

Application No:	Consultees Name:	Received:	Comment:	Response:
2018/6016/P	G Egan & K Corbett	27/01/2019 14:54:25	OBJ	<p>We are tenants of a flat in 1-10 Summers Street and we object to the current proposals for the development of the Eyre Street Hill Ragged School site.</p> <p>As the Council already knows, the 'Little Italy' area of the Hatton Garden Conservation Area (comprised of Back Hill, Summers Street, Eyre Street Hill and Warner Street) form a key part of the annual Italian Festival with processions having used all of these streets over the past several years. There is NO mention of this in any of the documents and no reference is made of the impact upon the festival during or after the construction phase of this project.</p> <p>We welcome a potential development of the site and were pleased to see Housing requirements being addressed in the plan, however the scale and appearance of the Hotel portion of the development appal us.</p> <p>Our comments fall into 2 broad categories: 1: those with regard to the proposed new buildings and then 2: those with regard to the period of construction.</p> <p>1i. We are dismayed by the scale and appearance of the proposed Hotel/Accommodation building on Eyre Street Hill. The proposed height of 8 floors with an additional plant room floor (which are often stretched by developers to become another pseudo-floor!) is too high. It would dominate the area.</p> <p>The new building makes some attempt to match the colour and horizontal or vertical lines of existing structures but is too massive. The council's Planning department state in their correspondence with the Developer that they are pleased that the view along Summers Street of the Ragged School Tower was being protected. Actually it is almost obliterated.</p> <p>'The Design and Access Statement' on page 52 makes it clear in the proposed drawing that the old Eyre Street Hill vista of the Victorian Italianate structures will be replaced by a new monumental mass which has little architectural merit or appeal. A mere sliver of the Ragged School Tower will be visible.</p> <p>1ii. Camden Council's Hatton Garden Conservation Area document states: 'Spatial character. 5.3 Sub-area 1 ... forms a dense pattern of short, narrow, hilly streets, contained within a framework of three major thoroughfares .... The complex medieval street plan, cut through by these three nineteenth-century roads, creates surprising vistas and transitions in the townscape that are integral to the character. There are many curving or angular plot boundaries and there are also interesting changes in level.'</p> <p>It seems that the scale and appearance of the new building are directly contrary to the existing characteristics highlighted above by the Council.</p> <p>1iii. Planning Statement: 6.71. London Plan Policy 7.4 states that 'Buildings, streets and open spaces should provide a high-quality design response that:</p> <ul style="list-style-type: none"> <li>a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale proportion and mass,</li> <li>b) contributes to a positive relationship between the urban structure and natural landscape features,</li> <li>c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings,</li> <li>d) allows existing buildings and structures that make a positive contribution to the character of the place to influence the future character of the area, and</li> </ul>

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e) is informed by the surrounding historic environment'.

It again seems that these directives are being ignored by the proposed Development.

1iv. The proposed Hotel.

There appears to be copious reference made to the need for a new Boutique or mid-market hotel but very little evidence of any concrete proposal from any particular hotel group.

It is also interesting to note that of the market players mentioned in the submission, Ruby, Hub and Nest tend to have 5 or 6 storey buildings (and NOT 8) with Pestana opting for a far larger footprint. We wondered, in this chaotic pre-Brexit period, what contingencies, if any, are planned for if NO hotel group comes forward? Does the proposed Boutique become a hostel, student accommodation or a lower grade hotel? What assurances does the council have that no change of intended use will be required?

1v. We are also concerned with the impact upon through traffic in the area. We find the Developer's projected 14 weekly vehicular visits to the hotel to be very optimistic and could find no statement as to the likely vehicular requirements for goods and service deliveries to the proposed accommodation block, as well as increased servicing required by the enlarged Office space (which uses Eyre Street Hill access points).

The net result of any new traffic upon the current narrow Eyre Street Hill and very tight left corner from Clerkenwell Road to Eyre Street Hill are not discussed.

