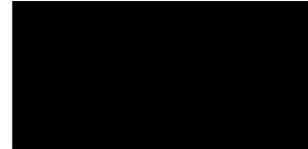


11 July 2019

WEA Planning

Regeneration and Planning

London Borough of Camden
Town Hall, Judd Street
London
WC1H 9JE



Dear Ms Nora-Andreea Constantinescu,

REF: Planning application 2019/1563/P for “Partial demolition of existing 4no. storey residential building and erection of 8no. storey building to include 5no x 2 bedroom and 1no x 3 bedroom self-contained flats, terrace and green roof at roof level, balconies across 5no levels on rear elevation; enclosure and conversion of existing footpath at ground floor level to lobby entrance to flats above” at 155 Drummond Street, London, NW1 2BP

We have been instructed by Proximity Building Ltd, the owners of the property at [REDACTED] to submit objections to planning application Ref 2019/1563/P. Our objections to the above proposed development are discussed below:

Principle of this development

The Council's Policy H1 (Maximising housing supply) states that where sites are underused, the Council will expect the maximum **reasonable** provision of housing that is compatible with any other uses needed on site. It is considered that multiplying the number of units by 3 is unreasonable and an overdevelopment of the site.

The site is also located within the Euston Area Plan which states the built heritage of Drummond Street must be protected.

The current application proposes an 8 storey block of flats which is completely out of character with the neighbouring properties and should be refused on this basis alone.

Design and Appearance

The Council's Local Plan **Policy D1** is entitled “Design” and states developments should respect the local context and character, integrate well with the surrounding streets and open spaces. In particular, the Council stresses that development of poor design that fails to take the opportunities available for improving the character and quality of an area will be resisted.

Policy D1 also outlines Camden Council's specific requirements for tall buildings. Proposals for tall buildings should be assessed by having particular attention to “*how the building relates to its surroundings*”.

The proposed building would be an 8 storey building positioned in the middle of a terrace of 4 storey properties. The development would clearly not relate well to its surroundings and would therefore conflict with the aims of Policy D1. There is no precedent in the street for 8 storey tall buildings and it would jar with the prevailing ridgeline.

The proposed development would be a harmful addition to the local area as a result of its size, design and siting. It would fail to preserve the character of the street and would have a detrimental impact on Drummond Street. In terms of its design and appearance, the structure will be incongruous. When looking at the submitted plans, it seems that the proposed building would be two times higher than the surrounding properties.

Our property [REDACTED] is a 4 storey mid-terraced building and the adjacent property is currently a four storey plus mansard residential building, as illustrated by the picture below. The buildings on the other side of the application site (nos. 159-163) also have four storeys with a mansard level, but appear as being one storey higher than the rest of the terrace due to a more generous floor to ceiling height internally.

Any proposal on Drummond Street should seek to respect the established character of the neighbouring properties. However, by not matching the scale and size of our property and the neighbouring buildings, the proposed block of flats would completely break the roofline on this part of Drummond Street which would harm the established character of the Drummond Street-Hampstead Road subarea as identified in the Euston Area Plan. The proposed building is therefore unacceptable and conflicts with the Council's relevant policies as mentioned above. It is our view that on design grounds the proposal should be refused.



Street view of [REDACTED] Drummond Street (left) and the adjacent application site (centre)
(Google Maps extract)

Camden Local Plan Policies Map (adopted June 2017) shows that the application site is located in the middle of protected views and lines of sight to and from Primrose Hill. With regards to protected views, Policy D1(r) states: *"All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to the relation between the building and hills and views"*

The proposed development fails to take those views into account and would clearly block the view to the most prominent parts of London and would have a detrimental impact on the attractiveness of London as a tourist destination.

Paragraphs 2.8 and 2.9 state that whilst the Council encourages high density for housing developments, such development must take into account *"all aspects of local character*

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including heritage assets, protected views and open spaces". Paragraph 7.31 also confirms that "The Council will take into consideration these protected views ... when deciding planning applications". As such, it is requested that this application is rejected by Camden Council in order to protect identified views and lines of sights in accordance with Policy D1 of the Camden Local Plan 2017.

