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3 Somerton House  
Duke's Road  
London WC1H 9AA

Planning and Built Environment  
London Borough of Camden Council  
5 Pancras Square  
London  
NIC 4AG

8 December 2019

For the attention of Ben Farrant, Planning Officer

RE: application reference number: 2019/5214/P

*Erection of a two-storey roof top extension and a seven-storey annexe extension to existing hotel (Use Class C1); formation of ground floor restaurant (Use Class A3); together with alterations to the external appearance, access, plant, car parking and associated works (total uplift 2990sq. m)*

Dear Sir

I write in connection with the above planning application. I have examined the plans and I know the site well having lived in Flat 3 Somerton House for 19 years. I wish to object strongly as this proposal will cause an unacceptable harm to amenity for me, my family and other Somerton House residents and as such permission should not be granted in line with Policy A1 of the Camden Local Plan 2017. The reasons for my objection are as follows:

## **Loss of daylight and overshadowing**

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The flats on the east side of the building are already dark as they benefit from no direct sunlight. My flat is very dark and I have to use a number of SAD lights to make it livable in the day. The excessive bulk of the extension in such close proximity to Somerton House will obviously have a detrimental impact on the levels of daylight received by in the affected homes, but especially mine.

The windows in flats 3, 11 and 20 are also obstructed by the rear fire escape structure which is approximately 1m away from the living room window, making these rooms even darker. This obstruction is not mentioned in the applicant's Day and Sunlight report, and there are further issues with that document.

It states: "3.7. Where floor plans not been obtained, we have used reasonable estimates as to the room dimensions behind each fenestration. Typically, unless building form dictates otherwise, a 4.2m deep room is used for residential properties."

The living areas in flats 2, 3, 10, 11, 19 and 20 are 6m deep from the illuminated end. This means conclusions in the report are based on incorrect assumptions.

The D&S report assess rooms on the 6th and 7th floors of Somerton House only. Although the application states that it is a 2-storey roof extension, the total height is the same height as 3 floors of Somerton House as is clear from the plans. This means the 8th floor flats should have also been included in the assessment but were omitted.

The Daylight and Sunlight report states that Somerton House: "will experience some VSC reductions should the Proposed Scheme be implemented, we are of the opinion that the daylight to the rooms will be uncompromised overall." Given no homes in Somerton House were visited for the Daylight and Sunlight Report, and incorrect assumptions were made because of this, it's conclusions should be discounted.

An issue as subjective and important as the effect of light loss on the habitability of a home should not be based on the incorrect assumptions of those who have never been in the homes affected. Until such time as this issue has been independently and holistically assessed this proposal should be rejected under Policy A1(f).

## **Loss of outlook**

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If this proposal goes ahead my flat will be entombed by it, blocking outlook in 2 directions. As is clear from Figure 3 my home will be enclosed, making it feel – and look – like a prison. I don't currently have an 'attractive view' as there are two unattractive buildings in the way. But for the 20 years I have lived here I have enjoyed the long lines of vision to the east and the north, which make the flat feel open and less confined. I believe this sense of enclosure will have a detrimental effect on my families ability to enjoy our home life, and a negative impact on our mental health.

This loss of outlook will be inflicted on 9 homes at Somerton House, dramatically reducing amenity, against the stated aims of Policy A1 of the Camden Local Plan 2017.

## **Loss of privacy**

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Should this plan go ahead hotel guest and workers will be able to stare directly into my bedroom, kitchen and living room. This is clear from figure 3. This will make my home like a goldfish bowl.

Flats on the east side of the building are currently overlooked from a distance. However the windows in the proposed are much closer meaning much more intrusion as people will actually be able to see clearly into my home.

## **Increased odour and fumes**

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The fumes from the hotel kitchen extractor fan are currently vented at ground level into the service yard. This frequently causes the smell of burnt grease to enter residents homes, and is noticeable even up to the ninth floor.

