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Our Ref: RS/4849

28th June 2018

by post and email to:

Planning Department
London Borough of Camden
2nd Floor
5 Pancras Square
c/o Town Hall
Judd Street
London WC1H 9JE

For the attention of Mr Charles Thuairé

Dear Sirs

**15-17 Tavistock Place, London WC1H 9SH – Planning Application Ref. 2017/5914/P
Registered 31st October 2017 ‘Variation of condition to (approved plans) attached to planning
permission reference 2015/3406/P for demolition of existing shed buildings and erection of part single,
part two-storey, part three-storey medical research laboratory and higher education facility’**

Carlile Associates have been instructed by Christopher Donovan and Mika Ross-Southall [redacted]
[redacted] and Gary Buckland [redacted]
[redacted] and Paul Clement [redacted] to
oppose the above planning application. Our clients live in established residential accommodation that immediately
backs onto the development site. They will therefore be directly affected by the proposed demolition and
redevelopment of 15-17 Tavistock Place.

ALL OF OUR CLIENTS OBJECT to the proposed development set out in the current planning application. They
would have objected for similar reasons to the original application of 2015, had they been aware of the proposal.
They have only recently become aware of the current application submitted in October 2017, and note they did not
receive any letters advising them of either application. It is our understanding that Camden Council have recently
changed procedure whereby adjoining owners and neighbours to a development site are not informed by letter of
proposals. Instead applications are advertised by notices tied to lampposts adjacent to the site. It is noted that a
current notice in Cartwright Gardens has fallen to the ground.

General Comments

It is not immediately obvious to see the difference in the current application from that of 2015 for which
consent has been granted. However, the Design & Access Statement shows the changes, and drawings
have to be compared to see the differences proposed.

It is noted that there is less basement excavation proposed and less rooftop plant proposed. Instead of
plant at third floor level for which consent was granted in 2015, the current proposal seeks to vary that
consent for dry laboratory/research/write-up spaces and WC facilities. This will have new windows west
and east. The east windows will directly overlook residents in the first, second and third floor flats of 87-89
Marchmont Street.

While our clients do not object in principle to the redevelopment of the existing site, they do object to over-
development and overlooking, and the reduced sunlight and daylight and the sense of enclosure that the
proposed design will bring.

Planning Policy

Section 38 (6) of the Planning & Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The development plan in this instance is Camden Council's local plan/UDP 2017; Policies H3 Protecting Existing Homes, H6 Protecting Amenity, and H7 Design & Heritage. It is noted that the UDP of June 2006 under Section 2- Housing 15 stated that housing is the priority land use of the UDP.

The residential accommodation at 87-89 Marchmont Street falls in the Bloomsbury Conservation Area and Nos 81 to 89 Marchmont Street are in sub-area 13 and are described as making a positive contribution to that Conservation Area.

2.11 'Good design can increase density while protecting and enhancing the character of an area. All developments should be of excellent design quality and should sensitively consider the amenity of occupiers and neighbours, and particularly in Conservation Areas, the character, heritage and built form of its surroundings.'

3.16 – Policy H3 'Seeks to protect all housing floor space where people live long term The council will aim to ensure that existing housing continues to meet the needs of existing and future householders ...'

6.1 – 'Standards of amenity (the features of a place that contribute to its attractiveness and comfort) are major concerns in the health and quality of life of the borough's residents, workers and visitors... Camden's inner London location, the close proximity of various uses and the presence of major roads and railways means there is an amenity is a particularly important issue within the borough. Policy A1 therefore seeks to ensure that standards of amenity are protected'.

6.4 – 'The development's impact upon visual privacy, outlook and disturbance can be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The council would expect that these elements are considered at the design stage of the scheme to prevent potential harmful effects of development on occupiers and neighbours'.

6.5 – 'Loss of daylight and sunlight can be caused if spaces are overshadowed.'

Policy 7 Design & Heritage states – 'The council will require that development within Conservation Areas, preserves or where possible, enhances the character or appearance of the area. Non-designated heritage assets are features valued by the local community and what help to give Camden its distinctive identity. The council will treat the significance of that asset as a material consideration in determining the application'.

Evaluation

Until recently our clients were not aware of the applications for redevelopment, nor were they invited to look at proposals and discuss the scheme by the design team, developer or Camden Council. This explains their lack of involvement and response to the applications to date.

The main issues to be considered in determining this application are:

1. The impact on the Conservation Area
2. The effects on residential amenity
3. Loss of daylight and sunlight.

1. The impact on the Conservation Area

The proposed development is far greater in size, height and scale and is closer to and taller than the existing, well-established residential accommodation in Marchmont Street. It is considered that the proposed building to the east side of the site is overbearing and overdevelopment in terms of its effect on the residential accommodation. This is in long-term use by established occupiers and owners of flats in Marchmont Street.