1vi. The submitted 'Daylight/Sunlight reports' seem to be misnamed. They appear to measure and discuss direct SUNLIGHT and make NO reference to the impact of an 8 storey mass on the western side of Summers' Street to DAYLIGHT. The western skies directly above the existing Ragged School building are where the majority of our existing afternoon and evening daylight comes from. This will be severely affected by the appearance of a taller and wider block of new buildings.

2 Issues relating to the Construction Phase:

2i. Construction Management Plan states in Point 13:

'Evidence of who was consulted, how the consultation was conducted and a summary of the comments received in response to the consultation should be included. Details of meetings including minutes, lists of attendees etc. should be appended.'

Gerard Egan attended the 'open day' presentation and made some written comments but can see no reference to these in the submission.

2ii. Construction Management Plan states in Point 14:

"We propose to arrange a Construction Working Group with the immediate neighbours in Vine Hill and Eyre Street Hill, and representatives of the adjacent properties on Warner Street

A wider group, including residents and businesses along Eyre Street Hill, Summers Street and Warner Street will be contacted by leaflet drop when key activities take place. This will include larger plant deliveries and similar events that might unusually effect the neighbourhood."

This does not seem to be adequate given that the Summers' Street property has a facade on Eyre Street Hill and that through traffic, street car parking, Emergency Services, Refuse-collection services, Taxis etc will all

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be affected.

2iii. Construction Management Plan states in Point 21:

'Vehicle movements will be limited to between 09.30 and 15.00 on weekdays where practical to do so. Saturdays will only be used for specific deliveries and only after prior consultation with the Construction Working Group.

Deliveries will be made on smaller rigid vehicles that can negotiate the narrow access to Eyre Street Hill for the majority of materials. Where larger lorries are unavoidably required they will be reversed into site from Warner Street by banksmen and traffic marshals.

Typically vehicle movements will be limited to 6-8 lorries per day. During piling works and larger concrete pours during frame construction a peak of 10-12 lorries in a day may occur.'

Given the scale of activity experienced in the work performed on the former Guardian newspaper and University of the Arts sites, these estimates would seem to be extremely optimistic. It is also worth noting that the width of Eyre Street Hill is considerably less than Back Hill and Warner Street and that any through traffic (Emergency Services, Refuse collection, visitor and/or delivery traffic etc) would, in effect, be blocked by the construction traffic. Currently a single Beer Delivery truck to The Gunmakers Public House often causes a complete block of traffic on the Summers Street/Eyre Street corner.

2iv. Noise Impact Assessment | Revision 01

'3.5.2 The Gunmakers Arms was identified as a potential noise source in proximity to the site, but the data has not revealed any significant uplifts in noise along Eyre Street Hill owing to patron activity. As a self-described "little pub", space within the pub is rather limited and this is believed to curb the number of patrons.

Additionally, patrons have been observed to stay within the pub rather than spilling out on to Eyre Street Hill and this is also believed to help control noise emanating from the pub.'

These statements are contentious to say the least! Council Records will show numerous complaints about the CURRENT level of noise in the evenings on Eyre Street Hill. Obviously new housing and Hotel accommodation can only increase that noise.

