

The London Borough of Camden
Planning Services
2nd Floor, 5 Pancras Square
C/o Town Hall, Judd Street
London WC1H 9JE

27th June 2018

Our Ref: KWM/Sanne

Dear Sirs

REPRESENTATIONS TO PLANNING APPLICATION 2018/1325/P - 144A CLERKENWELL ROAD, EC1R 5DF

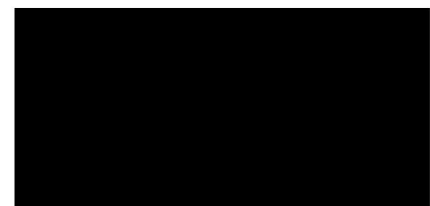
EXTENSION OF EXISTING THIRD FLOOR AND ERECTION OF NEW FOURTH FLOOR ABOVE TO PROVIDE A 1 X 2 BEDROOM RESIDENTIAL FLAT (C3 USE); ALTERATIONS TO BACK HILL ENTRANCE, ERECTION OF NEW EXTERNAL SPIRAL STAIRCASE TO NORTHERN LIGHTWELL AND REFURBISHMENT OF EXTSING OFFICE.

We write in respect of the above planning application. We act on behalf of the Freeholder of the premises at 150 -152 Clerkenwell Road and 2 Eyre Street Hill, London EC1R 5ET which directly adjoins the application site to the west. Whilst we support the principle of introducing higher quality office space to the area, we raise objections to the extension of the third floor, the additional 4th storey and to the proposed roof terrace. We consider that the scheme in its current form would cause unacceptable harm to the amenity and the functionality of the premises at no.150-152 Clerkenwell Road, in respect of the impact on its natural light levels, amenity, outlook and noise impact generated from the proposed terraces at third floor and roof level.

By way of background, the premises at 150-152 Clerkenwell Road are in D1 use (Non-residential Institution) and have recently been let on a 25-year lease to the Fordham University, a private American university based in New York. The University has relocated its London Campus from South Kensington to Clerkenwell and is due to open in August 2018. The campus comprises a contemporary student centre, including a separate learning resource centre as well as dedicated performance space for the Drama programme plus a further two floors with state of the art classrooms for the liberal arts and business programmes. A priority for such an educational establishment is the provision of a high-quality learning environment. This includes the necessity for classroom space and faculty offices to provide the requisite amount of natural light required for a satisfactory environment.

The proposed scheme would result in the natural light levels to a number of windows at no.150-152 falling short of the BRE guidelines. The scheme therefore results in compromised light levels to the classroom and office space. Additionally, the proximity of the terraces, the noise impact, overlooking and impact on outlook created by this use would also unduly impact on the affected rooms at 150-152.

**Investment Sales & Acquisitions
Office, Industrial & Retail Agency
Property Management
Building Consultancy
Lease Advisory
Valuation & Expert Witness**



Accordingly, we raise objections in respect of the following:

1. The impact of the third and fourth floor extensions on daylight levels and the reduced amenity to the educational use due to reduced natural light and outlook; and
2. The impact of noise and overlooking from the proposed terraces.

Impact on the amenity of the educational use at 150-152 Clerkenwell Road

Standards of amenity are recognised as being major factors in the health and quality of life of the borough's residents, workers and visitors and fundamental to Camden's attractiveness and success. Policy is clear in that this protection is not limited to residential uses.

Local Plan Policy A1 *Managing the impact of development* protects the quality of life of occupiers and neighbours and resists development that causes unacceptable harm. Of particular relevance are the potential impacts relating to daylight levels, outlook and sense of enclosure and noise levels.

i. Daylight Levels

Planning application 2018/1325/P is supported by a *Daylight, Sunlight and Overshadowing Report*. Paragraph 2.2.2 of the BRE Guide recognises that non-domestic buildings including schools have a reasonable expectation of daylight. The assessment of daylight levels in the supporting report identifies that 3 of the windows on the second floor on the White Bear Yard elevation fall below BRE criteria.



Extract from Bing Maps

The attached document including layout plans from Fordham University London web site shows that the windows that fail are intended for the use as classrooms. The classrooms were located on the upper floors to maximise natural light levels and this has now been compromised. In addition, the



outlook for the students would be oppressive. Based on the unacceptable impact to the existing use we consider that the proposed third and fourth floor extensions is not appropriate in this location and, contrary to Local Plan Policy A1, causes unacceptable harm.

ii. Noise Levels and impact of the terrace

The application includes a roof terrace which appears to allow access across the entirety of the roof and a third floor terrace directly outside the classroom windows at no.150-152. Paragraph 123 of the NPPF provides the overall aims in terms of noise when determining planning applications. This being to *"Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from new development, including through the use of conditions"*

Local Plan Policy A4 *Noise and Vibration* requires development to have regard to Camden's Noise and Vibration thresholds and proposals are resisted where they are likely to generate unacceptable noise and vibration impacts.

Paragraph 6.90 of the Local Plan recognises noise sensitive developments as including housing, schools and hospitals as well as offices, workshops and open spaces.

The proposed roof terrace is directly opposite the classroom windows and appears to allow access across the full extent of it in very close proximity to rear windows at no.150 -152 which are openable. The Acoustic Planning Report submitted with the application does not include an assessment of the impact of the noise generated by roof top activity on the directly adjacent classrooms.

In addition, full access is shown across the smaller third floor terrace directly outside the classroom windows. In this regard we would seek further clarification on the noise impact of both the third floor terrace and roof terrace on the classrooms. The use of the building will have intensified as will the use of the terrace and this impact needs to be understood.

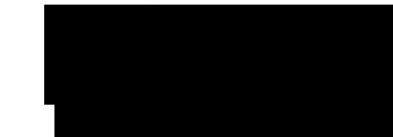
Notwithstanding this we consider that the roof terrace is contrary to the objectives of Local Plan Policy A4 and should be set back further from the rear of the White Bear Yard elevation of no.150-152 to avoid overlooking and disruption to this educational use.

Recommendations

Based on amenity grounds we consider that the additional extensions at third and fourth floor level across the entirety of the building is inappropriate by virtue of its impact on natural light levels, outlook and overall reduced amenity to the existing educational use.

We further consider that any terrace should be sufficiently set back to avoid issues of excessive noise or and privacy. We object to this application and consider it important that the extent of the fourth floor and the roof terrace should be revisited. We also request access be restricted to the third floor terrace outside the classroom windows.

Yours faithfully



K W Morgan FRICS
Director

