



Mr Jonathan McClue
Planning Department
Camden Council
5 Pancras Square
London
NIC 4AG

2 September 2019

Dear Mr McClue

**OBJECTION TO PLANNING APPLICATION (REF. 2019/2879/P) AT
EASTMAN DENTAL HOSPITAL SITE AND BUILDINGS (INCLUDING
THE FORMER ROYAL FREE HOSPITAL, THE EASTMAN DENTAL
CLINIC, AND THE LEVY WING), LOCATED AT 256 GRAY'S INN ROAD
WC1X 8LD AND FRANCES GARDNER HOUSE, WREN STREET, GRAY'S
INN ROAD WC1X 0HD**

On behalf of our client, the New Calthorpe Estate Residents' Association, we formally object to planning application (ref. 2019/2879/P) at the above site.

Our objection focuses on the following four issues:

- impact of the construction of the development;
- impact of the completed new buildings on visual and residential amenity;
- crime and safety concerns; and
- the lack of any benefit to the existing residents from such a significant development.

The objection also sets out general concerns with the nature of the application and the engagement of the developer.

Background

The planning application relates to the development of the above site for a variety of new buildings in connection with its intended use as dementia and neurology research facility and separate educational space (Use Class D1). The development will include (but is not limited to):

- demolition of part of the former Royal Free Hospital (referred to as Plot 1 by the applicant) and erection of a new building which will be up to 7 storeys high (plus two basement storeys) in its place; and
- demolition of the Levy wing (Plot 3) and erection of a new building which will be up to 7 storeys high (plus one basement storey) in its place.

The New Calthorpe Estate is located to the north and east of the development site. The New Calthorpe Estate comprises low rise two storey residential dwellings located to the west of Cubitt Street, including Wells Square, Ampton Street and Sage Way. The latter of these comprise wardened homes for elderly residents.

Planning policy context

The national, regional and local planning policy relevant to the issues raised in this objection letter is set out below.

With respect to design and residential amenity, section 12 of the National Planning Policy Framework (the Framework) states the Government attaches great importance to the design of the built environment stating that good design is a key aspect of sustainable development. Paragraph 127(f) states that developments should:

“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

Policy 7.4 (Local Character) of the London Plan requires that development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. Policy 7.6 (Architecture) states that new buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.

Policy DI (London's Form and Characteristics) of the draft London Plan (with minor suggested changes) states that development proposals should ensure the design of places addresses a range of requirements, including to deliver appropriate outlook, privacy and amenity.

Camden Local Plan Policy AI (Managing the Impact of Development) sets out that the Council will seek to protect the quality of life of occupiers and neighbours, and will only grant permission for development if it does not cause unacceptable harm to amenity. The first bullet point to Policy AI sets out that Council will:

“seek to ensure that the amenity of communities, occupiers and neighbours is protected.”

With respect to crime and safety, paragraph 91 of the Framework states that planning decisions should result in places that are:

“safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.”

London Plan Policy 7.3 (Designing Out Crime) sets out that new development should reduce the opportunities for criminal behaviour, including that “routes and spaces should be legible and well maintained, providing for convenient movement without compromising security.”

Policy D10(B) (Safety, Security and Resilience to Emergency) of the draft London Plan sets out that development should include measures to design out crime.

Camden Local Policy C5 (Safety and Security) requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security.

With respect to community benefits, paragraph 3.6.6 of the draft London Plan sets out that:

“Masterplans and strategic frameworks should be used when planning large-scale development to create welcoming and inclusive neighbourhoods, promote active travel, enable the successful integration of the built form within its surrounding area, and deliver wider benefits to residents, such as access to shared amenity space and high-quality public realm.”

Planning policy at a national, regional and local level is clear that protection of the amenities of nearby residential properties is one of the most important considerations when assessing whether a development proposal is acceptable or not. If a development proposal has an adverse impact on the amenities of the adjacent or nearby occupiers, there will be conflict with the policies of the development plan. Such conflict must be afforded significant weight in the planning balance.

Similarly, preventing both the opportunity for crime and reducing the fear of crime are key considerations set out in planning policy.

