

I, Stephen Daldry CBE, am writing to object the development of Rear Of 1-3, Britannia Street, London, WC1X 9BN (ref: 2016/6356/P) in its current form. The development will cause considerable harm the use and enjoyment of my property 5 Britannia Street, with considerable regard to massive loss of light. The objections, and suggested solutions are listed below.

*Please note that while this objection share many paragraphs with that of 3 Britannia Street my direct neighbour, as we worked together on common issues affecting us both and how to solve them, this is a separate comment/objection with many separate issues particularly in reference to **the massive and significant loss of light my property will suffer.***

I also wish to highlight the poor treatment of residents and intransigence on behalf of the developers in reference to our previous comments on the development and lack of communication and engagement with the community.

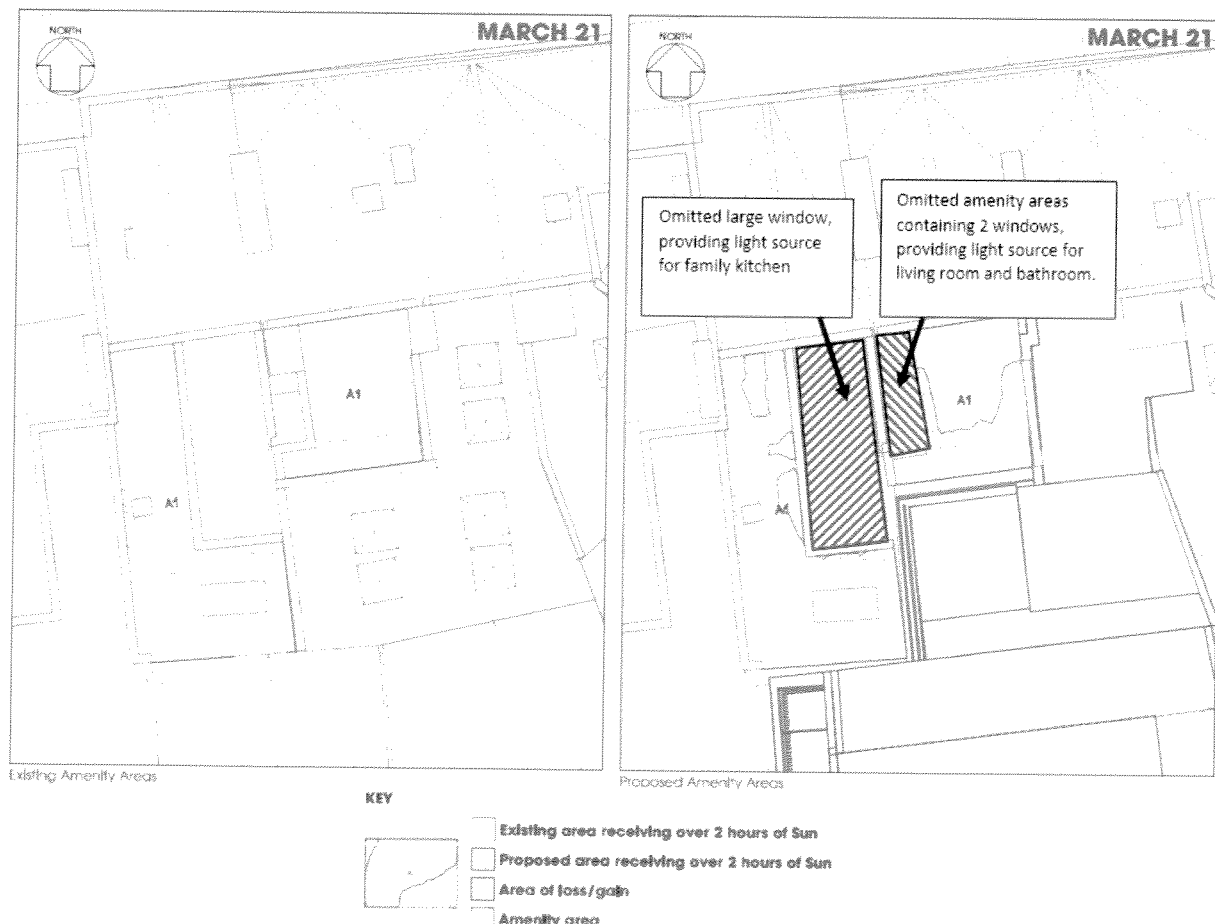
1) Loss of Light and Negligent Inaccuracies of Daylight and Sunlight Report:

- My primary objection to the proposed developed is the massive loss of light my property will suffer both to inside (through windows) and to outside amenities. Given the massive detrimental effect this will have on my use of the property I find it highly disappointing and troubling with respect to the lack of diligence undertaken in the planning that the light report does include my property's large window (roughly 12ft by 6ft), which is also the window closest to the development and stands suffer the greatest reduction in light.

Inaccuracies within the Daylight and Sunlight Report

- The skylight window of my kitchen is the primary source of light for the kitchen and only source of direct sunlight for the room. The Daylight and Sun report completely omits this very large (12ft by 6ft) and easily observable window, even though it is easily observable and will be the most affected window. There is no conceivable way that the author of the Daylight and Sunlight Report could have accidentally missed this window, indeed it is discounted from the amenity area, suggesting they knew about its existence but left it out the report.

Exhibit 1.1 from (see p43 on Daylight and Sunlight Report)



- These among of numerous errors in the report, suggesting that the report lacks the necessary diligence and detail required for submission and questions validity and bias of the report.
- Below show some omitted windows:



Omitted Window of 5 Britannia Street



Omitted Windows of 159-163 Kings Cross Road

- The report **also omits or skylight windows on properties for 159 to 163 (p30 of lighting report)** are also missing, and these windows are likely the only source of daylight for the below rooms.
- The amenity area for my property, 5 Britannia Street, will suffer massive light loss, if the development proceeds then only 9% of it will 2 hours of daylight. It is not unreasonable to assume that my kitchen window (that is not in the lighting report) would suffer a similar reduction in light, severely damaging light in an important family room and **falling well below BRE guidelines**.
- The report also incorrectly suggests that "It is conceivable that most amenity spaces are mainly used during the summer months." This is entirely incorrect as the amenity is in constant use but in particularly heavy use in Spring and Summer. The frankly absurd assertion that we do not use our outdoor space during spring one more leads me to question the validity and independence of the report.

Loss of Light:

- Loss of light will be among the primary detrimental effects I will suffer should this development go ahead.
- According to Daylight and Sunlight Report it will reduce the proportion of my outdoor amenity that receives 2 hours on sunlight in spring (March 21st) to 9%, a reduction of 81% (Pr/Ex value of 0.19) from the previous value of 12.45 hours! Effectively it will render my outdoor space without sunlight for most of spring, making it cold and uninviting, destroying its utility as an outdoor space of enjoyment.

Floor Ref.	Amenity Ref.	Amenity Area	Lit Area Existing	Lit Area Proposed	Pr/Ex	Meets BRE Criteria
5 Britannia Street						
First	A1	Area m2 Percentage	25.92 48%	12.45 9%	2.42 0.19	NO
3 Britannia Street						
First	A1	Area m2 Percentage	14.5 75%	10.91 52%	7.5 0.69	YES

- I expect daylight to my kitchen to be restricted in the same way, though it has been left off the report. This will severely restrict sunlight which upon which the most used room in my house relies.
- The development, **due to its excessive height**, will 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 though affect my property perhaps the curtail the ability to use and enjoy affected amenities and kitchen.
- 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 my bathroom and kitchen (the latter is left off lighting report may also not be considered in this basement by developer). This is less than the 18m required by BRE and Camden Planning Guidelines.
- **The new development proposals also include a terrace with three large entry doors. Users of this terrace will be directly over looking my outdoor amenity area, be able to look directly into my kitchen, bedroom and bathroom from a distance of considerably less than 18m.**
- **As a results our privacy will be affect negatively, preventing me and my family from enjoying reasonable privacy.**
- 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"**.