The proposal indicates that the fumes from the enlarged "Chop and Block" would similarly be discharged into the service yard. Obviously a bigger, busier restaurant will create more fumes which would be discharged into a much tighter enclosed space. This would funnel the fumes even more directly into residents homes. This represents a loss in amenity as prohibited by Policy A1(k).

## **Noise and Vibration levels**

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The incredibly tight turning circle proscribed by the proposal will inevitably lead to vehicles performing multiple-point turns directly underneath residents' windows. This will lead to increased noise from engines and reversing sirens and increased exhaust pollution. The new extension creates a tight confined inner courtyard which will funnel the increased noise and pollution up into residents' homes.

I'm sure the applicant's RAC's vehicle sweep plans are feasible on paper. However, in order for them to be executed successfully the driver would need to follow the proscribed path very accurately every time. This is improbable. This would therefore lead to extended periods trying to maneuver in the in the service yard, leading in turn to increased noise pollution and vibrations from engines and reversing sirens

## **Effect on Bloomsbury conservation area**

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The proposed extension will be clearly visible from within the Bloomsbury conservation area (see figures 6 & 7) and is not in keeping with the character of the area. Policy DP25 (d) of Local Development Framework, Camden Development Policies 2010–2025, states: "The Council will... not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area".

## **Effect on Euston Road**

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While the cosmetic improvements to the street-level Euston Road facade are welcome and long-overdue, adding to the height of the building will have an imposing and detrimental effect on the area making it more enclosed and trapping vehicle pollution. The cosmetic cladding proposed is a cheap, modish way to hide and unattractive box. No real architectural effort has been made to improve the overall look of an unappealing building. It is not in keeping with, nor does it add to the character of, the area. It will add to the noisy wind-tunnel effect and make an already unpleasant area even worse.

## Reduced Fire Tender Vehicle access

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The current service yard is designed to accommodate all types of fire service vehicles safely in order to tackle a blaze at the east side of Somerton House and the hotel underneath it, the south side of the hotel and the rear of The Place dance studio next door.

The proposal allows a small fire vehicle (7.9x2.5m) to access the reduced surface area of the yard. A very tight 4-point turning circle is described in the DSMP (p25). This would place the vehicle being directly underneath a potentially burning building should it need to get into the service yard to fight a fire.

Post-Grenfell and with the Hackitt review on-going, any plan which restricts Fire vehicle access in this way must be rejected.

## Loss of residential amenity due to reduced service yard size

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The service yard is a space shared by Whitbread and Somerton House residents. Residents who rent any of the 4 parking spaces or 8 garages have the right to drive to their spaces without impediment. Cyclists and pedestrians from Somerton House have the right to walk through service yard (see plan A ) in safety. As there is no loading or unloading on Duke's Road this is where all deliveries to residents and the hotel should come.

The proposal reduces the area of the delivery and refuse bay by over 50%, leaving just enough room for 1 small van to get in and out.

Should another vehicle arrive at the same time there will not be room for it to turn round and it will be forced to reverse up the ramp onto Duke's Road. This is dangerous and unacceptable.

Paragraph 6.1.9 of Whitbread's DSMP says "a site-specific delivery schedule will be prepared in order to ensure deliveries do not overlap and hence ensure only one delivery vehicle is present on-site at any given time". It does not mention how this will be achieved in reality where delivery schedules are very easily disrupted.

Even with the best planning in the world delays with deliveries and on roads and are inevitable, which will inevitably lead to two or more vans arriving at the same time and one or more being forced to reverse up the ramp.

For 20 years Whitbread has repeatedly told residents that they can't control when or how their deliveries arrive. Residents have been forced to contact haulage companies themselves to try to address delivery issues such as time and noise. (see note 3.5)

### Somerton House refuse collections

Both the Transport Statement and the Delivery and Service Plan state:

*"With respect to residential refuse collections generated by Somerton House... Whitbread will seek to limit simultaneous delivery / refuse vehicle arrivals with residential refuse collections as far as reasonable."*

This is an acknowledgment that it will not be able to "limit simultaneous delivery" because Whitbread has no ability or right to control third-party delivery times. As such simultaneous delivery will be an unmanageable ongoing issue, again leading to dangerous reversing up the ramp.

