

Mark Morrison

Flat 11, 1-10 Summers Street

London

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25 May 2019

Ms. Laura Hazelton
Senior Planning Officer
London Borough of Camden

(By email only)

Dear Ms. Hazelton

Planning application 2019/1108/P

I wish to object in the strongest possible terms to the application to build a significant roof extension at 144A Clerkenwell Road as part of the above planning application.

I believe the proposed scheme would have a severely negative impact on the current amenity of my building 1-10 Summers Street, which is in breach of the Camden Planning Guidance originally issued in respect of the forerunner to this scheme March 2018. I have set out the specifics below.

Furthermore, I believe that the proposed scheme is a classic example of over-development, with practically zero concern for the impact of the design on residents of 1-10 Summers Street. As I set out in this letter, there are a number of ways in which the proposed scheme impacts unnecessarily heavily the amenity value to 1 – 10 Summers Street, to limited marginal benefit to the developer.

I would note that there has been no attempt by the developer to engage with the residents of 1-10 Summers Street, or take any of our reasonable objections to the 2018 scheme into account.

I believe this scheme represents a thoughtless and careless approach to development, focusing solely on the creation of maximum financial value to an owner not resident in the borough, placing no value on the concerns and interests of a large building of long-time Camden residents.

My specific issues with the proposed scheme are as follows:

- Loss of light to most of the flats in 1-10 Summers Street well below BREEAM standards
- Overlooking and noise
- Overbearing oppressive design
- Not respecting the setting and character of the 2 buildings
- Overdevelopment of the site

I believe that the proposed development does not take account of Camden's Local Plan Policy A1 which states:

"To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011)."

I also believe the proposed development does not respect and take account of Camden Council's specific guidance in the pre-application advice report from 2018, which states (emphasis added):

"There is concern about the impact of the development on the amenity of occupants of 1-10 Summers Street in terms of outlook and daylight. Although a right to light assessment has informed the pre-app proposals, this issue would need to be fully assessed by a daylight/sunlight report to check the development would comply with BREEAM standards. The proposed extension would sit just a few metres away from the south-facing windows of these apartments and is likely to have a significant impact on daylight, sunlight and outlook. No development would be found acceptable unless it was fully demonstrated that the works would not result in detrimental impacts upon these neighbouring residents."

1. Loss of Light

The BREEAM standards require that there be a ratio change no greater than 0.8 (equivalent to a 20% reduction) in any of the light ratios referred to above. On this basis, the proposed development is hugely in breach of these standards, with reductions of 80-100% in the key ratios.

Therefore the proposed development will seriously impact most of the Camden residents within 1-10 Summers Street.

I urge the council to take into account the huge impact that the proposed development will have on the quality of life and the value of to our properties, as well as the above-demonstrated non-compliance with the Camden Local Plan Policy A1, BREEAM standards for development and Camden Council's own pre-application guidance.

2. Overlooking on most flats in 1-10 Summers Street

As a result of a number of measures specified as permanent conditions of the original planning permission granted to allow the first upward extension of 144A Clerkenwell Road in 1999 (see Condition 3 of permission PS9904079R2 and PS9904853).

Specifically, the area of offices facing the rear of my building does not currently overlook as:

- The current modest office space is set well back from the boundary of 144A Clerkenwell Road
- Tall bamboo screening is maintained in line with the permanent condition referred to above
- Rough pebble maintained to prevent people from walking into that area of the roof in line with the permanent condition referred to above

The combination of these thoughtful measures, all specified by Camden Council in 1999, mean that the bedrooms in my building are currently private and not overlooked by anyone.

Under the proposed scheme, residents in 1-10 Summers St would be significantly overlooked by the following

- New glass fronted offices on the 3rd floor of the proposed scheme, significantly nearer to the boundary of 144A Clerkenwell Road than the current modest structure, apparently as close as 5 metres from bedroom windows, with no mitigation measures or screening visible in the proposal
- Accessible 3rd floor "maintenance walkway" on the Summers Street side of the building where currently rough pebbles are used to prevent access – there are no indications of any measures to prevent this being used by office occupants as an amenity, which of course it will be unless proper measures are taken

This overlooking and loss of privacy are in contravention of Camden Local Plan Policy A1 and the proposed scheme does not seem to have taken into account Section 2 of Camden's Planning Guidance or have been designed with any attempts to reduce or mitigate overlooking or minimize impact on the privacy of adjoining properties, indeed social areas have been created in the most sensitive locations.

3. Overbearing design

The proposed scheme seeks to maximize the floorspace of the development with no regard to the impact on adjoining buildings.

1-10 Summers Street is an important local building of high architectural quality, and the proposed scheme does not respect the architectural hierarchy between the two buildings or the views from and spaces between them, and does not sit sensitively in the context of the site.

If any extension of the current modest structure on the roof of 144A Clerkenwell Road is to be considered acceptable to Camden Council, I would hope that it would be significantly smaller and more architecturally sensitive than the proposed scheme, and address the loss of light and overlooking concerns which I and so many of my neighbours have.

I do agree however that the final development should have a green roof.

I repeat my objection to the proposed scheme in the strongest possible terms and urge Camden Council to protect the legitimate interests of myself and a building full of long-time Camden residents over those of a non-resident developer.

Yours sincerely,

Mark Morrison