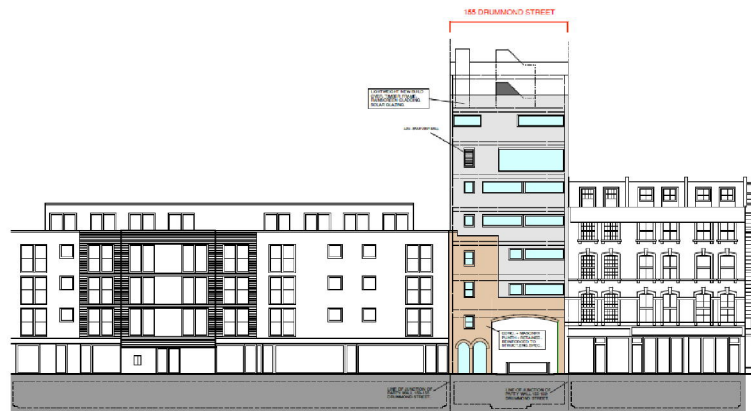
In terms of external finish, the description of the application contradicts itself and is highly misleading. Whilst the application form claims that the façade of the upper floors would be treated with "rain screen cladding", there are no details of the actual material that will be used. We consider that additional information is requested to fully assess the acceptability of the appearance of the proposed building.

The proposed fenestration of the proposal is also considered to be incongruous and completely out of character with the local area and the host building itself. While the host building and the neighbouring buildings have traditional sash windows, the architect proposes large sliding patio windows and long non openable windows which do not match the fenestration of the host building. The proposed design is considered unacceptable as it would not connect well to the host building and would not blend well into the local area.

To summarize, this application is completely out of keeping with the surrounding area and would severely detract from the character of the neighbouring properties. In particular, the proposed building would be twice as high as the property at No.141-153.

The lack of consideration for the design and appearance of the previously approved applications suggests that the applicant did not take into account the local environment when designing this scheme.





Front elevation as proposed

Impact on neighbouring properties

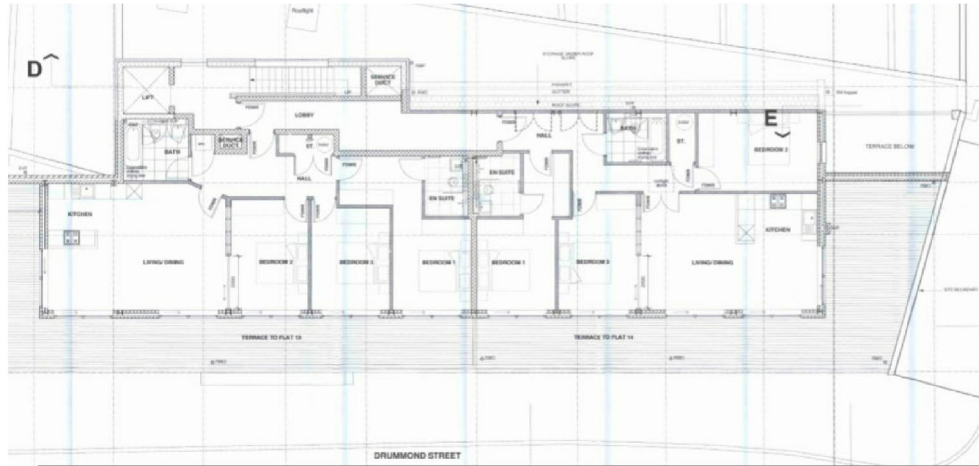
Regarding the impact of new development on neighbouring properties, the Council's Policy **A1** (Managing the Impact of development) is most relevant. The policy seeks to manage the impact of development on occupiers and neighbours by only permitting development that does not cause harm to amenity. When assessing proposals, the Council will focus on visual privacy, overlooking, outlook, overshadowing and sunlight/daylight and noise.

Camden's Planning Guidance on Amenity emphasises that where the height and design of a building can cause a loss of privacy, outlook and overlooking, the separation with the neighbouring buildings should be increased. As detailed below, there are some concerns with the impact of the proposed building. The proximity of this 8-storey building would be harmful to the surrounding properties and we believe that a significantly reduced proposal would be preferable. Any proposed building should be 4 storeys high to protect the appearance of the terrace.

The applicant did not provide any Daylight/Sunlight Assessment to demonstrate compliance with the BRE guidance and Policy A1 of the Local Plan. This is of great concern to us and leads us to believe that the proposal is in fact not compliant with these guidance and requirements.

At present Flat 14, on the top floor of our building benefits from a large roof terrace that provides its occupiers a good amount of private amenity, the terrace also provides natural daylight and sunlight into the bedrooms and kitchen-living room which also benefits from patio doors facing. One of the flat's bedrooms has its sole window facing 155 Drummond Street (see below). The scheme would involve erecting a 8 storey tower block located just a few metres from the windows serving the bedroom the kitchen, and the terrace. The proposed building would appear as a 8 storey high brick wall located in front the flat's windows and amenity space. The cumulative height, depth and proximity of the proposed building so close to our property would block the view and dramatically affect both sunlight and daylight received by the rooms to the west of the building and therefore harm the amenity of this part of the

property. The construction of the extension would indeed result in the erection of a brick wall less than 5m from the bedroom and living room windows – which are the only windows on this side of our property.