## Lack of need

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Whitbread currently owns 101 hotels in London with 1000s of rooms. Samplings from their booking website taken in July and November (Figure 11) this year show that while PTI Euston Road is sometimes fully booked other PTIs nearby have availability. Whitbread's proposed new site in Camden town will mean even greater availability at PTI Euston.

PTI's constant expansion is inevitably at the expense of local independent hotels in the area and LBC should be encouraging more boutique offerings rather than budget homogeneity. Camden generally and Bloomsbury in particular has a special and unique character – adding more of the same neither protects or enhances the area.

PTI does not need to expand further at the expense of Camden residents.

## **Loading bay position**

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Positioning the laundry and refuse storage areas on the opposite side of the residents' access route from the vehicle loading bay meant that cages of laundry and rubbish bins will have to be pushed along the access route, causing it to be blocked (see figure 12).

The positioning of the bin and laundry storage areas will encourage vehicles to park in pos A, figure 12, as this will shorten the distances they need to move the bins and cages, thereby saving valuable time.

The applicant has a long history of blocking access (see figures 9) and despite constant protest from residents the problem is currently as bad as it always has been (see figure 10), Any proposal affecting the shared service yard should be designed to address the issue of access blockage rather than exacerbating it.

## **Telecommunications infrastructure**

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The application makes no mention of the telecommunications equipment currently on the roof. Whitbread makes money renting their roof space out to communications companies – there are currently 9 mobile phone mast, 3 satellite dishes and 3 equipment boxes, all of which are visible from street level and residents' homes.

In 2007 Whitbread installed a noisy air conditioning unit 9m away from residents homes. They did this without planning permission or consulting with residents. After years of protests from residents Whitbread finally addressed the noise issue but then installed more air con plant (this time with an application: 2010/4113/P) the noise from which still plagues residents to this day. We have been trying unsuccessfully to get Whitbread address these issues but to little avail.

This illustrates how little the applicant considers residents when making business decisions, and how slow it is to respond to situations that effect us. It also demonstrates Whitbread's cavalier attitude to planning law.

When asked at a meeting on 4.12.19 what plans they had for the repositioning of this infrastructure said that they didn't have one at this time. My concern is that the masts, aerals and boxes will be moved onto the car-park extension roof – further restricting light and outlook from flat 3 – or they will be placed on the roof, further impacting the view from the Bloomsbury Conservation area.

Without detailed plans for the repositioning of this equipment surely this proposal cannot be approved.

## **Effect on local community**

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I have been in contact with representatives from The Place dance school next door and they are concerned that if this development goes ahead it may put them out of business. Their rehearsal and performance spaces are directly next to the proposed construction site and will be completely unusable while building works are being carried out.

## **In Conclusion**

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LBC should reject this proposal as it will causes unacceptable harm to amenity for many residents in Somerton House. Factors include but are not limited to:

- visual privacy, outlook
- daylight and overshadowing
- noise and vibration levels
- odour, fumes and dust

Our neighbour The Place, an internationally renowned art institute may be forced to close if this plan goes ahead.

The proposal will have a negative impact on the Bloomsbury Conservation Area.

Policy A1 Managing the impact of development states “The Council will seek to protect the quality of life of occupiers and neighbours.” and I would ask that it do so in this case and reject this application.

## **Background on Somerton House residents**

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Somerton House is currently home to a community of 68 people – 16 children and 53 adults, of whom 7 are elderly. The number of children will soon rise to 18, as 2 of the adults are currently pregnant.