Impact on the New Calthorpe Estate

The residents of the New Calthorpe Estate will be significantly affected by the proposed development, and this letter sets out the principal concerns, which relate to the following:

- impact of the construction of the development;
- impact of the completed new buildings on visual and residential amenity;
- crime and safety concerns; and
- the lack of any benefit to the existing residents from such a significant development.

Construction impacts

The draft Construction Management Plan and Construction Logistics Plan (outline) submitted with the application sets out that the build duration of the construction of the development will be 319 weeks. This is over six years. For Plot 1, this will involve the following:

- an initial 40 week period for enabling works and demolition of the former Royal Free Hospital (the Alexandra wing would be retained);
- this will be followed by a 95 week (i.e. nearly 2 years) period for piling and construction of the sub- and superstructure; and
- the construction of the building envelope, fit out and close out will then take place over a 75 week period.

Including demolition, the works for the delivery of Plot 1 will take 208 weeks (i.e. 4 years).

Once the works to Plot 1 are completed, the programme anticipates that the works to Plot 3 will commence. This will involve the following:

- an initial 12 week period for enabling works and demolition of the Levy wing;
- this will be followed by a 49 week (i.e. nearly 1 year) period for piling and construction of the sub- and superstructure; and
- the construction of the building envelope, fit out and close out will then take place over a 57 week period.

Including demolition, the works for the delivery of Plot 2 will take 111 weeks (i.e. over 2 years).

The residents of the New Calthorpe Estate will be subjected to significant impacts over a prolonged period of time to enable the development to proceed. These impacts will, have a direct and unacceptable impact on the amenities of the residents. The noise, disturbance and nuisance of living in immediate proximity to a large building site over a protracted period of time cannot be under estimated. It is also noted that the application documents are inconsistent on the timing for the demolition, with drawing number BEMP-HBA-SW-ZZ-DR-A-08-1101 indicating that demolition of the Levy wing would take place under the first 'phase' of the development. Such a discrepancy needs to be investigated by the Council and the position made clear before planning permission is granted.

With respect to noise specifically, chapter 4 of the Environmental Impact Assessment (EIA) Volume 1 - Environmental Statement (ES) Main Report relates to noise and vibration. Figure 8.2 of this sets out the 'Noise-Sensitive Receptor Locations.' 3 blocks of the New Calthorpe Estate are identified, and these are:

- R2 - block containing 5 to 12 Wells Square;
- R3 - block containing 17 to 19 Fleet Square; and
- R4 - block containing 7 to 16 Fleet Square.

Table 8.3 of the ES Main Report sets out that where the noise level is at or exceeds 70 decibels (dB LAeq,T), the magnitude of the impact is 'high' and the adverse effect level is classified as a Significant Observed Adverse Effect Level (SOAEL). Paragraph 8.21 defines this as:

"the level at which noise causes a change in behaviour and/or attitude, such as avoiding certain activities during periods of intrusion or, where there is no alternative to ventilation, having to keep windows closed most of the time because of the noise."

Table 8.12 of the ES Main Report sets out that the demolition works would involve noise levels at the above receptors of 71 dB for R2, 77 dB for R3 and 75 dB for R4. These are all classified as 'major adverse.' The construction of the substructure for Plot 1, which will take 75 weeks, will result in noise levels of 74 db, 78 db and 75 dB for R2, R3 and R4 respectively. For the 20 week period for the superstructure, these numbers will be 72 dB, 76 dB and 75 dB. For the following 75 week period of the construction of the building envelope, fit out and close out of Plot 1, the noise levels will not be as high, but are still in the 'moderate

adverse' classification, except in relation to the external works and R3, where the levels will reach 75 dB (and so have a major adverse effect).

The works for the demolition of the Levy wing and the construction of Plot 3 will have similar, if slightly reduced, noise effects. There will still be a major adverse impact upon R3 and R4 for the piling and construction of the sub- and superstructure period (49 weeks).

Chapter 7 of the ES Main Report sets out the potential air quality impacts. The principal concern of the residents of the New Calthorpe Estates is the demolition and construction activities that will take place over a 6 year period. Paragraph 7.86 of the ES Main Report states that:

“The demolition and construction works will give rise to a risk of dust impacts during demolition, earthworks and construction, as well as from trackout of dust and dirt by vehicles onto the public highway.”

