to ensure compliance with the requirements of policy TR22 of the London Borough of Camden Unitary Development Plan 2000.
10. In order to ensure that the proposed development site, satisfies the requirements of Policy EN10 of the London Borough of Camden Unitary Development Plan 2000, in respect of land or site known to be, or suspected of contamination.

**Informative**

1. The use hereby approved is for hostel accommodation for students only, and if the Halls of Residence are to be used outside of term-time for potential conference or other short-term residential use, then it may be necessary to obtain planning permission for such subsidiary uses.

- a) The applicant has submitted a programme of ground investigation for the presence of soil and groundwater contamination and landfill gas for approval by the Council.

and

- b) The investigation has been carried out in accordance with the approved details and the results and remediation measures (if necessary) have been submitted to and approved in writing by the Council. All approved remediation measures shall be strictly in accordance with the approved details.

### **Reasons**

1. In granting this permission the Council has had regard to the special circumstances of the case and wishes to have the opportunity of exercising control over any subsequent use in the event of the Higher Education Institution vacating the premises. The Council is particularly concerned to control any possible variation of the use to hotel accommodation, and to ensure compliance with the requirements of policies HG21 & HG22 of the London Borough of Camden Unitary Development Plan 2000.
2. To ensure that the Council may be satisfied with the external appearance of the building in accordance with the requirements of policies EN1 and EN13 of the London Borough of Camden Unitary Development Plan 2000.
3. To ensure that the Council may be satisfied with the external appearance of the building in accordance with the requirements of policies EN1 and EN13 of the London Borough of Camden Unitary Development Plan 2000.
4. To ensure that the Council may be satisfied that the development will not have an adverse effect on existing trees and in order to maintain the character and amenities of the area in accordance with the requirements of policies EN61 of the London Borough of Camden Unitary Development Plan 2000.
5. To ensure the preservation of the amenity value of the trees in question, in accordance with the requirements of policies EN61 of the London Borough of Camden Unitary Development Plan 2000.
6. To ensure that the landscaping is carried out within a reasonable period and to maintain a satisfactory standard of visual amenity in the scheme in accordance with the requirements of policies EN15 of the London Borough of Camden Unitary Development Plan 2000.
7. To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy RE2 of the London Borough of Camden Unitary Development Plan 2000.

3. Sample panels of the facing brickwork and external finishes showing the proposed colour, texture, face-bond and pointing shall be provided on site and approved by the Council before the relevant parts of the works are commenced and the sample panels shall be retained on site until the work has been completed. (CD09 varied)
4. During the construction period the trees to be retained on site, shall be protected by a chestnut paling fence, stoutly secured to stakes at a minimum distance as set down in BS5837: 1991, and no materials are to be stored within this protected zone at any time.
5. No development shall take place until full details of hard and soft landscaping and means of enclosure of all unbuilt, open areas have been submitted to and approved by the Council, and be implemented thereafter. (CE02 varied)
6. All hard and soft landscaping works shall be carried out to a reasonable standard in accordance with the approved landscape details, prior to the occupation for the permitted use of the development or any phase of the development, whichever is the sooner. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the Council gives written consent to any variation. (CE04)
7. Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement ( $L_{A90}$ ), expressed in dB(A) when all plant/equipment are in operation. Where it is anticipated that any plant/equipment will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps) special attention should be given to reducing the noise levels from that piece of plant/equipment at any sensitive façade to at least 10dB(A) below the  $L_{A90}$ , expressed in dB(A). Before the use commences all plant and machinery shall be sound attenuated and isolated from the structure to prevent the transmission of noise and or vibration to any other parts of the building and adjoining premises.
8. The areas shown on the approved drawings as parking, access, loading and manoeuvring areas shall be provided and retained, and shall not be used other than for the purposes shown. (CH04)
9. The development hereby permitted shall not be occupied until the provision for secure cycle parking/storage has been made, in accordance with the approved plans. The cycle parking/storage shall be maintained for this purpose at all times thereafter.
10. No development shall take place until:

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- 6.29 It is important that new developments provide adequate provision for the handling of waste products. It is intended that the existing area set aside for the collection of waste products from the adjacent UCL Hall of Residence at the entrance to the application site, will be extended to allow for the collection of rubbish from the new halls.
- 6.30 The application includes plans for the improvement and retention of the Hospital Chemical Store adjacent to the northern boundary on the footprint of the existing chemical store. The store is to be located within a bunded, secure compound and will not cause any adverse impact on the amenities of the area, and will indeed improve upon the arrangements for the storage of these materials that currently exists. This will necessitate the need for continued access by hospital vehicles to the site, in addition to the occasional requirement for deliveries to the west elevation of the hospital building.

