

# Gordon Mansions Residents Association

Please reply to: Clive Henderson, Chair, Gordon Mansions Residents Association,

Regeneration and Planning,  
Development Management,  
London Borough of Camden,  
Town Hall, Judd Street,  
London WC1H 8ND.

14<sup>th</sup> June 2019

\* **18<sup>th</sup> June 2019: Typing error corrected: on Page 3, para (1) – last line**

For the attention of Seonaid Carr, Principal Planning Officer.

By email to: [seonaid.carr@camden.gov.uk](mailto:seonaid.carr@camden.gov.uk) and [planning@camden.gov.uk](mailto:planning@camden.gov.uk)

Dear Seonaid Carr,

**Re: Former Royal Ear Hospital & Student Union buildings, Capper St/Huntley St, WC1:**  
**Details of Internal and external lighting as required by Condition 21 of planning permission 2015/1281/P dated 20/01/2016 for erection of 6 storey building, and excavation works to create a 3 storey building, comprising a head & Neck Outpatient hospital (Class D1), following demolition of former UCL Medical Student Union & Royal Ear Hospital buildings.**  
**Planning Application ref: 2019/1874/P**  
**Details of Internal and External Lighting as required by Condition 21 for UCLH's Phase 5 development: UCLH's new Head & Neck (Dental) Hospital:**

I am writing on behalf of Gordon Mansions Residents Association (GMRA). We wish to comment on and object to aspects of the proposed Internal and External Lighting, as set out below:

## **Condition 21:**

Condition 21 states:

*"Before the relevant part of the development commences, a scheme, detailing the internal and external lighting proposals and predicted light levels and any mitigation required to ensure there is no adverse impact on neighbouring properties or the highway, shall be submitted to and approved by the local planning authority. The approved scheme shall be installed prior to occupation and remain in place for the lifetime of the development."*

## **Gordon Mansions and the local residential community:**

Gordon Mansions consists of two blocks of flats (77 in total). There is a long established residential community here in Gordon Mansions, which very much reflects the cross-section of the diverse population of Fitzrovia, having as it does a mix of different income, cultural and ethnic groups, including families with young children, and elderly people.

Our two blocks are located at the junction of Huntley Street and Torrington Place. We are immediate neighbours: one of our blocks (flats 1 to 30) is next to/on the party wall of this new UCLH Phase 5/Dental Hospital building; and the other block (flats 31 to 75) is diagonally opposite this new UCLH Phase 5/Dental Hospital building in Huntley Street.

## **Community Working Group Meeting of 11<sup>th</sup> June 2019 held by UCLH & Mace:**

At this recent meeting, we sought to clarify the lighting proposals, including the hours of operation of the building. We also raised recent complaints by our residents of light pollution from the building including when the new internal lighting (in the public corridors) was being tested. Unfortunately, the Minutes of this meeting are not yet available.

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Re: Details of Internal and External Lighting as required by Condition 21,  
for UCLH's Phase 5 development: UCLH's new Head & Neck (Dental) Hospital:  
(Former Royal Ear Hospital & Student Union, Capper St/Huntley St, WC1) - *continued*:

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**Community Working Group Meeting of 11<sup>th</sup> June 2019 held by UCLH & Mace – continued:**

Although this is an outpatients building (i.e. daytime use), we were concerned to hear of the late hours of use. Our understanding is that the building and lighting will be on until:

For Monday and Fridays: open and lighting until 6.30pm

For Tuesdays, Wednesday, Thursdays: open and lighting until 8.30pm

But, lighting not turned off until 11.00pm in the building.

Cleaners in the building until say 9.30pm.

Also, lighting will be on sensor control, bought will stay on for 25 minutes after the person has left the space/room.

Thus, we are particularly concerned about the lighting in the public corridors (1<sup>st</sup> to 4<sup>th</sup> Floors) with their large areas of windows/glazing overlooking Huntley Street, diagonally opposite the Gordon Mansions flats of Block 2.

**Recent complaints from residents concerning light pollution from this Phas 5 site/building:**

Residents in Block 2 (flats 31 to 75), overlooking Huntley Street and diagonally opposite the building, have complained to Mace/contractor about the high degree of light pollution affecting flats at night time. Initially this related to the site lighting within the building. But, also related to when the new lighting in the public corridors (1<sup>st</sup> to 4<sup>th</sup> Floors) was being tested – these are large, bright ceiling light panels. These public corridors have large areas of windows/glazing overlooking Huntley Street. When I myself visited the street at night time, I was surprised at the amount and brightness of the light pollution from this lighting.

Also, residents in Block 1 (flats 1 to 30), whose flats and bedrooms overlook Huntley Street, have also recently complained to us about light pollution; and saying that there has become a noticeable difference at night time now (with the new UCLH building) compared with previously when the street was relatively dark. These flats in Block 1 (flats 1 to 30) are on the same side of the street as the UCLH building, so this "indirect" light pollution and loss of "darkness" is of great concern.