As a council building, many of the residents are vulnerable and were given homes here because of health issues:

- 12 residents live with physical disabilities
- 15 residents live with mental health disabilities
- 3 live with autism
- 4 are currently being treated for cancer
- 2 are severely visually impaired
- 7 have hearing issues
- 5 can be described as highly vulnerable

Most residents are long-term with 16 of the 32 flats having been occupied by the same tenant for more than 10 years. 1 resident has lived in the building since it was first built in 1965 and 1 resident was born here in 1972 and still lives here today.

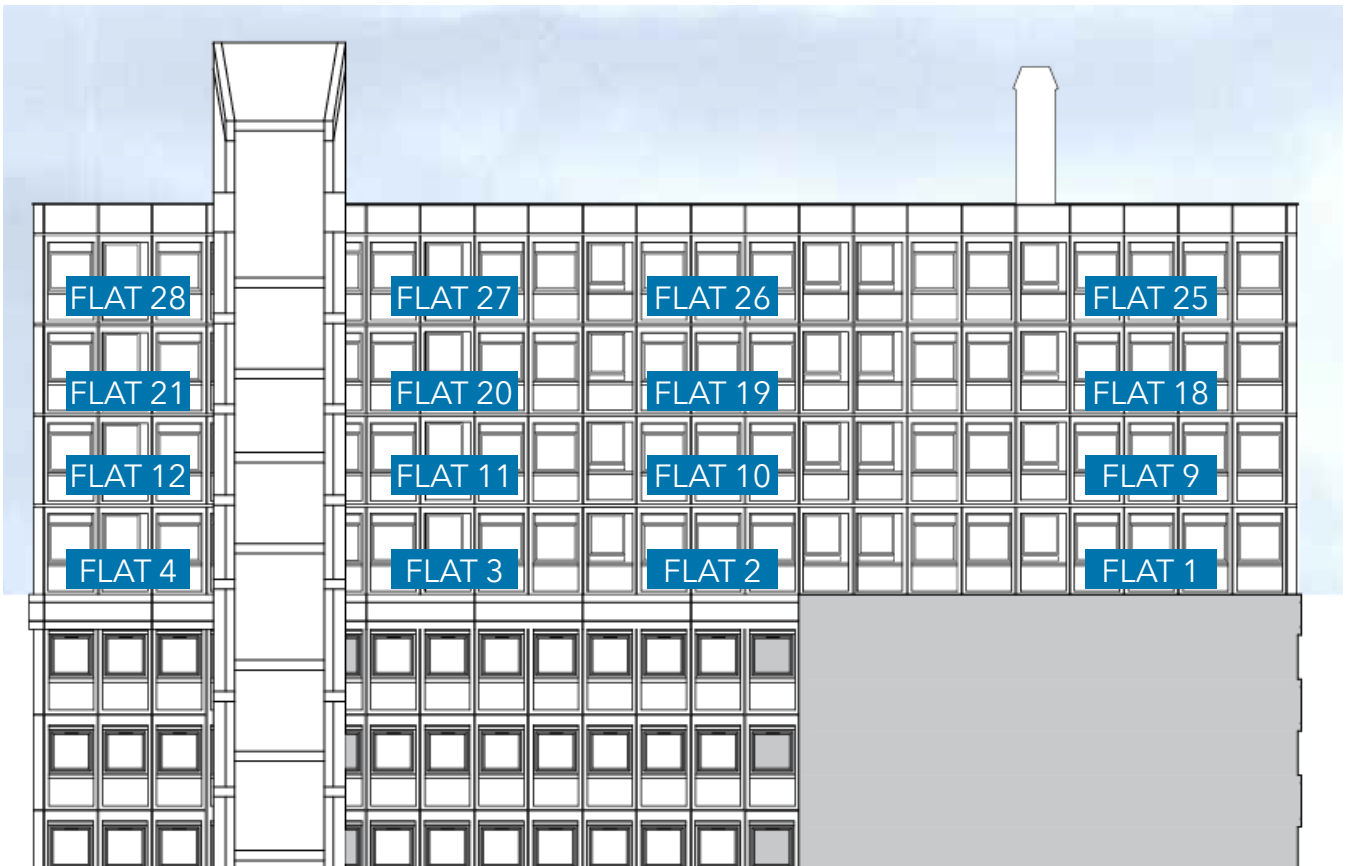


Figure 1. Flat numbers identified - windows effected and height of extension illustrated