## 7. CONCLUSION

- 7.1 The proposed halls of residence are to replace the existing hostel accommodation at the Rockefeller Nurses Home on Huntly Street, and the principle of the development of the site in this manner is considered to be acceptable and in line with the policies of the UDP. The bulk, massing and detailed design of the buildings are considered to be in keeping with the character and appearance of the area, and relate acceptably to the adjacent uses to the site. It is therefore considered that subject to conditions, the proposal is acceptable.

## 7.2 LEGAL COMMENTS

- 7.3 Members are referred to the note from the Legal Division at the start of the Agenda.

## 8. RECOMMENDATION: Grant Full Planning Permission subject to Conditions (FPC)

### Conditions

1. The use hereby permitted shall be used only for the purposes of providing hostel accommodation for students of University College London or where agreed in writing by the Council, for students attending any other educational institution approved by the Department of Education and Skills. The building shall be used for no other purpose, including any other hostel use as set out in the Schedule of the Town and Country Planning (Use Classes) Order, 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order.
2. The details of the elevations and facing materials to be used on the building shall not be otherwise than as shall have been submitted to and approved by the Council before any work on the site is commenced. (CD01)

located on the roof of the buildings. It is considered that the application of conditions relating to sound attenuation/isolation and noise levels will be sufficient to control the performance and output from the units.

- 6.24 The potential for noise and disturbance from construction activity is another area for concern that is covered in the UDP. **Policy EN7** states that noise and disturbance caused as a result of the construction process needs to be minimised to protect amenity and the environment as much as possible. A number of recommendations have been made regarding the carrying out of construction activities on the site, and these are contained within a Council handbook that is recommended to the applicants in an informative.

#### **Accessibility, Cycling, and Parking Standards**

- 6.25 It is intended to provide 8 parking bays in connection with the proposed development, of which 4 are to be disabled bays. It is expected that the Council will normally apply the parking standards to all new-build residential development so that there are sufficient spaces provided, including spaces to accommodate the needs of people with disabilities. The site is however within the Central London Area as defined by the UDP, and it is accepted that in this situation that the amount of parking provided on the site should be constrained. The additional 4 spaces provided on site are for university and site staff and will not be made available for use for residents of the Halls of Residence. It is therefore considered that the provisions of **Policy TR17** have been adhered to.

- 6.26 **Policy TR22** requires the Council to expand, develop, improve, and promote cycling within the borough. It is expected that developers, where it is appropriate for the development, should provide adequate facilities for cycle movement and parking. The standards set out in DS8 of the UDP also need to be adhered to ensure that there is sufficient parking provided for cycles, the standard in this instance being 1 space for every 20 units. In fact the development will provide a total of 88 secure cycle spaces on the site (30 of these are a re-provision for the adjacent halls), which considerably exceeds the required standard.

#### **Servicing**

- 6.27 Access will be required to the site on an occasional basis for servicing of both the new halls of residence and the hospital. It has been confirmed that the building layout will allow sufficient movement by service vehicles around the site, and will also keep pedestrian and vehicular access to the site as separate as possible

#### **Contaminated Land**

- 6.28 It has been necessary to consider the former uses and history of the site and whether there are any issues relating to contaminated land as a result of these uses. Because of the sites former incarnations as a builders and timber yard, it is considered necessary to investigate the site for possible contamination, and to allow consideration as to whether any remedial measures are required. Therefore a condition has been included requiring the preparation of a programme of ground investigation for the presence of soil and groundwater contamination, and landfill gas, to comply with the requirements of **Policy EN10**.

#### **Handling of Waste and Hazardous Materials**

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- 6.19 The courtyard area to be provided as a feature of the layout is proposed to be landscaped to a high standard, with predominantly hard surfaces and planting limited to a row of fruit trees along each side. Around the external side of the buildings there is far more scope for landscaping. A commitment has been made to create a green perimeter around the buildings through the use of soft green landscaping, and it is also intended to plant some additional trees around the site, including two further Planes. A condition is included with regards the need for a detailed planting and landscaping scheme to be approved. The existing mature Plane trees on the eastern boundary are to be retained
- 6.20 The Council has recognised the need for new buildings to demonstrate that they have adopted an energy efficient approach in development. **Policy EN15** states that the Council will welcome proposals for the development of renewable energy sources and the use and development of more efficient forms of energy. Consideration has been given to these issues and the scheme includes a combined heat and power system, a system for heat recovery, and rainwater harvesting to provide water to service the five-storey block. These systems have been integrated as part of the design of the scheme.