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2018/6016/P	Susan Vaight, committee member	27/01/2019 19:12:54	OBJ	<p>From the Committee of the Summer's St Residents' Association</p> <p>1. We object to the building proposed on Eyre Street Hill in its present form. The objection essentially turns on the height of the hotel and residential building. It is 8 storeys plus a plant floor, effectively 9 storeys from street level. The slope of the street down to the north means that the measured height adjacent 31 Eyre St Hill is greater than at the southern end adjacent the Gunmakers. This is taller than any of the surrounding buildings; in the drawing showing the proposed west elevation you can see at the right hand side an outline of the Gunmakers overtopped by 5 +1 storeys and the edge of 3-11 Eyre St Hill and behind that 1-10 Summers St with the curved roof. Both these buildings have top floors with roof terraces that would be at a level with the 7th storey of the hotel.</p> <p>The planning statement based on the more detailed TVIHA document describes the planning legislative context which strongly indicates the obligation to respect the local built environment. This includes NPPF para 127 "sympathetic to local character and history", "a strong sense of place"; London Plan Policy 7.6 "a positive contribution", of "a proportion, composition and scale ... that enhances... the public realm" and "not to cause harm to the amenity of surrounding buildings, particularly residential buildings", policy 7.11 that "vistas should be protected". The Camden Local Plan uses similar language in policies D1 and D2. It can be seen that Camden has responded to these national and local concerns, as required by policy D2, by adopting as recently as August 2017 the Hatton Garden Conservation Area Appraisal and Strategy which sets out the criteria for a new building within the Area.</p> <p>The objective of that Strategy is to protect the 'essence of place' of this historic area. Para 9.9 on p 78 of the Management section of the Strategy sets out how this is to be done, specifically that an appropriate height for any new building is 3-6 storeys, that roof lines, building lines and bay rhythm are important considerations, ie what a building looks like and its scale and proportion within its location. A building of this proposed size and roofline does not comply with the requirements. Any reference to the 3-6 storey restriction is notably absent from any of the application documents though there are signs of nervousness about its height. The East elevation drawing showing the Eyre St Hill landscape shows absolutely no correlation between the local roof lines and the top of the proposed hotel. Whilst the fenestration of the affordable housing section is pleasingly simple, the hotel facade bears no relation to any bay width or rhythm of neighbouring buildings.</p> <p>Some existing buildings within the Area have been increased in height by the addition of roof extensions. These are inevitably set back from the facade to reduce visual impact at street level. Where the street facade is an existing building the change to the streetscape is minimal. A new tall building is a totally different animal as it completely changes the streetscape. A new building should therefore be measured very closely to the Area Strategy criteria.</p> <p>2. Furthermore the Strategy document identifies the Ragged School as a local landmark and the view of it along Summers St as a 'locally significant view'. The hotel overtops the roof line of the Ragged School by 2 storeys + plant floor so that only half of the tower, instead of all the tower and the interesting main roof, will be visible in the Summers St view line. It is disrespectful of the Ragged School and its place in the local landscape. Contrary to assertions in the Planning Statement and TVIHA, this obscuring of the view cannot be said to 'enhance' the view.</p> <p>3. Also contrary to statements in those two documents, we say that the hotel is not reminiscent in proportion</p>

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and size of historic Clerkenwell buildings, nor is it a welcome or potentially valued addition to the streetscape for local residents. This proposed building patently fails the tests of the Strategy and should be refused. Should it be allowed, you are tearing up the Strategy and sanctioning the potential destruction of the Hatton Garden Conservation Area for developers' economic gain, no other location in the Area would be safe; whereas adoption of the Strategy had shown that Camden has wider values than that. We look to you to preserve those values.

4. A further objection stems from the height and bulk of the hotel and concerns loss of light and overlooking. A report among the many documents filed with the application identifies over 30 windows in our building as suffering a loss of light. Three, in living rooms on the first and second floor at the corner diagonally opposite the hotel, will suffer a loss greater than permitted in the BRE guidelines. There is a Right to Light that is infringed by this loss. As mentioned above, the upper floor of our building and of 3-11 Eyre St Hill are at a level that will be overlooked by the 7th and 8th floors of the hotel with resultant loss of privacy. This is such a large intervention into the local sky that it will totally dominate our windows. The drawings do not convey how dominant it will be, has a model of the proposal and surrounding buildings been requested? That might show more clearly the effect it will have. At the very least, the planning committee should visit the site and use their powers of visualisation.