Figure 1. View from Flat number 1, home of a young family

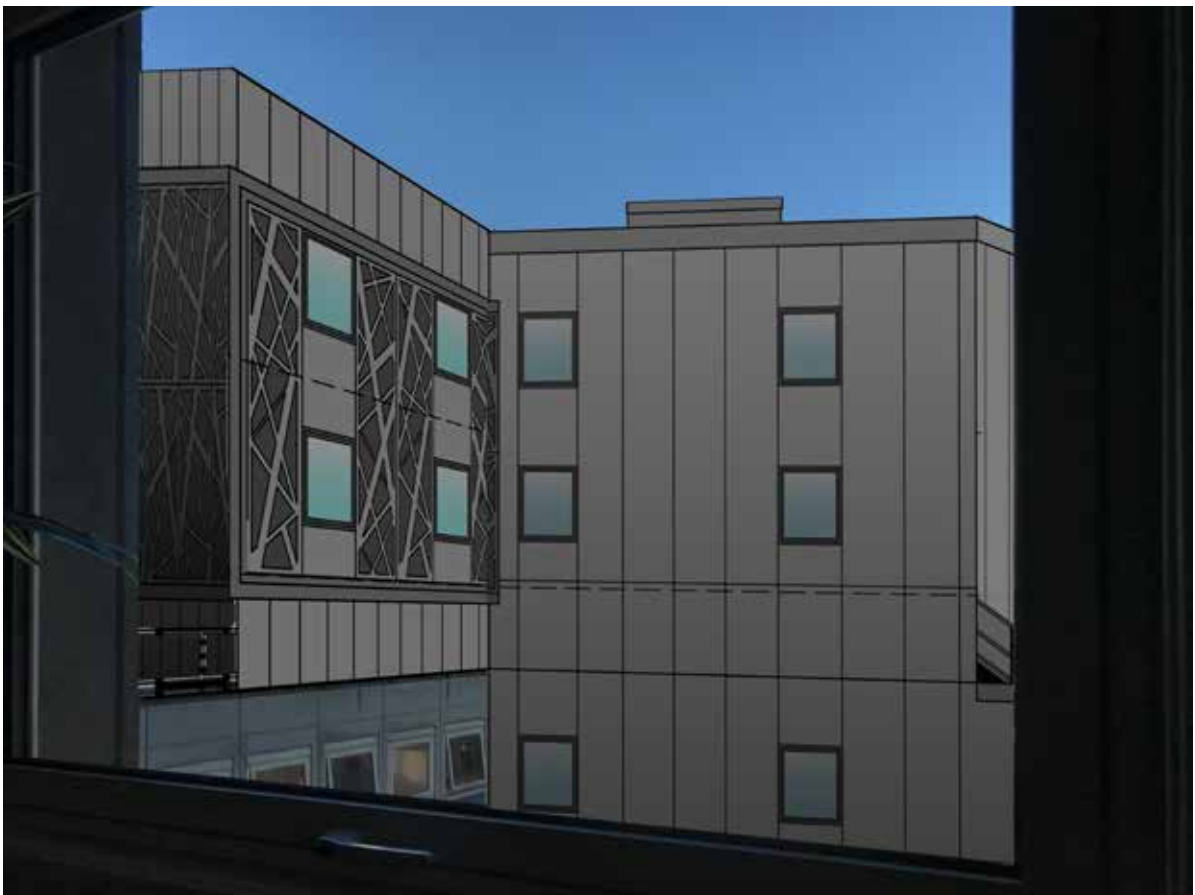


Figure 3. Loss of outlook, light and privacy from Flat 3 living room





Figure 4. View from Flat 9 living room



Figure 5. View from Flat 17, home to an 81 year old resident who has lived in Somerton House since it was built in 1965