#### **Strategic Views and Impact on the adjacent Conservation Area**

- 6.21 The application site is located adjacent to a Conservation Area and the taller elements of the building will be clearly visible from within the Conservation Area. It is necessary to assess whether or not there will be demonstrable harm caused to the character and appearance of the Conservation Area as a result of the proposed development. Whilst the eight-storey element of the development is higher than other buildings within the area, in views from the Conservation Area it will be difficult to see the proposed building, being located as it is behind the bulk of the Eastman Dental Hospital. There will be a vista of the proposed development available across Calthorpe Gardens to the North-West, though it is considered that this will not have a significant impact on the character or appearance of the Conservation Area. The development therefore is not contrary to **Policy EN37**.
- 6.22 The application site falls within a strategic viewing corridor affecting views of St. Paul's Cathedral from both Parliament Hill and Kenwood House. **Policies EN43 and EN44** specifically consider the impact of development within the strategic views and viewing corridors, and sets a development plane below which development will not have an impact on the views. Despite the height of the eight-storey element of the proposal, the development does not exceed the prescribed viewing plane, and therefore will not cause an obstruction to the strategic view or viewing corridor.
- #### **Potential for Noise and Disturbance**
- 6.23 There are two main areas of consideration regarding the potential for noise and disturbance that need to be taken into account. The impact of, and potential disturbance by, any proposed plant and machinery on the development is an important consideration. The proximity of adjacent residential uses to the north and the east ensures that the Council needs to be satisfied that any such equipment can be operated without causing injury to local amenity in terms of their appearance, location, noise and smell. This guidance is in line with the provisions of **Policy EN6**. The majority of the proposed plant for the development is to be located within the basement, though it will be necessary for there to be some air handling heat recovery units, and extract fans to be

potential for overlooking of adjacent residential uses. The northern elevation is the most sensitive being only 20 metres from the residential properties in Seddon Street. The only windows to habitable rooms that will overlook directly to the north are on the 1<sup>st</sup> – 3<sup>rd</sup> floors of the northwest Corner House, and the roof lights on the recessed fourth floor, and it is considered that this will not have an unacceptable impact on privacy or the potential for overlooking. It is considered that the orientation of the 8-storey block and subsequent distance to other residential properties in Cubitt Street (in excess of 40 metres distant) is such that there will not be any significant issues of loss of privacy or overlooking.

- 6.14 There are no real concerns with regards overlooking of the existing Eastman Dental Hospital, as the hospital is predominantly a teaching and research institute and the rooms facing the applications site are predominantly in use as laboratories, and therefore are not considered as habitable rooms.
- 6.15 It is considered that the proposed development does not fall contrary to the provisions of either **Policies RE2** or **EN19** of the UDP, with regards to the impact on residential amenities of both adjacent properties and the area as a whole.

#### **Design of Development and Environmental Impact**

- 6.16 The design of the proposed development has attempted to take into account the differing types of accommodation within the development. The materials have been used to help to differentiate between the flats, maisonettes and houses within the development. The treatment of the courtyard area is different again with a recessed ground floor allowing for the creation of a colonnaded walkway, and bay windows and front doors opening on to the courtyard. It is intended to also differentiate between the lower and higher blocks by using brick on the five-storey element, and an oxidised copper on the higher eight-storey block. This use of copper and metal windows on the eight-storey block is considered to represent a more lightweight approach in terms of its appearance, and in addition it is also a low maintenance cladding material, which is largely recycled.
- 6.17 The specific materials to be used in the development include the use of metal windows throughout the buildings, with patented glass for the larger areas of glazing. A smooth cream or buff brick is proposed for the 5-storey elements of the development, whilst as mentioned above, oxidised copper is to be used for the eight-storey wing. Whilst it is proposed to condition that samples and details of the materials to be used in the building be agreed prior to development commencing, it is considered that the materials thus far proposed are acceptable. Indeed, in terms of detailed design and the use of materials, the proposed scheme is considered to comply with **Policies EN13** and **EN14** of the UDP.
- 6.18 It is important that the needs of people with disabilities are taken into account in the design of any new development, and **Policies RE3** and **HG17** specifically requires that where practicable and reasonable, buildings be designed to facilitate access for, and use by, people with disabilities. Two study bedrooms have been specifically designed to allow use by people with disabilities (wheelchair users), and linked to this is the provision of two disabled parking bays.



students who are very much situated at the affordable end of the housing market, and it is therefore considered that the provision of the proposed accommodation satisfies not only policy HG15, but also the requirements of **Policy HG11**, which specifically expects that at least 25% of any new residential development of 15 units or more, be affordable.