There is a roof terrace to the rear of flat 1 which has an open aspect, looking east. This is not shown on the architect's drawings or referred to in GVA's report. The effect of the new development on the flats and use of the terrace in 87-89 Marchmont Street is best viewed from Existing Drawing PL00-10, Section 3 and Proposed Drawing PL0031 Rev E Section C-C.

The Existing Section shows single storey accommodation at the rear of Marchmont Street and the Proposed Section shows a six storey development, and whilst this sets back towards the rear of Marchmont Street, it is both closer and considerably taller, with green roofs and balustrades allowing occupiers of the proposed site to be in very close proximity to established residential accommodation. The new structure will immediately abut the rear of the roof terrace, just a few metres from the back wall of Marchmont Street. This differs greatly from the existing arrangement where there is a single storey warehouse framed roof, only slightly higher than the roof terrace. This design conflicts with Policy 6.38 *'We will seek retention of important views and glimpses of green spaces where these have been identified in a Conservation Area spaces above rooflines, gaps between buildings and even small, sometimes isolated, pockets of amenities, can be vital in supporting the notion of openness, provide visual interest, soften the built environment and contributed to wellbeing. These items may also help to define the significance of heritage assets.'*

2. The effects on residential amenity

At present there is no overlooking from the existing buildings to the rear of the residential accommodation in Marchmont Street. The consented scheme of 2015 included plant at uppermost level, but the current application proposed in October 2017, is to change the uppermost level to laboratories with two windows directly facing the rear of 87-89 Marchmont Street. This is best shown in the two drawings of the east elevation as proposed in 2015, Drawing PL0034, and the current proposal of the east elevation showing two new windows, Drawing PL0034 Rev D. These windows will directly overlook residents and the roof terrace.

In addition, there are green roofs at second and third floor levels. While a small note on the drawings says access is for maintenance only, if it is minded to give consent there should be a condition limiting access onto these green roofs for sporadic maintenance only, and that they are roofs not terraces.

If it is minded to grant consent for the new windows in the east elevation then there should be a condition limiting them to having opaque glazing with limited opening and be so maintained.

Nonetheless our clients object to the proposed windows, and we also have concerns there may be light pollution coming from the laboratories in winter months. Therefore it is more appropriate to relocate any windows to an elevation that does not overlook residential accommodation.

The use of the roof terrace at the first floor flat will be affected by the sense of enclosure from the proposed tall wall to the new development. This will affect residential amenity which Camden Council's planning policies aim to resist; *'Policy A1 therefore seeks to ensure that standards of amenity are protected.'*

3. Loss of daylight and sunlight

The GVA report carried out tests on the effects of the proposed development for any loss of daylight and loss of sunlight. They note that there will be a loss for the first floor flat at 87-89 Marchmont Street. This is due to the very close proximity of the proposed tall extension in close proximity to the rear of 87-89 Marchmont Street. This will reduce daylight and sunlight to habitable accommodation. For this reason (and others cited above), the accommodation should be redesigned.

Conclusion

The siting, scale, form, proximity, height and proposed new windows at third floor level to the development does not respect the existing Conservation Area in Marchmont Street or its established residential accommodation.

The proposal constitutes overdevelopment and overlooking of residents which would harm the character and appearance of the Conservation Area, therefore seen as contrary to planning policies. There would be a complete loss of the sense of openness to the roof terrace, which Planning Policy 6.38 seeks to retain.


For these reasons we ask for the scheme to be amended for the 3rd floor windows to be omitted and the accommodation proposed at the rear of the first floor roof terrace to be reduced in height and set back.

It is also noted that fire exit escape stairs to the rear of 87-89 Marchmont Street will be interrupted. The developers should confirm temporary and permanent details for their retained use by existing residents.

My clients ask for the application to be amended and new windows refused.

In light of the above, the local planning authority is respectfully requested to refuse **PLANNING PERMISSION FOR THE DEVELOPMENT PROPOSED IN THIS APPLICATION**

Yours sincerely,



Rosemary Silver FRICS
Carlile Associates

PHOTOGRAPHIC SCHEDULE
TAVISTOCK PLACE – Job Ref 4849



1. FRONT ELEVATION 87-89 MARCHMONT STREET



**2. REAR ELEVATION 87-89 MARCHMONT STREET &
LORD JOHN RUSSELL PUBLIC HOUSE**



3. ROOF TERRACE OF 1ST FLOOR FLAT –
87-89 MARCHMONT STREET LOOKING WEST



4. OPEN ASPECT OF ROOF TERRACE



5. ROOF TERRACE AS VIEWED FROM ABOVE.



6. KITCHEN/DINER WINDOW

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