The 'Potential Dust Emission Magnitude' from the demolition and construction of the development, based on chapter 7 of the ES Main Report (and appendix) is as follows:

- total building volume is approximately 50,000 cu m, with the height of buildings to be demolished ranging between 10 and 22.5 m;
- approximately 10,000 tonnes of material will be removed as part of the demolition;
- the site covers approximately 9,000 sq m and most of this will be subject to earthworks, will include the excavation to create a two storey basement for Plot 1 and a single storey basement for Plot 3, and will involve the movement of approximately 60,000 tonnes of material;
- the construction will involve piling; and
- during the peak demolition and construction period (likely to be April and May 2021) approximately 60 HGVs will access the site, potentially over a dusty surface material and so may track out dust and dirt.

The ES Main Report confirms that for all four categories - demolition, earthworks, construction and trackout (vehicles accessing and leaving the site) - the Potential Dust Emission Magnitude is 'large' (based on a scale of small, medium and large).

The ES Main Report acknowledges that the residential properties of the New Calthorpe Estate are classified as a 'high' sensitivity receptor and that there will be a medium risk to human health as a result of this.

No account has been made in the application documents of the communal boiler facility that is adjacent to the boundary wall - the boiler was rebuilt recently at great expense and this serves 104 households (including the vulnerable residents of the Wardened homes on Sage Way). There is a strong concern that vibrations from demolition and basement excavation could disrupt its functionality. This should be properly assessed and considered by the Council. An appropriate management plan and mitigation strategy to prevent this must be put in place before any works start on the development (and be enforced by a Grampian style planning condition). If the construction of the development results in any damage or

disruption of supply (which would have serious consequences to the vulnerable residents), compensation will be required.

Visual and residential amenity impacts

The visual and residential amenities enjoyed by the residents of the New Calthorpe Estate encompass a range of factors. The Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment – Third Edition (April 2013)' defines visual amenity as *"the overall pleasantness of the views they enjoy of their surroundings."* The 'Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (March 2019)' by the Landscape Institute sets out that 'Residential Visual Amenity' means:

"The overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage."

With respect to outlook, this forms part of the visual amenity enjoyed by occupants when looking out of their windows of their properties and from spaces such as gardens or terraces. The quality of one's outlook varies and is informed by the character of the setting in which it is based.

The Planning Portal contains a glossary of planning terms. Whilst these are not statutory definitions, they are a useful guide for understanding the context of words used in connection with planning applications and related matters. The Planning Portal identifies 'amenity' as being:

"A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity."

The 'view' of the rear of the former Royal Free Hospital is, it is accepted, not one that is particularly appealing, but it is well established (i.e. it predated the development of the New Calthorpe Estate) and 'neutral' in terms of its impacts. Importantly, the scale of the building at only 4 storeys and the distance it is set away from the boundary with the New Calthorpe Estate help to mitigate the impact in terms of overshadowing, overlooking and the general outlook. Photos 1 to 3 below seek to indicate this.



Photo 1 - view of the former Royal Free Hospital and Levy wing from Seddon Street (source: Julie Riley)



Photo 2 - view of the former Royal Free Hospital from Seddon Street (source: Julie Riley)



Photo 3 - view of the former Royal Free Hospital from Fleet Square (source: Julie Riley)

The proposed development will result in a significant change to the outlook from the New Calthorpe Estate. The applicant's Townscape and Visual Impact Assessment (TVIA), which forms part of the ES, does not include a view from within the New Calthorpe Estate. View 16 is along Seddon Street, but is taken from further back than the above photographs with 15 Cubitt Street in the foreground. There is, therefore, no appropriate assessment of the impact within the ES in visual and townscape terms on the New Calthorpe Estate.

It is clear that the proposed 7 storey high development upon Plot 1 will have a significant impact on the New Calthorpe Estate in visual terms and with respect to overshadowing and overlooking.

It is relevant that there is a change in levels between the application site and the New Calthorpe Estate, and the information provided within the application documents does not properly indicate this. Drawing number BEMP-HBA-P1-ZZ-DR-A-20-1303 provides a section through the Plot 1 building but does not indicate properly the change in levels to the New Calthorpe Estate buildings. Drawing number BEMP-HBA-P3-ZZ-DR-A-20-1300 does not indicate the relationship of Plot 3 with the New Calthorpe Estate at all. Other application documents indicate that the difference in the site levels is approximately 4.45m - this is a significant in terms of the additional height that will be created by the development.