5. There are issues arising from the fact that this is a hotel that can accommodate over 300 overnight guests, ie noise and traffic. This is an office and residential area, apart from the Gunmakers pub and the Coach nearby on Warner St. A hotel operating 24/7 to serve that number of guests will inevitably increase disturbance through noise and traffic. The Gunmakers has been the subject of complaints from residents and your Environmental team over noise. This is otherwise a quiet back street area of narrow roads on a medieval plan. The planning statement and TVIHA gloss over the fact that this is a residential area, evidenced by the map of Conservation Area sub-area 1 on p 53 of the Strategy. Indeed, they are wrong in stating that 3-11 Eyre St Hill is an office building, the three upper stories are residential. There are new residential units on the top of Herbal House; each of the adjacent streets Eyre St Hill, Summers St, Vine Hill, Warner St, Laystall St and Roseberry Ave contain residential buildings. Is a 24/7 hotel with such large capacity really appropriate for this residential area? Has the needs assessment for the hotel taken account of the recently reported fall in the number of tourists in the past year?

6. Concerning traffic, the applicant does not seem aware of the Camden scheme TS/CN/Farringdon/2018-19/PA that will close the junction of Eyre St Hill and Farringdon Rd to vehicles and route them along Summers St and Back Hill (recently re-cobbled) which will mean construction HGVs, delivery and service vehicles taking a longer route and passing more of our building. Construction HGVs may reverse into Eyre St Hill from Warner St, increasing contact with cyclists. Two and a half years plus of construction work in this situation will be a nightmare. Eyre St Hill will have increased cycle use when the proposed two-way cycling is allowed. Because of the one-way system traffic will have to join Warner Street (whereas it does not necessarily at present) which is part of new cycle superhighway 6, increasing air pollution and hazard to cyclists. Nowhere in the documents is cycle superhighway 6 mentioned; there should be an assessment of impact on it to comply with NPPF.

7. We recognise that the site is identified by Camden for potential development. The streetscape could be improved by replacing the carpark and rear office building with something new, but this is not the right building. The emphasis given to the architectural quality of the facade does not compensate for the size.

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The application documents suggest the hotel cafe/bar would be a welcome addition, but there is no shortage of eating and drinking places in the neighbourhood, one more is not a necessity. It is suggested that 33 jobs will be created in the hotel but an office building would accommodate a much greater number of working people, perhaps a preferable economic outcome for Camden. Affordable housing is good, this provides 5 affordable and 5 intermediate (income of £30,000 to £40,000), but if the economics of running a hotel in a building of an appropriate size whilst keeping affordable housing does not add up, that should not be a reason to allow an overlarge building. The Financial Viability document seems to indicate that the capital value resides heavily in the refurbished Ragged School with lettable carpark and that changing use of the carpark to a hotel and affordable housing adds a minimal increase. There should therefore be scope to reassess the change of use of the carpark to a more suitable building without economic loss to the developer and without detriment to the local Conservation Area and its residents.

This application should be refused.

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In principle, I support the redevelopment of the car park site on Eyre Street Hill and the provision of affordable/intermediate housing but I object in the strongest possible terms to the height and disproportionate scale of the proposed hotel and the general disturbance it will cause.

I am not alone; 40% of your respondents in the Community consultation seemingly also objected to the height. It is totally incongruent with the criteria of The Hatton Garden Conservation area. Planning decisions should be made on the basis of compatibility with the local environment and not on how many beds a hotel needs to have to make it viable.

In terms of process, none of the supporting papers directly address the impact on the development of Camden's proposed changes in traffic flows in the area related to the cycle superhighway or the hotel's incompatibility with the Hatton Garden Conservation Plan.

#### HOTEL LOCATION

After the offices close, the local area of Summers Street/Eyre Street Hill/Warner Street/Back Hill is densely residential in the redeveloped buildings. I do not believe that it is appropriate to locate a 24/7, 153 bed hotel in such an area. Major hotels should be located on main roads with easy access.

In the couple of decades we have lived in the area Camden have made beneficial changes in the local road system and reduced traffic flow (the rat run) by the closing off of Back Hill and the reversal of the one-way direction of Summers Street. In August 2018 the Cabinet member for Improving Camden's Environment took the decision to close off the entrance to Eyre Street Hill from the Clerkenwell Road to vehicular traffic with the exception of cyclists; to make Eyre Street Hill from Summers Street to Warner Street one-way for vehicles but two-way for cyclists; to reverse the direction of one-way traffic in Summers Street; and finally to make no net reduction in parking availability. These changes to be implemented early this year.