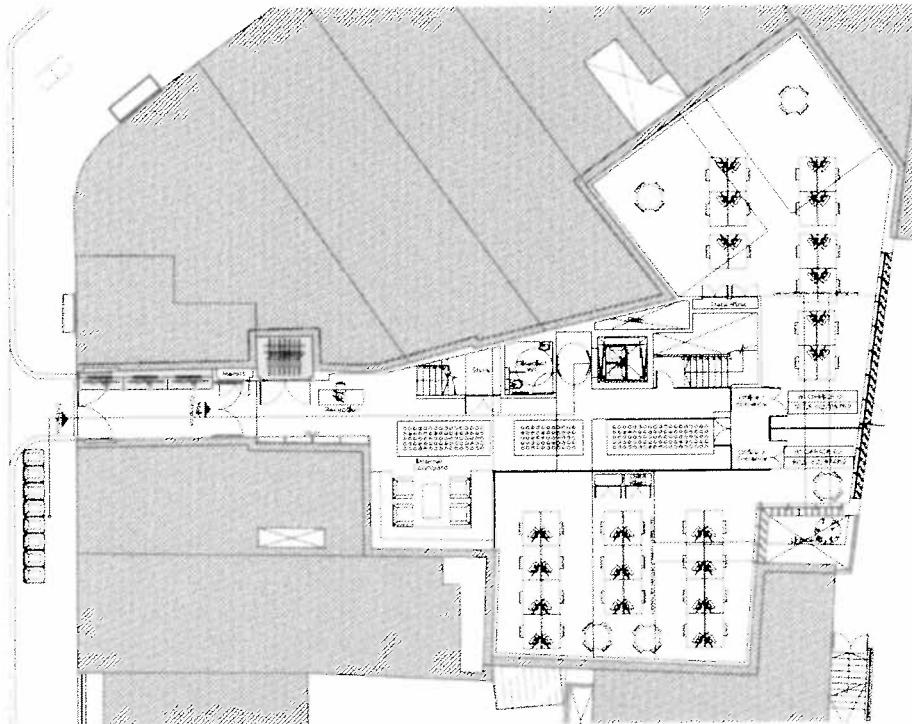
- Policy DP26 still requires measures to be taken to ensure that the privacy of residential occupants is maintained. The current development does not maintain our privacy but instead reduces it. We have no wish for the occupants of our property.

Suggested Mitigations:

- **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.
- **Removal of Terrace:** The terrace, with its overlooking position of my property is completely incompatible with my right to privacy.
- **Removal of large number of windows and installation of privacy solutions:** There are large number of windows that look directly into properties and are less than the required 18m, these should be removed from plans. Addental, the developers architect should suggest solutions that will prevent privacy breaches, little or not effort appears to have been expended in this area.

3) Waste Management Strategy will directly affect 5 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.



- While the DAS suggests that these will be placed on the 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 my property and the neighbouring 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.
- 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.

Suggested Mitigations:

- **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 5.00pm or earlier and had very light traffic and footfall with little or no discernible noise effect on us as 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.

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 my 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.

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 **revised plan has not taken concerns of residents into account and will actually make light pollution worse**. As the addition of massive central skylights and the removal of louvres mean light will flow uninhibited into the shared area.
- In my, 5 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 skylights:** This would serve to cut light pollution significantly.
- **Removal of large numbers of windows:** This would serve to cut light pollution significantly.
- **Removal of Gallery in basement that will decrease night-time use of the building.**

7) Detrimental Change of Character of Conservation Area:

- Our property, 5 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, thus, would destroy the unique characteristics of the area. Two aspects of the building are significantly detriment to the charter and stand out against the existing buildings: the 3 large glass door leading to the terrace and the hyper modern aspect of the windows especially stand out against the current environment; for instance current residents must, when installing new windows, keep the same design aesthetics. Aesthetics the proposed development makes no concessions to.
- 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 terrace doors and ensuring windows are of similar design to existing area.**

8) Lack of Affordable housing in development:

- The area has a high proportion of affordable housing and the developers are neglecting their obligation to create affordable housing that would benefit the community.
- The Planning statement says that "the 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."
- 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.

Suggested Mitigations:

- **Build required affordable housing.**