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The London Borough of Camden
Planning Services
2nd Floor, 5 Pancras Square
C/o Town Hall, Judd Street
London WC1H 9JE

4th June 2019

Our Ref: KWM/Sanne

Dear Sirs

REPRESENTATIONS TO PLANNING APPLICATION 2019/1108/P - 144A CLERKENWELL ROAD, EC1R 5DF

EXTENSION OF EXISTING THIRD FLOOR AND INSTALLATION OF A GREEN ROOF, ALTERATIONS TO BACK HILL ENTRANCE; ERECTION OF NEW EXTERNAL SPIRAL STAIRCASE TO NORTHERN LIGHTWELL AND REFURBISHMENT OF EXISTING OFFICE SPACE.

We write in respect of the above planning application and whilst we understand the date for submission of comments was 27th May 2019 we and our client were not directly notified of the application despite its impact on their property. We therefore hope you will still consider this submission.

We act on behalf of the Freeholder of the premises at 150 -152 Clerkenwell Road and 2 Eyre Street Hill, London EC1R 5ET which directly adjoins the application site to the west. Whilst we support the principle of introducing higher quality office space to the area, we again raise objections to the extension of the third floor. We consider that the scheme in its current form, which has changed little since the submission of application 2018/1325/P, would cause unacceptable harm to the amenity and the functionality of the premises at no.150-152 Clerkenwell Road, in respect of the impact on its natural light levels, amenity and outlook generated from the proposed addition to the third floor.

By way of background, the premises at 150-152 Clerkenwell Road are in D1 use (Non-residential Institution) and have been let on a 25-year lease to the Fordham University, a private American university based in New York. The University has relocated its London Campus from South Kensington to Clerkenwell and opened in August 2018. The campus comprises a contemporary student centre, including a separate learning resource centre as well as dedicated performance space for the Drama programme plus a further two floors with state of the art classrooms for the liberal arts and business programmes. A priority for such an educational establishment is the provision of a high-quality learning environment. This includes the necessity for classroom space and faculty offices to provide the requisite amount of natural light required for a satisfactory environment.

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The proposed scheme would result in the natural light levels to a number of windows at no.150-152 falling short of the BRE guidelines. The scheme therefore results in compromised light levels to the classroom and office space.

Accordingly, we raise objections in respect of the following:

1. The impact of the third floor extension on daylight levels and the reduced amenity to the educational use due to reduced natural light and outlook; and

Impact on the amenity of the educational use at 150-152 Clerkenwell Road

Standards of amenity are recognised as being major factors in the health and quality of life of the borough's residents, workers and visitors and fundamental to Camden's attractiveness and success. Policy is clear in that this protection is not limited to residential uses.

Local Plan Policy A1 *Managing the impact of development* protects the quality of life of occupiers and neighbours and resists development that causes unacceptable harm. Of particular relevance are the potential impacts relating to daylight levels, outlook and sense of enclosure and noise levels.

i. Daylight Levels

Planning application 2019/1108/P is supported by a *Daylight, Sunlight and Overshadowing Report*. Paragraph 2.2.2 of the BRE Guide recognises that non-domestic buildings including schools have a reasonable expectation of daylight. The assessment of daylight levels in the supporting report identifies that 3 of the windows on the second floor on the White Bear Yard elevation fall below BRE criteria.



Extract from Bing Maps



The document shows the windows that fail are intended for the use as classrooms. The classrooms were located on the upper floors to maximise natural light levels and this has now been compromised. In addition, the outlook for the students would be oppressive. Based on the unacceptable impact to the existing use we consider that the proposed third extension is not appropriate in this location and, contrary to Local Plan Policy A1, causes unacceptable harm.

ii. Noise Levels and impact of the terrace

The application includes a third floor terrace directly outside the classroom windows at no.150-152. Paragraph 123 of the NPPF provides the overall aims in terms of noise when determining planning applications. This being to *"Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adviser impacts on health and quality of life rising from new development, including through the use of conditions"*

Local Plan Policy A4 *Noise and Vibration* requires development to have regard to Camden's Noise and Vibration thresholds and proposals are resisted where they are likely to generate unacceptable noise and vibration impacts.

Paragraph 6.90 of the Local Plan recognises noise sensitive developments as including housing, schools and hospitals as well as offices, workshops and open spaces.

Full access is shown across the third floor terrace directly outside the classroom windows. In this regard we would seek further clarification on the noise impact of the third floor terrace. The use of the building will have intensified as will the use of the terrace and this impact needs to be understood.

Notwithstanding this we consider that the roof terrace is contrary to the objectives of Local Plan Policy A4.

Recommendations

Based on amenity grounds we consider that the additional extension at third floor level across the entirety of the building is inappropriate by virtue of its impact on natural light levels, outlook and overall reduced amenity to the existing educational use.

Should the application be permitted we request access be restricted to the third floor terrace outside the classroom windows.

Yours faithfully

A black rectangular box redacting the signature of K W Morgan.

K W Morgan FRICS
Director

