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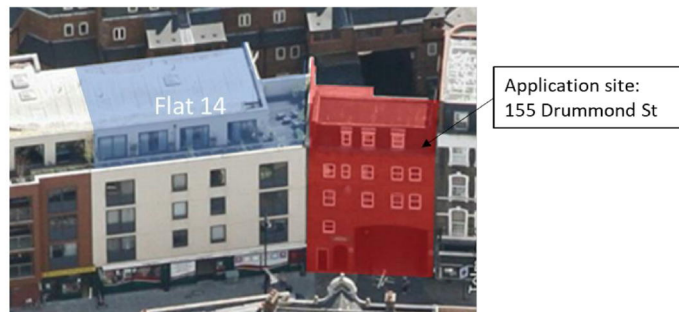
Nora-Andreea Constantinescu
Regeneration and Planning
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London WC1H 9JE

Dear Ms Constantinescu

OBJECTIONS to planning application 2019/1653/P - 155 Drummond Street London NW1 2PB

I am instructed by Mr [REDACTED] of Flat 14 141-153 Drummond Street, to submit the objections contained in this letter to planning application 2019/1653/P relating to 155 Drummond Street.

As you will be aware, the planning application proposes the partial demolition of the existing four storey residential building at 155 Drummond Street and the erection of an eight-storey residential building.



View from North

The grounds of objection are grouped under two headings:

1. Unacceptable harm to neighbour amenity
2. Unacceptable impact on the character of Drummond Street

1. Unacceptable harm to neighbour amenity

Mr [REDACTED] lives in flat No. [REDACTED] on the [REDACTED] floor of 141-153 Drummond Street.

You will see from the images in Appendix 1 of this letter that Flat 14 has a roof terrace, the western wall of which is approximately 2m at its highest point and is part of a party wall with 155 Drummond Street.

You will also see that [REDACTED] roof terrace and the western facing windows of his living room and bedroom currently benefit from high levels of daylight and afternoon sunlight.

The sections of the proposed scheme shown on the application drawing P.23 indicate that the proposed development will increase the height of the western wall across its entire length by some 11m-12m. This will obviously block out a large proportion of the **daylight and afternoon sunlight** currently received by [REDACTED] roof terrace and the western facing windows of his living room and bedroom.

It will also be a hugely **overbearing presence** for users of the roof terrace and when viewed from these windows, severely impacting the current open outlook.

Although the position and height of the proposed development in relation to Flat 14 clearly fails the Building Research Establishment's 45-degree and 25-degree tests for requiring a daylight and sunlight report¹, the applicant has not submitted such a report. It is also clear that the proposed development would fail these tests in relation to other residential properties on the northern side of Drummond Street and to the south in Tolmers Square.

Without a daylight and sunlight report it is not possible to quantify the extent of the proposed development's impact on the daylight and sunlight levels currently received by Flat 14's terrace and western facing windows, but it is clear the impact would be severe. The impact on neighbouring properties to the north and south also appears severe.

The height of the proposed development is nearly double the prevailing height of neighbouring buildings including Flat 14. This means it has the potential to change the local microclimate, particularly the **local wind environment** as experienced on the terrace of Flat 14. Tall buildings in the area already create higher wind speeds over this part of Drummond Street so it is essential that the proposed development does not exacerbate the conditions further to create an unacceptable wind environment on the terrace of Flat 14. In accordance with para 7.11 of *Camden Planning Guidance: Amenity (March 2018)* the applicant should in the first instance submit a Wind Impact Statement so that the impact on the local wind environment can be assessed.

We also note that the proposed development includes a lift shaft extending to the 6th floor in the south eastern corner abutting 141-153 Drummond Street. Operation of the lift has the potential to cause **noise and vibration impacts** on the apartments of 141-153 Drummond Street including Flat 14 and its roof terrace. In accordance with para 6.4 of *Camden Planning Guidance: Amenity (March 2018)* the applicant should in the first instance submit an acoustic report so that the potential noise and vibration levels can be assessed.

Mr [REDACTED] therefore **objects** to the proposed scheme on the grounds that it will cause unacceptable harm to amenity by virtue of the outlook, sunlight, daylight, overshadowing, wind and potential noise/vibration impacts it would have on Flat 14 as well as neighbouring properties to the north and south of the site. As such, the proposed development is not in accordance with Policy A1 of the *Camden Local Plan (2017)*:

"Policy A1 Managing the impact of development

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

¹ as explained in Chapter 3 of LB Camden's *Camden Planning Guidance: Amenity (March 2018)*

We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- d. require mitigation measures where necessary.

The factors we will consider include:

- e. visual privacy, outlook;
- f. sunlight, daylight and overshadowing;
- ...
- j. noise and vibration levels
- l microclimate”

The potential of the proposed development to generate noise and vibration through the operation of the lifts means it may also not be in accordance with policy A4 of the *Camden Local Plan (2017)*:

“Policy A4 Noise and vibration

The Council will seek to ensure that noise and vibration is controlled and managed.

Development should have regard to Camden’s Noise and Vibration Thresholds (Appendix 3). We will not grant planning permission for:

- a. development likely to generate unacceptable noise and vibration impacts;*

....

