

Mr P Marfleet
Planning Department
London Borough of Camden
5 Pancras Square
London
N1C 4AG

By email only

9 October 2018

Dear Patrick

PLANNING APPLICATION REF: 2018/3647/P
7A,B,C BAYHAM STREET, LONDON, NW1

We write in objection to the above planning application, which seeks permission for the demolition of the existing low-rise office buildings (B1) and the erection of a 5-storey plus double-basement building comprising mixed office (B1) and hotel (C1) accommodation.

We live at Nos. 2 and 4 King's Terrace and 9 Bayham Street, to the immediate north of the proposed development. The existing urban form of King's Terrace comprises a tight urban grain typical of a historic residential mews, with building heights here noted by the applicant as "significantly lower" relative to the application site. This makes our properties and those of our neighbours the most sensitive to the proposed 5-storey hotel complex at 7ABC Bayham Street.

Objection

We strongly object to this application for a 5-storey hotel immediately adjacent to our homes on the following grounds:

- The principle of a hotel development at this site, which is within a predominantly residential neighbourhood outside Camden Town Centre (contravening Local Plan Policy E3);
- An unacceptable degree of overlooking, loss of privacy and outlook (contravening Local Plan Policy A1);
- The excessive noise and disturbance associated with a materially different 24-hour operation at the site, most notably arising from the publicly-accessible courtyard café/bar with adjoining retractable roof, together with roof terraces above (contravening Local Plan Policies A1 and A4); and
- The unacceptable impacts on the levels of daylight and sunlight currently enjoyed at our properties (contravening Local Plan Policy A1).

Quite simply, this is the wrong development in the wrong location.

The Principle of a 5-Storey Hotel and Publicly Accessible Bar and Café at Bayham Street

The site at 7ABC Bayham Street has the following land use designations as defined on the Camden Local Plan Policies Map (June 2018):

- Outside of Camden Town Centre;
- Outside of the Central London Area
- Outside of the Central Activities Zone
- Outside of Camden's Growth Areas
- Not on a Primary or Secondary Frontage

"Tourism development" including "hotels" is defined as a 'main town centre use' by the National Planning Policy Framework (NPPF), as are publicly accessible cafes and bars. It is therefore for the applicant to demonstrate compliance with the Sequential Test, yet no sequential assessment has been submitted in support of this application.

Paragraph 90 of the NPPF is clear in this regard: *"where a proposal fails to satisfy the Sequential Test, it should be refused"*.

Camden Local Plan Policy E3 sets out the Council's detailed approach to supporting tourism and providing accommodation for those visiting the borough. Policy E3 explicitly states that the Council will expect new, large-scale tourism development and visitor accommodation to be located in the Central London portion of the borough, particularly in the named Growth Areas; and will allow smaller-scale visitor accommodation in the borough's town centres.

Camden considers "large scale developments" to be those that provide additional floorspace of 1,000 sqm or more. The scheme before you proposes 1,109 sqm GIA.

Part C of Local Plan Policy E3 indicates that the Council will consider tourism development outside of these designated areas where it would have a local or "specialist focus". In the applicant's words, the concept of the hotel is that it is "run in synergy with the co-working space and intended to serve the local Camden business and tourist market". In addition, the applicant affirms that the hotel is to be "unique" and "design-led"; and "in this respect the hotel is considered to be 'specialist'". The applicant has failed to articulate any specialist focus and compliance with this policy test. Erecting a 61-room hotel as a bolt-on to re-provided office accommodation does not make the hotel "specialist". The applicant has failed to articulate any specialist focus and compliance with this policy test for an out-of-centre development.

An Unacceptable Degree of Overlooking, Loss of Privacy and Outlook; Excessive Noise and Disturbance; and Unacceptable Impacts on Daylight and Sunlight

The submitted drawing package and Design and Access Statement prepared by Ambigram Architects is vague on details and appears overly conceptual. We have therefore reviewed the scheme before you and raise the following comments and

queries for your further consideration and with reference to our grounds for objection:

Double Basement:

- The likely impact of the proposed double basement in terms of noise and vibration during construction, together with those impacts arising from the publicly accessible café and bar at ground floor, is currently under consideration by our appointed specialists Vanguardia Consulting. We await their findings and we will be submitting further technical evidence in respect of these aspects of the development in due course.

Ground Floor:

- The applicant states that the proposed courtyard is designed to bring light and ventilation deeper into the proposed development through its direct alignment with King's Terrace, but it is not clear what the northern elevational treatment is. This is critical to understanding the potential impacts upon our amenity and quality of life.
- The applicant continues by describing how the courtyard immediately adjacent to our homes would become a visual centrepiece to the publicly accessible bar and café. This element is to form the atrium at the core of the hotel complex, with the proposed retractable glass roof perpetuating significant noise leakage into King's Terrace from the publicly accessible bar and café operating immediately adjacent to this open-air element. What is most striking is that the applicant has chosen the most sensitive and least appropriate area of the building footprint to locate this proposed bar / café.

First Floor

- Whilst the north elevation drawing suggests an opaque northern boundary to the courtyard at lower ground and ground floor, this treatment is glazed at first floor, which gives rise to overlooking, loss of privacy and potential artificial light impacts directly into our properties at King's Terrace.
- The submitted Design and Access Statement indicates opportunities to create balconies directly over Bayham Street with projecting oriel windows, which would give rise to noise and disturbance from use by hotel guests – with hotels comprising a 24-hour material operation.

Second Floor

- Windows are incorporated at the second floor northern elevation (Room 35), together with a northern-facing terrace feature, which directly overlooks the rear of the properties at Bayham Street and those within King's Terrace.
- A small terrace feature and windows also give rise to issues of overlooking and loss of privacy from proposed Room 19.

Third Floor

- A significant glazed link providing circulation for hotel guests is proposed, which directly overlooks properties at the rear of Bayham Street and within King's Terrace (associated with Rooms 38 and 39).
- The incorporation of a planted roof terrace to the entirety of the northern elevation. It is not clear whether these terraces would function as amenity spaces for the enjoyment of hotel guests. Again, the submission package is vague on details – we would hope unintentionally.

Fourth Floor

- A significant glazed link providing circulation for hotel guests is proposed, which directly overlooks properties at the rear of Bayham Street and within King's Terrace. This provides access to Rooms 53 and 54, and functions as a communal area along most of the northern aspect.
- The prevalence of glazing at third and fourth floors, whilst set back, would give rise to significant artificial light impacts.
- The incorporation of a planted roof terrace to the entirety of the northern elevation. It is not clear whether these terraces would function as amenity spaces for the enjoyment of hotel guests. Again, the submission package is vague on details.

Our consultants, Gordon Ingram Associates (GIA), have reviewed the applicant's Daylight and Sunlight Report dated July 2018, and their findings and professional opinions are enclosed with this letter. GIA conclude that the proposed development would cause a noticeable material and permanent loss of amenity to both 2 and 4 King's Terrace and 9 Bayham Street, and that the scheme in its current form should not be granted planning permission.

Having regard to all the above, whilst it is clear that the proposed development represents a clear breach of national and local policy, it also represents a clear and significant threat to our quality of life, our enjoyment of our homes and the operation of our business. We therefore urge the Council in the strongest possible terms to refuse this application.

Yours sincerely,



On behalf of:
2 King's Terrace
4 King's Terrace
9 Bayham Street