Plan showing the layout of the flats in relation to 155 Drummond Street

A further concern is the potential for occupiers of the proposed flats to directly overlook our property from the proposed balconies at roof terrace. The flats located on the 4th and 5th floors of the proposed building would have a balcony accessible from the flats' living rooms. Those balconies would allow any future resident to overlook directly into the terrace of the third and fourth floor flats at 141-153 Drummond Street, causing a significant loss of privacy for the occupiers of these flats.

In addition, the proposed top floor flats would have roof gardens with no screening indicated on the plans. We are very concerned with the clear loss of our residents' privacy that the block of flats would cause. In this regard the proposal is considered to be in direct conflict with the Council's relevant policies concerning the protection of amenity of neighbouring properties from development and it is our opinion that on these grounds alone the proposal should be refused.

Impact of local traffic

This application proposes the creation of 6 new dwellings with a block of flats, all of which would comprise of 2 to 3 bedrooms. All of the flats are likely to be occupied by families which would rely on cars for their daily activities, despite the availability of public transports in the local area. St John's Wood Park provides car parking to permit holders only and is already heavily parked with all available spaces being occupied as illustrated by the pictures below.

The applicant fails to provide any information about the impact of the development on the local traffic and whether the creation of additional flats would be harmful to the residents of

Drummond Street. A detailed Transport Statement would be needed to provide such crucial information



View of Drummond Street taken from the application site (dated March 2018)

Drummond Street is part of the Euston Area Plan and within close proximity to Euston Station. The construction of HS2 has a significant impact on the street and disruption the services along Drummond Street with the refuse collection being rescheduled to avoid the traffic and congestion caused by the construction. The construction of such a large development at 155 Drummond Street would further disturb the local traffic and could interfere with the free flow of traffic, including emergency vehicles (fire engines and ambulances). A Construction Traffic Management Plan would need required to ascertain that any development along Drummond Street would not cause undue congestion, especially since the residents are already suffering from the impacts of the construction of HS2. The cumulative impacts of several developments being constructed at the same time would harm the living conditions of the local residents, with the residents of our building being the most Impacted.

In terms of access, another concern is the lack of accessibility for disabled persons. The plans suggest that none of the proposed flats would be suitable for occupation by a wheelchair user. The application would not be compliant with Policy **H6** (Housing Choice and Mix) which requests that "10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3)."

Impact of construction

The application proposes works to the basement level, demolition of part of a building and construction of an 8-storey building next to our property. We are concerned with potential structural implication of such work onto our client's building. The demolition could destabilise the structure of the adjoining building. We are very concerned by the absence of a **Demolition and Construction Management Plan** to ensure that the proposed development would not harm the neighbouring building, in particular 141-153 Drummond Street.

Our client's property comprises of shops/retails units on the ground floor and flats in the upper floors and will be located directly adjacent to a large building site, with construction lasting several years. The construction process will produce high levels of noise which will be harmful to the residents of the flats as well as the staff and clients of the commercial units.

The construction of this 8-storey block of flats, which would also include the demolition of part of the building would also generate a lot of dust which would greatly affect our building. The neighbouring properties (including 141-153 Drummond Street) would be severely affected by the noise and dust caused by the construction, and it is requested that measures are introduced to control the emissions of noise, vibration and dust during both the construction and the daily use of the site once constructed, should planning permission be granted. Such measures should be closely enforced by Camden Council in order to protect our property and limit the harm caused by the construction on the daily life of the local residents and staff.

Conclusion

As owners of the adjoining property, our client's property would be the most impacted by the proposed development, the amenity and enjoyment of the living space in our flats will be substantially compromised as a result of this development. We are concerned that the height of the proposal will appear as an awkward addition to the street and be an over-development of the site. The building would appear unsympathetic in terms of its scale, siting and in no way preserves the character and appearance of the surrounding area. It would also result in a significant loss of privacy and of private amenity of the residents of 141-153 Drummond Street.

Finally, we feel that the construction of such large block of flats will result in an unacceptable impact on the availability of car parking in the local area and local traffic, to the detriment of the local community. For the reasons discussed we encourage Camden Council to refuse this application on the grounds that it is not compliant with the relevant Local Plan adopted and saved policies and guidance. There is no point in discussing suitable conditions at this stage as the current design is so unacceptable and should be refused without delay.

Yours sincerely,

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