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Flat 17, 1-10 Summers Street
London
EC1R 5BD

6 June 2018

Ms. Laura Hazelton
Senior Planning Officer
London Borough of Camden

(By email only)

Dear Ms. Hazelton

Planning application 2018/1325/P

I wish to object in the strongest possible terms to the application to build a two storey roof extension at 144A Clerkenwell Road as part of the above planning application.

I believe the proposed scheme would have a severely negative impact on the current amenity of my property in a number of ways, each of which individually are in breach of the Camden Planning Guidance issued in March 2018. I have set out the specifics below.

Furthermore, I believe that the proposed scheme is a classic example of over-development, with practically zero concern for the impact of the design on residents of 1-10 Summers Street. While I believe the whole concept of a 2 storey extension to the current building to be unacceptable and inconsistent with Camden's planning guidance, there are a number of ways in which the proposed scheme impacts unnecessarily heavily on my amenity value, to limited marginal benefit to the developer.

I believe this scheme represents a thoughtless and careless approach to development, focusing solely on the creation of maximum financial value to an owner not resident in the borough, placing no value on the concerns and interests of a large building of long-time Camden residents.

My specific issues with the proposed scheme are as follows:

1. 80-100% reduction in light to all windows in both my bedrooms

My property, Flat 17, has only 3 windows to the rear aspect, providing all of the light into both of my bedrooms. These windows are referred to as W30, W33 and W36 on the Daylight, Sunlight and Overshadowing Report dated 19 December 2017 prepared by Hilson Moran. W30 and W33 are to one bedroom, W36 is into the other.

The loss of daylight to these bedrooms as a consequence of the proposed scheme can only be described as catastrophic.

Using the data from the Hilson Moran report, these bedrooms, representing 2/3 of the habitable rooms in my property, would see an 80-100% reduction in light. Please see the specifics below:

Window	Current VSC	Proposed VSC	Reduction (%)
W30	22.1	7.02	68.24%
W33	19.9	2.44	87.74%
W36	9.56	2.1	78.03%

Window	Current APSH	Proposed APSH	Reduction (%)
W30	44	10	77.27%
W33	38	4	89.47%
W36	24	0	100.00%

Window	Current WPSH	Proposed WPSH	Reduction (%)
W30	15	2	86.67%
W33	13	0	100.00%
W36	7	0	100.00%

This means that from being fairly light and sunny rooms currently, if the proposed scheme were to go ahead, the bedroom whose sole source of natural light is W36 will lose 100% of its annual sunlight hours, and the other bedroom will lose 80-90% of its annual sunlight hours and 90-100% of its winter sunlight. These rooms will become dark and feel like caves rather than habitable rooms.

I believe that the proposed development does not take account of Camden's Local Plan Policy A1 which states:

"To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011)."

I also believe the proposed development does not respect and take account of Camden Council's specific guidance in the pre-application advice report, which states (emphasis added):

"There is concern about the impact of the development on the amenity of occupants of 1-10 Summers Street in terms of outlook and daylight. Although a right to light assessment has informed the pre-app proposals, this issue would need to be fully assessed by a daylight/sunlight report to check the development would comply with BREEAM standards. The proposed extension would sit just a few metres away from the south-facing windows of these apartments and is likely to have a significant impact on daylight, sunlight and outlook. No development would be found acceptable unless it was fully demonstrated that the works would not result in detrimental impacts upon these neighbouring residents."

The BREEAM standards require that there be a ratio change no greater than 0.8 (equivalent to a 20% reduction) in any of the light ratios referred to above. On this basis, the proposed development is hugely in breach of these standards, with reductions of at least 70% and up to 100% in the key ratios.

While in this letter I am generally confining my comments to my own property, I would note that this is not an isolated case - the proposed development will seriously impact many other Camden residents within 1-10 Summers Street in a similar manner.

I urge the council to take into account the huge impact that the proposed development will have on my quality of life and the value of my property, as well as the above-demonstrated non-compliance with the Camden Local Plan Policy A1, BREEAM standards for development and Camden Council's own pre-application guidance.

2. Overlooking of my bedrooms from both new office and residential space

My bedrooms are currently well screened from overlooking as a result of a number of measures specified as permanent conditions of the original planning permission granted to allow the first upward extension of 144A Clerkenwell Road in 1999 (see Condition 3 of permission PS9904079R2 and PS9904853).

Specifically, the area of offices facing the rear of my property does not currently overlook my bedrooms as:

- The current modest office space is set well back from the boundary of 144A Clerkenwell Road
- Tall bamboo screening is maintained in line with the permanent condition referred to above, visible in the photograph at the top of the next page
- Rough pebbles are maintained to prevent people from walking into that area of the roof in line with the permanent condition referred to above

The combination of these thoughtful measures, all specified by Camden Council in 1999, mean that my property generally and my bedrooms specifically are currently private and not overlooked by anyone.

