

Jon Dingle

Director of Planning
Department of Planning
London Borough of Camden
5 Pancras Square
London
N1C 4AG



Your ref: 2018/4504/P
Our ref: 2164

By email (thomas.sild@camden.gov.uk)

4th December 2018

Dear Sir / Madam

71 Endell Street and 68A Neal Street, London WC2H 9AJ
Planning Application (2018/4504/P)

I write on behalf of my client, Soho Housing Association (SHA), the long leasehold owner of Flats 1 to 7 (inclusive) at 71 Endell Street, in order to object to the current planning application.

SHA have a long and successful track record of creating new developments within central London. They welcome development that creates investment, activity and life in this location; no successful city can ever stand still. SHA are very adept at creating developments that produce high quality environments for their tenants, respect and protect the amenity of neighbouring residents and users and produce high quality architecture that is sensitive to its context.

They are very well positioned, therefore, to judge whether a scheme is likely to produce a scheme that is successful for all those affected by it, or whether a proposal represents over-development, with the commensurate harm that arises from proposals that seek to create more development on a site that it can successfully accommodate.

My client has reviewed the application plans in detail and, based upon the scheme-specific impacts upon their flats below this proposed development, make the following objections,

1. Impact on daylight
2. Impacts during construction
3. Quality of design

These objections are set out below as follows,

1. Impact on Daylight

The seven affordable housing units at 71 Endell Street were created by virtue of planning permission (2012/6861/P) granted on 31st March 2015 (as amended by permission 2015/3800/P dated 15th February 2017). The permission was described as,

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*Change of use from offices (Class B1a) to residential (Class C3) to provide 7 affordable units
(2 x 1 bedroom, 3 x 2 bedroom and 2 x 3 bedroom self-contained flats)*

As is common in central London, the affordable units were delivered via change of use, with the existing building being adapted to provide good quality residential accommodation. The amount of internal daylight received by a flat is an important determinant in the quality of accommodation provided. Indeed, the Council require internal daylight levels in new and existing accommodation to be considered in the determination of planning proposals.

The application has been accompanied by a daylight assessment prepared by eb7. However, the eb7 assessment is inadequate as it has not assessed the potential impact of the proposed development upon the residential accommodation on the floor below.

Having been created through a change of use and being single aspect, the existing top floor accommodation requires daylight from two approved skylights – identified on the diagram enclosed with this letter – to provide daylight to the rear of the units. While the proposed addition keeps the skylights in situ, one has new accommodation next to it, while the other skylight is, in effect, incorporated into the new unit. No consideration has been given to the impact of the proposals on the level of daylight being provided by the skylights, no consideration has been given to the cleaning or maintenance regime for the skylight, both of which would, in effect, become completely inaccessible to the tenant or landlord of the existing affordable unit.

The arrangement of the proposed accommodation around the two skylights is, at best, convoluted. Such a tortuous relationship between skylight and built form is a classic example of over-development, whereby ever more imaginative and unusual arrangements need to be found to try to preserve the status quo.

Eb7 should be required to update their assessment to deal with internal daylight impacts, but even if they conclude the amount of light to the space below is sufficient, regard must be had to the fact that the flat below would lose access and control of their skylights, upon which the quality of the accommodation depends.

For these reasons, the proposals are considered to give rise to an unacceptable impact on the amenity of adjoining residential units and therefore conflict with Policy A1 of the Camden Local Plan 2017.

2. Impacts During Construction

For some time, the planning system has recognised the control of the construction process, and the impacts arising from it, as a material consideration in the determination of applications. It is common for applications to be accompanied by a Construction Method Statement, or for approvals to be granted with a condition requiring the submission of such a document.

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In this instance, although the proposal is technically minor, the process of constructing the additional space will have lengthy and considerable impacts upon residents within my client's affordable units. The ground floor units are occupied by mobility-impaired tenants who benefit from the level access to Endell Street. Particular regard must be had during construction for their needs, as well as the needs of all residents.

In addition, the construction of the additional space above the existing top floor accommodation will have a seriously detrimental impact upon the quality of accommodation below. The applicant, or subsequent developer, will have no ability to temporarily re-house the tenants below during the construction period.

Given the potential severity of the construction impacts, the applicant should be required to explain in detail, how the development would be carried out without causing serious harm to the amenity of residents.

As such, the application proposals are considered to conflict with Policy A4 of the Camden Local Plan.

3. Quality of Design

The existing building is an attractive, two-storey building, commercial in appearing with exposed brick and Crittal-style windows, reflecting its commercial origins. Its size is typical of, and appropriate to, its backland location. The building's size is complimentary to, rather than in competition with, the surrounding buildings which sit in close proximity.

The proposed extension would, in effect, add a partial additional floor, with a material palette that is alien to the original building, in a mass that does not relate to the floors below, and in a form that relates neither to a roof or the features and rhythms of the ground and first floors. The proposed addition does not set back from the edge of the floor below nor does it provide the elevations with a successful termination. The addition bears little, if any relationship to the existing building.

My client welcomes contemporary and interesting architecture, but to be successful, it must be possible to read and understand such modern additions. For example, the addition should relate to the existing building through materiality, mass, form or detail. At present, the proposed extension has no relationship at all to the floors below.

Accordingly, the application proposals are considered to conflict with Policy D1 of the Camden Local Plan 2017.

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I should be very grateful if I could be kept informed of the application's progress. I would be happy to assist with a site visit or providing any further information regarding the affordable housing units below the proposed development, should that be required.

Yours faithfully



Jon Dingle

On behalf of Jon Dingle Ltd