We will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity...”

We also note that the proposed development would be contrary to the guidance in para 2.14 of *Camden Planning Guidance: Amenity (March 2018)*:

“2.14 Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers.”

2. Unacceptable impact on the character of Drummond Street

You will see from the images in Appendix 2 that Drummond Street is characterised by a prevailing urban scale of three to four storeys. The importance of maintaining this distinctive scale is recognised on page 100 of the *Euston Area Plan (Jan 2015)* adopted in 2015 by Camden Council and the Greater London Authority² :

“Protecting and enhancing existing built character in the area [Drummond Street/Hampstead Rd] by:

² Page 6, para 3 of the *Euston Plan* advises that “The Euston Area Plan will be adopted by Camden Council as part of the formal development plan, and will also be adopted by the GLA as supplementary planning guidance to the London Plan.”

- *Protecting buildings and groups of buildings of historic character, and which make a positive contribution to the streetscape*
- *Maintaining and respecting prevailing building heights and scale. Where new infill opportunities emerge around Drummond Street/ Euston Street, the fine grain nature and limited scale of the area (three to four storeys) should be respected"*

The 4th para on page 9 of the Euston Plan also advises that:

"Proposals that do not meet the plan's aspirations will not be permitted"

More generally, policy D1a of the *Camden Local Plan (2017)* states that:

"Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:

a. respects local context and character:

....."

Mr [REDACTED] **objects** to the proposed development on the grounds that the proposed 8 storey development clearly does not maintain or respect the prevailing three to four storey building height and scale of Drummond Street and does not pay respect to local context and character. As such it is not in accordance with the *Euston Plan (2015)* or policy D1a of the *Camden Local Plan (2017)*.

In addition to these grounds of objection we also note the following omissions and deficiencies from the planning application:

- As stated above, the applicant has not submitted a **daylight and sunlight report** as required by *Camden Planning Guidance: Amenity (March 2018)* and is also missing a **Wind Impact Statement** and an **Acoustic Report**
- The application does not include the '**supplementary information template**' regarding the number of residential units required under question 16 on the planning application form
- The applicant has not submitted an **Accessibility Statement** or an **Affordable Housing Statement** which should be required for an application of this type under Camden's Local Area requirements
- We note that the applicant states in the Sustainability Statement that, "...The existing 600mm concrete transfer structure is re-purposed during construction works as a crash-deck to allow the **vehicular and pedestrian access to the Tolmers Square Estate to be retained throughout the works...**". The applicant does not show how this will be achieved. While we appreciate that further detail would be subject to approval in a Construction Management Plan, it is important to note that this entrance to the estate is the only access for large vehicles including those of the emergency services, so the existing full height and width access would need to be guaranteed throughout construction.
- The applicant makes various assertions in the Sustainability Statement about **the environmental performance of the proposed development which are not supported by any analysis or evidence**. For example, the applicant states that:
 - "Renewable energy technologies, such as photo-voltaic generation, shall enhance the enhanced building fabric performance"

- "The new residential re-development shall have a 19% CO2 reduction below Part L 2013 Building Regulations"
- "The re-development shall achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation."
- The **applicant has made no contact with Mr [REDACTED]** and to the best of our knowledge has made no contact with other neighbours who would be affected by the development. As you will be aware, para 3.7 of Camden Council's *Statement of Community Involvement (2016)* strongly encourages applicants to consult neighbours who may be affected by their proposals before they submit an application, especially where the proposals are likely to have a significant impact on the environment or on the local community, such is the case with the proposed development for 155 Drummond Street.

Mr [REDACTED] will respond to further information if and when it becomes available but on the basis of the current submission documents we urge the Council to refuse the planning application.

Please do contact me if you have any queries or would like to discuss any of the matters raised in this letter.

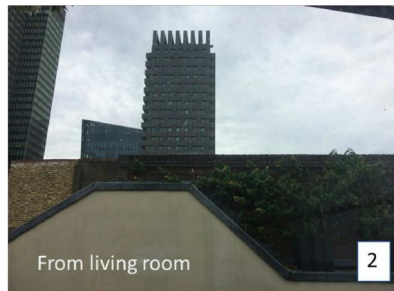
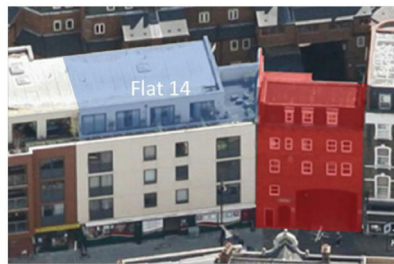
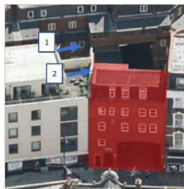
Yours sincerely,

[REDACTED]
[REDACTED]

Cc Regent's Park ward councillors:

Councillor [REDACTED]
Councillor [REDACTED]
Councillor [REDACTED]

APPENDIX 1 – DAYLIGHT OUTLOOK FROM FLAT 14



APPENDIX 2 – VIEWS SHOWING 155 DRUMMOND STREET IN CONTEXT OF PREVAILING BUILDING SCALE