With respect to Plot 1, the key changes between the existing building and what is proposed are:

- an increase in height of 11.6 m (from 23.3 m to 34.9);

- an increase in width of 12.6 m (from 47.0 m to 59.6 m); and
- the rear building line will be just 6.7 m from the boundary with the New Calthorpe Estate, compared to 16.6 m for the existing building (a reduction of 9.9m and based on the 'main' elevation of the building, i.e. it is accepted that the 'outrigger' is closer).

This will result in a building that is larger in both height and width, and closer to the New Calthorpe Estate. The proposed building is also be 'bulkier' having 2 larger elements that stand out; this is described as 'greater solidarity' in the lower brick facade in the Design and Access Statement (paragraph 5.3.12).

The existing Levy wing of the Eastman Dental Hospital currently has a limited impact with respect to the New Calthorpe Estate. Due to the layout and orientation of the Levy wing, there is only one small elevation that sits in close proximity to the New Calthorpe Estate boundary. This elevation measures 12.1 m in height and 13.4 m in width. In contrast, the development of Plot 3 will result in the following:

- a 4 storey element in close proximity to the New Calthorpe Estate which will be 17.3 m high (an increase of 5.2 m);
- a further 3 storeys set back from the New Calthorpe Estate, leading to a total height of 28.4 m (and so an overall increase of 16.3 m); and
- the width of the elevation closest to the New Calthorpe Estate of 20.4 m (an increase of 7 m).

The distance between the rear (east) elevation of Plot 1 and the north elevation of Plot 3 will be just 8.5 m.

Photo 4 below indicates the relationship of the current building from the end of Seddon Street. The effect of the proposed development will result in 2 large buildings being constructed in very close proximity to the southern and western boundary of the New Calthorpe Estate. The proximity of the 2 buildings to each other will mean that they will effectively read as one when viewed from the New Calthorpe Estate, and the result of this will be an overly dominant and overbearing from of development. This dominance and loss of outlook will have a direct and irreversible impact on the residents of the New Calthorpe Estate and result in a significant loss of residential amenity.



Photo 4 - view of the former Royal Free Hospital from end of Seddon Street (source: Julie Riley)

Paragraph 20.3 of the Planning Statement claims that the proposed development would not result in “*any unacceptable effects on privacy.*” The applicant claims that this is achieved through the varied angle of the fins on the elevations around the building. Whilst this design is noted, it remains the case that the proposed development would result in a large building in close proximity to the eastern boundary (of the site) with a large number of windows. The proposed floor plans indicate that the windows would serve a large open plan primary lab where dozens (if not more) people would be working on each floor. This would create a perception of being overlooked and a consequent loss of amenity to the New Calthorpe Estate residents.

It is also the case that the current north of the elevation of the existing building has only a limited number of windows. The proposed development will have a full elevation of windows that will provide a view, albeit an oblique one, to the New Calthorpe Estate. As a minimum, this will create a sense of being overlooking. Residents of New Calthorpe Estate, especially those closest to the development site, are also concerned that the proposed development will result in a loss of amenity to them through increased overshadowing and so a loss of daylight and sunlight. Chapter 10 of the applicant’s ES Main Report assesses this, having regard to ‘Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight 2011, A Guide to Good Practice, Second Edition (2011)’. Paragraphs 10.17 and 10.18 of the ES Main Report set out that for the measurement of daylight impacts the following has been used:

“Vertical sky component (VSC) is a ‘spot’ measure of the skylight reaching the mid-point of a window from an overcast sky. It represents the amount of visible sky that can be seen from that reference point, from over and around an obstruction in front of the window. That area of

visible sky is expressed as a percentage of an unobstructed hemisphere of sky, and, therefore, represents the amount of daylight available for that particular window.

No-sky line (NSL) is a measure of the distribution of diffuse daylight within a room. The NSL simply follows the division between those parts of a room that can receive some direct skylight from those that cannot. If from a point in a room on the working plane (a plane 850 mm above the floor) it is possible to see some sky then that point will lie inside the NSL contour. Conversely, if no sky is visible from that point then it would lie outside the contour.”