Under the proposed scheme, both my bedrooms would be significantly overlooked by the following:

- New glass fronted offices on the 3rd floor of the proposed scheme, significantly nearer to the boundary of 144A Clerkenwell Road than the current modest structure, apparently as close as 5 metres from my bedroom windows, with no mitigation measures or screening visible in the proposal
- Accessible 3rd floor office roof terrace on the Summers Street side of the building where currently rough pebbles are used to prevent access – I cannot understand why this has been proposed given that all it will do is overlook people's bedrooms
- Coffee bar and terrace on 4th floor of the proposed scheme – these are social areas which will both encourage large number of workers to use them and both look down into my bedrooms from the floor above from a distance apparently as close as 5 metres

This overlooking and loss of privacy are in contravention of Camden Local Plan Policy A1 and the proposed scheme does not seem to have into account Section 2 of Camden's Planning Guidance or have been designed with any attempts to reduce or mitigate overlooking or minimize impact on the privacy of adjoining properties, indeed social areas have been created in the most sensitive locations.

Again, I note that mine is not the only property at 1-10 Summers Street which will be seriously affected by this issue.

3. Light and noise pollution

My property is currently relatively dark at night, as the lights are generally not left on in the modest meeting rooms situated on the roof of 144A Clerkenwell Road which are opposite my bedroom windows. However, on the other floors, the building is a terrible light polluter and my neighbours on lower floors suffer serious light pollution as demonstrated by the photo below (this was taken from my bedroom window at 12:30am on Saturday night so the office is unoccupied).



I am seriously concerned that if the proposed scheme is approved, and 2 more floors of accommodation are built on the roof of 144A Clerkenwell Road, that this serious light pollution will be extended upwards and affect my property as badly as it does those below.

The proposed scheme does not seem to have into account Section 4 of Camden's Planning Guidance to minimize the artificial light pollution impacting upon the most sensitive possible neighbours i.e. bedrooms in multiple residential properties.

I am also concerned about noise pollution - the new coffee bar and terrace proposed, in addition to the overlooking of my bedrooms, will also create noise at times of day and night when I would reasonably expect quiet enjoyment of my property.

4. Impact on outlook

Currently, the outlook from the rear of my property is a pleasant one – consisting of mainly visible sky since the modest meeting rooms on the roof of 144A Clerkenwell Road are well set back and screened by bamboo screening (as visible in the photo above).

The proposed scheme would replace this sky view with one of several bare walls, within less than 2 metres of my bedroom windows – bare walls because even this developer would not propose windows so close to my bedrooms.

5. Overbearing design

The proposed scheme seeks to maximize the floorspace of the development with no regard to the impact on adjoining buildings.

The most extreme example is the proposed 2 storey extension of the area shown on the next page. Filling in right up to the boundary not only increases the impact on light, outlook etc, it also fails to respect and incorporate the corner and existing walls of 1-10 Summers Street.



(I would also like to point out that the left hand drawing provided by the developers indicating windows on the side of rooms 25, 29 and the associated corridor in the current building is not accurate. These are currently solid walls, presumably to prevent overlooking.)

1-10 Summers Street is an important local building of high architectural quality, and the proposed scheme does not respect the architectural hierarchy between the two buildings or the views from and spaces between them, and does not sit sensitively in the context of the site.

If any extension of the current modest structure on the roof of 144A Clerkenwell Road is to be considered acceptable to Camden Council, I would hope that it would be significantly smaller and more architecturally sensitive than the proposed scheme.

In summary, the proposed scheme impacts unreasonably heavily on the amenity of my flat, for the following reasons:

- Catastrophic loss of light to both bedrooms in my property, reduction of 80-100%, in breach of BREEAM standards, Camden Planning Guidance and Camden Council's pre-application guidance
- Creation of multiple high traffic areas in close proximity to both my bedrooms which have a clear line of sight overlooking down into my property, in breach of Camden Planning Guidance and Camden Council's pre-application guidance
- Creation of significant light and noise pollution, through new high traffic areas likely to be used early and late in the day and night, again within just a few metres of both my bedrooms
- Creation of an unattractive 'cavern like' outlook of plain walls within less than 2 metres of my bedroom windows, in replacement of a pleasant outlook of mostly visible sky
- Poor architectural design, prioritizing maximum floorspace at the expense of neighbor amenity and respecting the existing lines of the buildings – in my view clear and insensitive over-development of the site

I repeat my objection to the proposed scheme in the strongest possible terms and urge Camden Council to protect the legitimate interests of myself and a building full of long-time Camden residents over those of a non-resident developer.

[Redacted signature]

Helier Paveley-Drage