- 6.8 The proposed development, being intended, as it is to provide 100% residential accommodation, is considered as the exception to the requirements of **Policy RE5**. This policy requires proposals to incorporate a mix of uses to fit with the well-established mixed-use character within the borough, though in this instance secondary uses on the site would not be considered appropriate with regard to the residential nature of the development.
- 6.9 It is considered that the proposed development of the site for residential accommodation is in keeping with the Housing and use policies of the UDP and that the proposal accords with the provisions thereof.

#### **Residential Amenity and Environment**

- 6.10 The proposed development pays regard to the context of Langton Close and the surrounding area when considering the bulk, scale, height, and orientation of the various elements of the proposal. The development acknowledges the mix of types and scales of development in the vicinity, taking into account the variations between the scale of the dental hospital and existing hall of residence, the light industrial units, and adjacent residential development. The mix of five and eight storeys in the proposal is considered to fit in comfortably with the form of the area, though it is accepted that the eight-storey element is in excess of the height of much of the immediately surrounding buildings. However, it is not considered that this will present an overly, visually intrusive feature.
- 6.11 The general mass and bulk of the proposal is deliberately varied in order to not just achieve a design solution based around a central courtyard, but also to pay deference to adjacent uses in terms of minimising visual intrusion, loss of sunlight and daylight, and potential for loss of privacy. The positioning of the eight storey block has been specifically chosen in order to minimise the potential impact of loss of sunlight to adjacent residential properties, with buildings in Cubitt Street some 45 metres distant, and Seddon Street approximately 35 metres away. The five-storey block at the northern end of the site is closest to adjacent properties being approximately 20 metres distant, though the top floor has been recessed by 1 metre.
- 6.12 A report relating to daylight and sunlight levels was submitted to accompany the application. The report suggests that the four units that will be most affected by the scheme will experience a reduction in the level of sunlight and daylight that is currently experienced from across the currently un-developed site, though that this amount will not be materially significant. Even accepting the fact that the properties are sited on slightly lower ground, it is considered that this reduction in the amount of sunlight and daylight afforded to the adjacent properties is within acceptable parameters.
- 6.13 Issues of privacy and potential overlooking have again been considered carefully due to the context within which it has been necessary to work. Efforts have been made to ensure that the proposed development minimises the

## 6. ASSESSMENT

6.1 The principal considerations material to the determination of this application are summarised as follows.

### **Use of the Site.**

6.2 It is proposed to provide a Student Hall of Residence for University College, London (UCL). There is a general presumption under **Policy CL4** to guide proposals for the expansion of the University of London and associated Institutions to sites within the University Precinct. The application site is located some way to the east of the university precinct and as such the proposal would appear to sit contrary to the intentions of the policy. However, it should be noted that the application is to essentially provide replacement accommodation for an existing, sub-standard hostel sited in Huntley Street (also outside of the University Precinct), which is the subject of an application for a change of use to an educational/teaching use (Class D1). Therefore, the context of the application changes to essentially the provision of replacement hostel accommodation rather than additional accommodation.

6.3 **Policy HG1** seeks to ensure that there is no net loss of residential floorspace within the borough. Providing as it does replacement residential accommodation, the proposal ensures that there will be no overall net loss in the provision of residential floorspace within the Borough.

6.4 The application site has been in use most recently as a car park serving predominantly the adjacent Eastman Dental Hospital, with some parking available for the existing student hostel on Langton Close, and as such the site can best be described as under-used. Under **Policy HG8**, efforts are made to guide development to ensure that vacant, derelict, or under-used sites are where suitable, and subject to the operation of other environment policies and development standards, used to increase the amount of land in residential use.

6.5 Whilst the proposed development does not fall within residential use class C3 (being regarded as *sui generis* in character), the proposal does provide for a significant level of residential floorspace, albeit in the form of a student hostel. The provision of a student hostel is considered to be appropriate in this location being situated immediately adjacent to an existing Hall of Residence. The proposal would therefore appear to satisfy the requirements of the policy.

6.6 **Policy HG22** deals specifically with the issues of new hostel accommodation. It is accepted that increased hostel provision helps to ease pressure on the private housing market, particularly the cheaper end, though it is considered appropriate in many circumstances to impose a condition on the grant of planning permission to restrict the occupation to that of a name organisation, in this case University College London.