The ES Main Report sets out that the proposed development will have the following impacts:

- 7 Fleet Square - 2 of 4 windows will fall below the BRE guidance for NSL, with an up to 29.9% reduction for one and an 39.9% reduction for the other;
- 8 Fleet Square - 2 of 4 windows will fall below the BRE guidance for NSL, with an up to 39.9% reduction for one and a reduction of greater than 40% (the highest impact) for the other;
- 12 Fleet Square - 3 of 7 windows will fall below the BRE guidance for VSC, with an up to 29.9% reduction for these;
- 13 Fleet Square - 5 of 7 windows will fall below the BRE guidance for VSC, with an up to 29.9% reduction for these;
- 14 Fleet Square - 6 of 7 windows will fall below the BRE guidance for VSC, with an up to 29.9% reduction for these;
- 15 Fleet Square - 6 of 7 windows will fall below the BRE guidance for VSC, with an up to 29.9% reduction for these; and
- 16 Fleet Square - all 7 windows will fall below the BRE guidance for VSC, with an up to 29.9% reduction for 2 of these and an 39.9% reduction for the other 5.

The ES classifies the overall effect of the development on these properties as ‘minor adverse.’ However, the BRE guidances indicates that a 30-39.9% alteration in daylight should be considered as having a ‘moderate’ effect, and a 40% of greater reduction should be considered as a ‘major’ effect.

In our view, the impact on at least 2 of the properties, 7 and 16 Fleet Square, should be considered as being subject to a moderate and major adverse effect respectively. Furthermore, whilst the scale of the VSC reduction in 13, 14 and 15 Fleet Square is in the 20-29.9% category, it is also relevant that in each of these properties the majority of the windows are effected (and in the case of 16 Fleet Square, all of the windows are effected).

For the impact on sunlight, paragraph 10.19 of the ES Main Report sets out that:

“Annual probable sunlight hours (APSH) is a measure of sunlight that a given window may expect over a year period. The Building Research Establishment (BRE) guidance recognises that sunlight is less important than daylight in the amenity of a room and is heavily influenced by orientation. North facing windows may receive sunlight on only a handful of occasions in a year, and windows facing eastwards or westwards will only receive sunlight for some of the day. The BRE guidance states that only windows with an orientation within 90 degrees of

south need be assessed. Therefore, in terms of sunlight, only rooms facing south are assessed for APSH as north facing rooms will not receive direct sunlight.”

The ES Main Report sets out that the proposed development will result in a 40% or greater reduction in winter APSH for at least one window to the following properties in the New Calthorpe Estate: 3, 4, 5, 6 (this property will have 2 windows effected), 7, 8, 9, 11, 12, and 16 Fleet Square. These impacts are classified as minor adverse by the ES.

Crime and safety concerns

As a Tenants and Residents Association, New Calthorpe Estate has worked with the Council, Police and other bodies to try and minimise the level of crime and anti-social behaviour in this area. The application proposes to create a new pedestrian and cycle link between Gray's Inn Road on the west of the site through to Cubitt Street on the east; this will run parallel to Seddon Street to the immediate south of the New Calthorpe Estate. Whilst laudable in its aims residents of New Calthorpe Estate are concerned that this will instead create an opportunity for crime and anti-social behaviour. This has the potential to undue the work undertaken to improve the area.

Benefits to local residents

The New Calthorpe Estate is the closest residential area to the development site, being immediately adjacent to the northern and eastern boundaries, where the new larger buildings will be sited. The residents will be the most affected by the development, both in terms of the minimum 6 year construction period and thereafter from the proximity of the buildings to the estate. However, despite this, the development will not result in any direct or tangible benefits to the residents. The references in the application documents to local employment opportunities are noted and welcome, but there is nothing to suggest that these would be linked to residents of the New Calthorpe Estate; in reality, the temporary and permanent jobs that would be created would cover a much larger geographical area. Even if some of the residents of the New Calthorpe Estate did benefit in this regard, this would be very limited in terms of the overall harm that would be caused.