This raises a number of issues that have not been addressed. Up to 300 nightly guests along with the cafe and restaurant clientele will inevitably create demand for taxis/ubers in addition to all the delivery vehicles servicing the hotel and restaurant. Under the proposed new traffic scheme these additional vehicles will need to navigate down Back Hill, along Summers Street and down Eyre Street Hill. Purposely to generate incremental traffic in narrow, effectively residential streets seems a perverse reversal of a previously successful policy.

Secondly, because of the on-road parking any vehicles parked even temporarily outside the hotel will effectively block the road to other vehicles and the two-way cyclists.

The busiest times for taxis will be morning and evening which coincides with the busiest time for the cyclists along Ray/Warner Street which they will which they will have to transect. Surely this constitutes a potential safety issue and is counter to the whole concept of safe cycle routes. According to the NPPF, development should be prevented if it has an impact on highway safety.

The vehicles involved in the renovation of Herbal House effectively ruined the cobbles in Back Hill but they

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were very sympathetically re-laid last year after the construction phase. One presumes that during the two and a half construction phase of Eyre Street Hill Camden will require all construction vehicles and supplies to reverse across the cycle super highway and up Eyre Street Hill to avoid damaging the re-set cobbles. This constitutes a further safety risk.

Eyre Street Hill is a very narrow street and the current high buildings at the south end form a canyon effect which amplify the noise, According to para 3.5.2 of the Noise/Acoustic report there was no significant uplift in noise along Eyre Street Hill owing to patron activity in the Gunmakers Arms and patrons stay within the pub. This is wishful thinking and completely inaccurate. As with other Central London pubs, patrons spill out in large numbers on to the pavement. There have been frequent (on the record) complaints from nearby residents to Camden Council regarding the noise associated with the Gunmakers that resulted in a recent intervention by Council officials to try to reduce the outside noise after 10pm. In the summer in particular, patrons drink on the narrow pavement outside the pub and migrate all down the Hill adjacent the proposed site. The noise gets louder as the evening and drinking progress. The drinkers outside will potentially pose a risk to hotel clientele approaching from the Clerkenwell Road since they will have to walk on the road with their backs to the traffic to circumvent the occupied narrow pavements.

The height of the proposed hotel which will be three stories higher than any adjacent building will only serve to exacerbate this canyon-like reverberation and thus local residents will suffer a severe loss of amenity at night from the noise of The Gunmakers, extra vehicles, wheelie cases going down Eyre Street Hill, smokers in the street and the inevitable loud voices in arrival/departure associated with a 24/7 hotel and restaurant.

#### BUILDING HEIGHT AND COMPATIBILITY

However, my main objection is with the disproportionate height and scale of the proposed hotel. While the building itself maybe an impressive self-standing piece of architecture, at 43.5 metres high it is too high for its location - compare it with the height of Sandra House to its south, the Ragged School tower and the three storey listed buildings to the north. It will overwhelm a narrow street and significantly attenuate Summers Street residents' natural light. I am one of the unfortunate residents who will suffer over a 20% reduction of daylight into my living room, a loss greater than the BRE guidelines. However, the Noise/Acoustic Report then goes on to say that by applying the No-Sky-Line Test this loss of light magically disappears and "daylight distribution remains unchanged". To the layperson this makes no sense at all, how does changing the measurement criteria at a stroke restore my lost light? I have one window and my neighbour in the flat below has two that will lose more light than the BRE guidelines. Period. Overall, some 30 windows in Summers Street will lose living room light. We face north, so the light is attenuated to start with. 16 Vine Hill and Rosebery Square also suffer from loss of light. Citizens have by law a longstanding right to light and a right to maintain the level of illumination. It is inconceivable with such a towering building so close that we shall not lose a significant amount of natural light.