6.7 The proposal will also satisfy the requirements of **Policy HG15**, which seeks to ensure that there is the provision of a variety of housing, in terms of size and type, to meet the physical and economic needs of the borough's population, including housing for those groups who experience particular difficulties in finding appropriate accommodation. These special needs groups include

## Adjoining Occupiers

	Original
<i>Number of Letters Sent</i>	26
<i>Number of responses Received</i>	2
<i>Number in Support</i>	0
<i>Number of Objections</i>	2

- 4.4 Site notices were posted up on the site on 20<sup>th</sup> August 2001. Two letters of objection have been received to the proposed development from local residents of the adjacent Fleet Square, immediately to the north of the site. Concerns have been expressed regarding the impact that the development will have on the daylight and sunlight available to the properties. The residents also consider that due to the bulk and proximity of the proposed halls to the boundary, that there will be a significant decrease in the standard of living available to residents. Concerns have also been raised regarding the architectural language, materials and finishes proposed for the new buildings.

## 5. POLICIES

### Camden Unitary Development Plan 2000

- 5.1 RE2 – Residential amenity and environment  
RE3 – Access for all  
RE5 – Mixed Use Development  
EN1 – General Environmental Protection and Improvement  
EN6 – Disturbance from Plant and Machinery  
EN7 – Noise and Disturbance during Construction Activity  
EN10 – Contaminated Land  
EN12 – Use of Resources  
EN13 – Design of New Development  
EN14 – Setting of New Development  
EN15 – Landscaping  
EN19 – Amenity for Occupiers and Neighbours  
EN37 – Proposals outside conservation areas  
EN43 – Strategic Views  
EN44 – Viewing Corridor  
TR17 – Residential Parking Standards  
TR22 – Cycling  
TR23 – Movement of Goods – Facilities and Amenity  
DS8 – Car Parking Standards  
DS10 – Cycle Parking Standards  
HG1 – Loss of Residential Floorspace  
HG8 – Increasing the Amount of Residential Accommodation  
HG11 – Affordable Housing  
HG14 – Mobility and Wheelchair Housing  
HG15 – Ensuring the Provision of a Range of Housing  
HG17 – Mobility and Wheelchair Housing  
HG22 – New Hostel Accommodation  
PU3 – Waste Management  
PU5 – Handling of Waste  
PU6 – Hazardous Installations and Hazardous Waste  
CL4 – Expansion of the University of London

available to the reconstructed secure chemical and oxygen store in the north west corner of the site. It is also intended to provide 88 spaces for the parking of bicycles in secure storage accommodation, predominantly on the eastern boundary.

- 2.4 The scheme will also provide landscaping for the site including the provision of a green perimeter adjacent to the buildings, the planting of additional trees on the site, and the retention of two existing mature plane trees. It is intended that the courtyard created by the arrangement of the buildings will be hard-landscaped, though will provide two rows of flowering cherry trees. It is designed to allow the use of the area as external communal amenity space.
- 2.5 This application is linked directly with another site in the borough, the Rockefeller Nurses Home. The accommodation to be provided on the Langton Close site is to be considered as a direct replacement to offset the 248 bedrooms (of which only 138 currently occupiable) that will be lost as a result of redevelopment occurring on that site by UCL. The new halls of residence will enhance the standard of accommodation currently available.

### 3. RELEVANT HISTORY

- 3.1 The application site has over the years had a number of uses including as open ground to a school, as a builders/timber yard, and has also been developed in connection with the Hospital. Since the demolition of these buildings, the site has been used for parking related to the Hospital, though it is not clear whether or not this was the lawful use for the site. There has not been any recent history specific to the application site.

### 4. CONSULTATIONS

#### Statutory Consultees

- 4.1 **Transport for London** has provided comments regarding the proposed development. The minimal amount of car parking proposed has been welcomed, and it is considered that the provision of secure and covered cycle parking facilities assists in encouraging cycling as an alternative mode of transport to the private car.

#### Conservation Area Advisory Committee

- 4.2 No comments have been received from the **Bloomsbury Conservation Area Advisory Committee**.

#### Local Groups

- 4.3 **The Camden Civic Society** accept that the site of the proposed development is not a sensitive one, but feel it necessary to object very strongly to the proposed building on the basis of its bulk and height. They consider that the development will dominate the surrounding area with the predominant height of buildings being considerably lower than the proposal. The Civic Society also considers that the housing to the north will experience a loss of light as it is situated on lower ground.