**GMRA's previous comments re. light pollution:**

In our comment/objection letter of 19<sup>th</sup> April 2015 regarding the original planning application (2015/1281/P) for the UCL Dental Hospital building, we particularly asked for protection against light pollution and wrote as follows:

*"Re: Light pollution:*

*Although this is not a 24-hour building, we know from experience of the Cancer Centre building that there is night-time light pollution from the building, due to certain lights still needing to be one for safety and security reasons.*

*Because the proposed UCLH building will be very close to the residential flats, we would ask that there is a condition that there are blinds (or similar) on the windows (Huntley Street elevation) to prevent light pollution affecting the flats opposite during out-of-hours (night times)."*

**Fitzrovia Area Action Plan:**

Under Residential Amenity/Principle 9, the policy recognises that "... the interface in Fitzrovia between residential concentrations and large institutions and office blocks, for example in Huntley Street ....." can cause problems, and goes in to say that such medical institutions "... can cause disturbance to residents through servicing ..... and lighting ...".

Our location (Torrington Place/Huntley Street/Ridgmount Gardens between Tottenham Court Road and Gower Street) is regarded as one of the most concentrated residential areas in Fitzrovia.

**Our concerns:**

Condition 21 states that the internal and external lighting should be such as "... to ensure no adverse impact on neighbouring properties ...".

For our residents in Gordon Mansions, we are not convinced that there will be no such adverse

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**Our concerns - continued:**

impact on the residential amenity of the flats due to light pollution.

We are particularly concerned about:

(1). **Level of brightness:**

The applicant's lighting consultant's report (ILP) appears to have designated our area as Zone type E4: Urban, which is described as "high district brightness" for "town/city centres with high levels of night-time activity".

We are not clear how this designation is arrived at, but which to strongly object.

This part of Fitzrovia (Huntley Street/Torrington Place), although of mixed use, is highly residential with one of the greatest concentrations of residential in Fitzrovia. In this part of Huntley Street, there are the two Gordon Mansions' blocks (next door and diagonally opposite) and the row of terraced houses opposite the new UCLH Dental Hospital building. In addition, Huntley Street is quiet in the evenings and night time; **there is NO high-level night time activity.**

(2). **Internal lighting from the public corridors (1<sup>st</sup> Floor to 4<sup>th</sup>/5<sup>th</sup> Floor) overlooking Huntley Street:**

As described above, these public corridors have large areas of windows/glazing overlooking Huntley Street. Residents have already experienced light pollution at night time from these corridors when the proposed internal lighting was being tested.

There should either be blinds on the windows (within glazing) and/or time restrictions, so that there is not light pollution affecting the residential flats in early evening and night time.

(3). **Lighting in the Roof Garden:**

For the flats in the upper storeys of Gordon Mansions (Block 2), diagonally opposite the new UCLH building, there is concern about light pollution from the Roof Garden.

Although Condition 16 of the Planning Permission (2015/1281/P dated 20/01/2016) states that the roof terrace shall not be used for any purpose between the hours of 21:00 and 8:00, we feel that there should be a condition to ensure that the lighting in the roof garden is also off during these hours.

(4). **External lighting at the Main Entrance in Huntley Street:**

We are not entirely clear how much external lighting is proposed at the Main Entrance, and to what degree its affects are mitigated. We are concerned that if the light source is of high brightness, there will be light pollution due to reflected light off the paving.

I know from experience in overlooking Torrington Place, there is light pollution from very bright (LED-type) entrance lighting to the Heal's office building (diagonally opposite Gordon Mansions) – although the lighting points downwards to the pavement, there is high reflection off the paving (and thus light pollution) due to the high level of brightness of the light source.

(5). **Hours the building is in use; and lighting:**

Because the new UCLH building is regarded as for out-patients, it has been assumed that its use would be daytime only; and not in use evenings and night time; and thus there is unlikely to be light pollution from the internal and external lighting.

In their Planning Statement of Feb 2015, UCLH said that the proposed building will be in use during working hours only with the exception of any staff working late and/or limited cleaning and servicing.

Nonetheless, from what has been said above, this is a deceptive assumption. Also, there is no guarantee, in planning terms, that the building could not evolve into upto 24-hour use in the future.

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(5). Hours the building is in use; and lighting – *continued*:

We would particularly ask for clarity on the hours of use for each day of the week, and particularly the hours when the lighting (both internal and external) will be on. These hours of use and the hours when lighting will be on are especially important regarding:

- (a). the Public Corridors, with their large areas of glazing, at 1<sup>st</sup> to 4<sup>th</sup>/5<sup>th</sup> Floor levels;  
(cleaning and servicing are likely to take place at late evening/night time hours, and thus this lighting will be on, with the consequent high level of bright-light pollution via the large areas of glazing overlooking Huntkey Street).
- (b). the Main Entrance;
- (c). the Roof Garden;

due to the likely light pollution to the Gordon Mansions flats.

In conclusion:

- We are not convinced that there will be no adverse impact on the residential amenity of the flats due to light pollution with the lighting scheme currently proposed;
- We strongly object to the designation of the area as being regarded as Zone type E4 (regarding brightness of lighting);
- We ask that consideration be given to Conditions:
  - (a). to limit the hours that the lighting is on (including for the Roof Garden) and/or
  - (b). that blinds (within the glass) are fitted (especially to the large areas of glazing in the Public Corridors overlooking Huntley Street),  
in order to prevent late evening and night time light pollution to the residential flat

If you have any queries on anything in our letter, do please contact me on my mobile 07967 856 167.

Yours sincerely,

Clive Henderson,  
Chair,  
On behalf of Gordon Mansions Residents Association.

Copy: Sandra Wheen, Secretary/GMRA  
GMRA Committee  
Local councillors