The Hatton Garden Conservation Area and Appraisal and Management Strategy of August 2017 categorises the immediate area of the site as predominantly residential with buildings of no more than 5-6 storeys. It further identifies 1-10 Summers Street, Herbal House and Sandra house as making a positive contribution to the area in addition to the listing of 33-37 Eyre Street Hill. The view from Summers Street of the Ragged



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School Tower is also classed as locally significant.

With regard to development, the Conservation Strategy looks to enhancing the area. It goes on to say that important considerations are building lines, roof lines and the bay rhythm of adjacent properties. Prevailing heights are generally 3-6 storeys which will be considered the appropriate height for new development.

The planning application for the hotel meets none of these conservation criteria. The hotel is non-residential, it is 9 storeys high including the plant on the roof and it completely ignores roof lines - it is some 7 storeys higher than the adjacent listed buildings at the bottom end of Eyre Street Hill because the street slopes down. Consistency of building lines, roof lines and bay rhythm is completely non-existent. It is better described as cacophony rather than street rhythm. Historically Eyre Street Hill led down to the River Fleet and this impression will be lost to future generations; doesn't history need to be legible in architecture in a conservation area?

Moreover, from most of Summers Street the locally significant view of the Ragged School tower will be invisible behind the hotel. Surely such a well-argued, sensible Conservation Strategy needs to be rigorously and consistently applied otherwise it defeats its purpose. Why are developers not automatically required to follow its framework guidance? It is disconcerting to current and future residents within the Conservation Area to discover the very sensible framework put forward in the 2017 document can be so easily overridden.

If councillors on the Planning Committee are in any doubt about the suitability of such a building, they should pay a personal visit to the area or at least view a scale model.

#### FOOD AND BEVERAGE PROVISION

The supporting papers promote the provision of food and beverage as a positive enhancement to the area; this is a complete red-herring (pardon the pun). If there is one thing that Clerkenwell is replete with, it's eating and drinking places; the authors obviously did not visit Leather Lane at lunch time.

#### FINANCIAL VIABILITY ASSESSMENT

16. Paragraph 3.13 states that the provision between affordable rented and intermediate homes is 62/38 on a habitable room basis. This diametrically disagrees with Table 2 in 3.10 where the ratio is 38/62. Table 2 is wrong. Such inconsistency and lack of care so early in the document is not reassuring to the lay reader.

17. Paragraph 8.17 states that the profit expectation on the hotel is 15% but 12% on the office. Why should the profit on the hotel be expected to be 25% higher than the office? By lowering the profit expectation to the office level would it not be possible to reduce the number of rooms and hence the height of the building to make it more compatible with the conservation requirements?

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18. Paragraph 10.14 states that the assumed sales price of £1,150psf for the intermediate units similar to the Bourne Estate price is optimistic, although this is almost a quarter below the £1,417psf being sought for the Mount Pleasant scheme. It is arguable that the quality of the residential developments in the vicinity of Eyre Street Hill should allow a price between the two to be achieved.
19. Although the economics of a alternative housing scheme with a smaller hotel is tested, the economics of a six storey office block with the same provision of affordable/intermediate housing is not. How would this compare? Further office space would bring much higher value employment to the area.
20. Table 10 in 11.3 summarises the Appraisal Results. In Section 9 Allsop LLP estimates the undeveloped site value with a refurbishment of the Ragged School and continued use of Eyre Street Hill as a car park at £20 million. Table 10 estimates the value of the site after total redevelopment at £20.7m, a 3.5% margin which must be in range of estimating error. I would argue that such a minimal return is not nearly enough to compensate the loss of amenity to residents - increased traffic, loss of light, 24/7 noise and disturbance, risks to cyclists, being overlooked - coupled with the violation of the Hatton Garden Conservation Area development criteria.

#### CONCLUSION

21. The application should be summarily rejected. The amenity loss to local residents couple with safety considerations and the despoiling of the Hatton Garden Conservation Area far outweighs the provision of five affordable and intermediate flats.
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