General comments

This development needs to also be considered in context with the wider area. Many from New Calthorpe Estate were opposed to the development of the Mount Pleasant site, with particular concerns that it turned its back on the local community whilst causing harm to the local community and providing little if no benefit. The current application professes to be different and to want to work in harmony with the existing community, but the design and the process thus far suggests otherwise.

The residents of the New Calthorpe Estate accept that there has been some engagement by the developer - a walkabout of the New Calthorpe Estate with residents and a representative of the developer and the architect took place in October 2018. However, this has not, in the view of residents, translated into meaningful action on the developer's part. Indeed, the October 2018 site visit highlighted the concerns of the proximity of the boiler room and the potential for the development, in particular the excavation of the basements, to have a significant impact on this. It is also a missed opportunity to work with

the residents to link into this existing system. We understand that Great Ormond Street Hospital and the Crick Institute have linked their renovated/new Combined Heat and Power generation to supplying housing in their vicinity. Planning policies (in particular 5.5 of the London Plan and CCI of the Local Plan) are supportive of decentralised / shared heating network arrangement.

The New Calthorpe Estate residents are also concerned that it has never been fully explained as to why the development of Plot 1 needs to be in the configuration (i.e. layout and size) proposed. We have reviewed the Feasibility Options Appraisal report submitted with the planning application and in our view this does not clearly justify why this option was pursued and why proper alternatives were discounted. Further work on this needs to be undertaken by the applicant to justify this approach.

The residents of the New Calthorpe Estate have reviewed the objections made by the Mount Pleasant Forum and the Calthorpe Community Garden and wish it to be placed on record that they are fully supported.

Conclusion

The applicant's position, as set out in paragraph 23.17 of the Planning Statement, is that the proposed development would not have unacceptable adverse effects on the amenities of local residents in terms of visual privacy, outlook; sunlight, daylight and overshadowing; they consider that the application would be in accordance with Policy A1 (Managing the Impact of Development) of the Camden Local Plan.

The analysis set out above demonstrates that this is not the case. The proposed development would have an adverse impact on the amenities of the residents of the New Calthorpe Estate. The 6 year construction period would involve significant periods of time where noise levels would exceed 70 dB. The applicant's ES confirms that the magnitude of the impact of this would be 'high' and the adverse effect level is classified as a Significant Observed Adverse Effect Level (SOAEL). The result of this would be a major adverse impact.

There is significant concern that the development of the site, which includes a two storey below ground basement, will cause damage to the communal boiler facility that is adjacent to the boundary wall. As a minimum the residents require that an appropriate management plan and mitigation strategy to prevent this must be put in place before any works start on the development (and be enforced by a Grampian style planning condition).

The residents of the New Calthorpe Estate have previously experienced development taking on the boundary of the estate in the form of the construction of Frances Gardner House. The construction of this building was not a positive experience for the residents and there is no reason to believe that the much larger development being proposed in this application will be any different; indeed, the fear is that it will be substantially worse.

The finished development would result in a loss of amenity of the residents of the New Calthorpe Estate by virtue of the 2 new imposing buildings to be constructed on Plots 1 and 3 (which in reality would have the effect of appearing as one larger building due to their proximity to each other). This loss of amenity would occur through a diminution in outlook, creating an overly dominant and overbearing impact and a loss of daylight and sunlight to

those properties closest to the site. There is a significant difference in levels between application site and the New Calthorpe Estate, with the latter being approximately 4.45m lower. This difference in height will exacerbate the impacts of the proposed new buildings.

In addition to the impact on amenity, residents of the New Calthorpe Estate are also concerned that the proposed link from Gray's Inn Road to Cubitt Street running adjacent to Seddon Street would have the potential for an increase in crime and anti-social behaviour. At the very least, it would result in an increased fear and perception of crime. Residents are also concerned that the scheme would not result in any direct or tangible benefits to them from the significant development proposed.

On this basis, the New Calthorpe Estate Residents' Association OBJECTS to the proposed development. The above concerns may be able to be addressed but significant design changes will be required to be made to the scheme, consisting of:

- a significant reduction in scale of Plots 1 and 3;
- altering the location of these buildings to move them away from the northern and eastern boundaries;
- reducing the construction period; and
- removing the link from Gray's Inn Road to Cubitt Street.

Yours sincerely

ANDREW RYLEY MRTPI

On behalf of DLBP Ltd