Figure 6. View from Burton Street, inside the Bloomsbury Conservation Area



Figure 7. Residential view from Flaxman Terrace,  
inside the Bloomsbury Conservation Area



Figure 8. View from Euston Road showing proximity and scale of extension in relation to residents homes



2009



2017



2018



2011



2012



2019

Figure 9. Resident access route blocking - historical

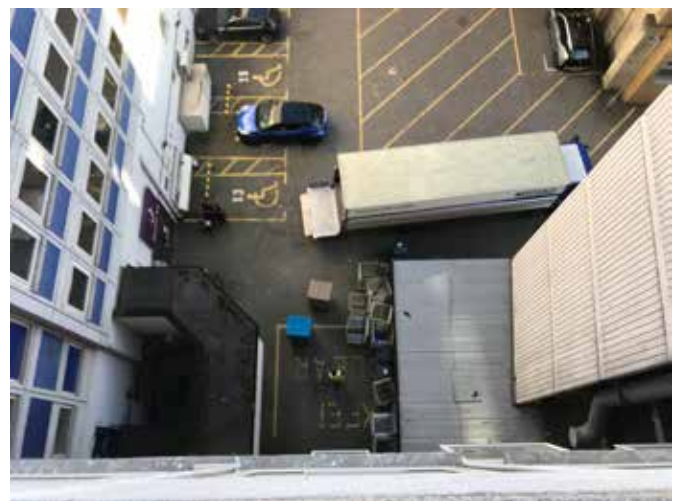
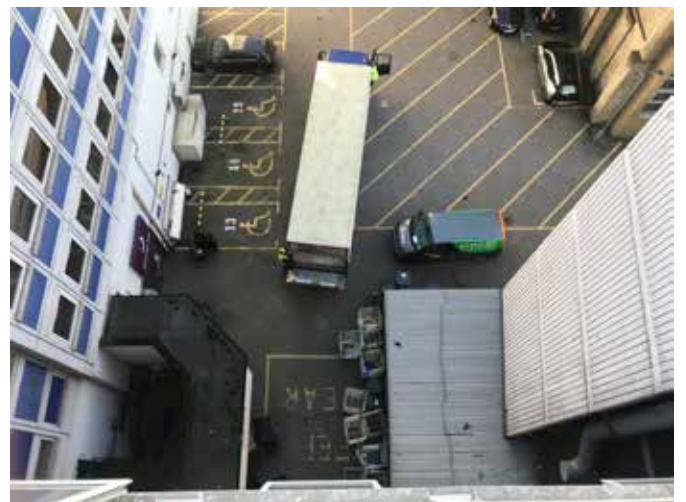
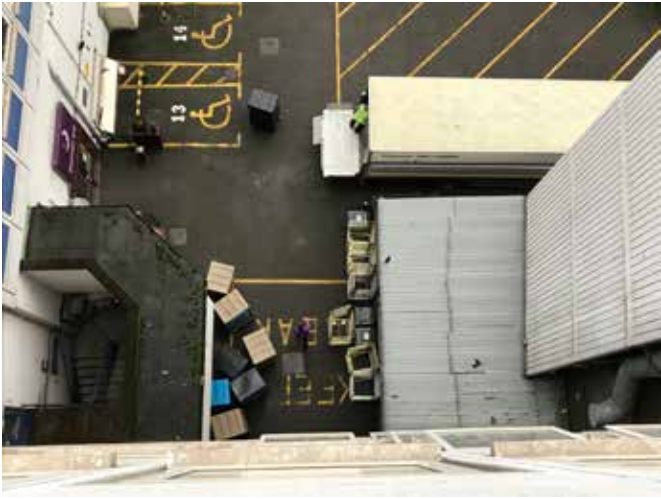
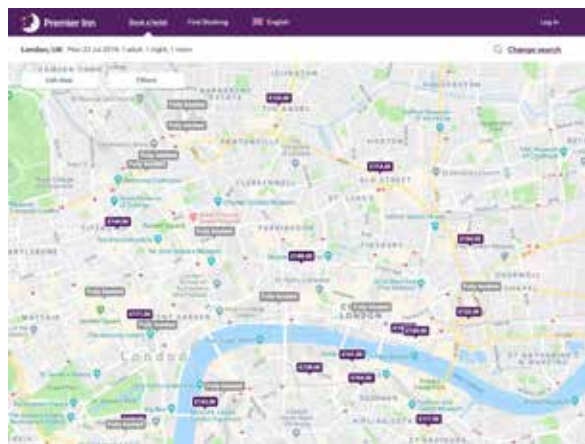
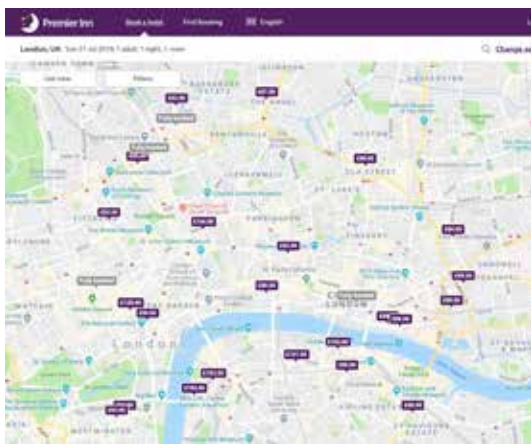
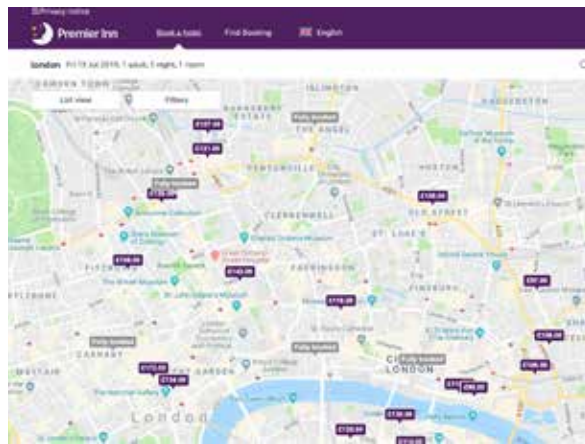
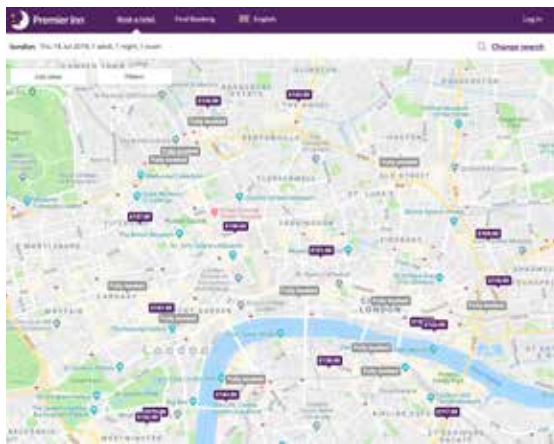


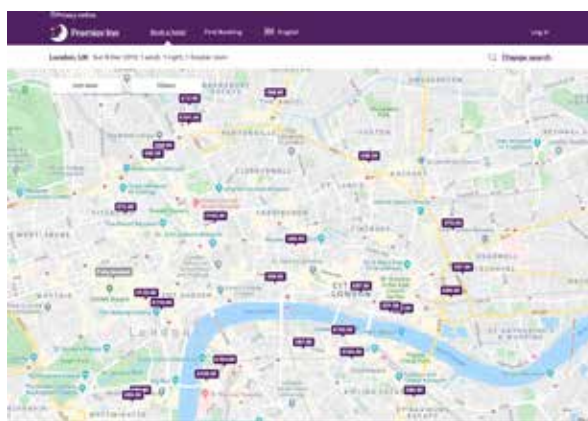
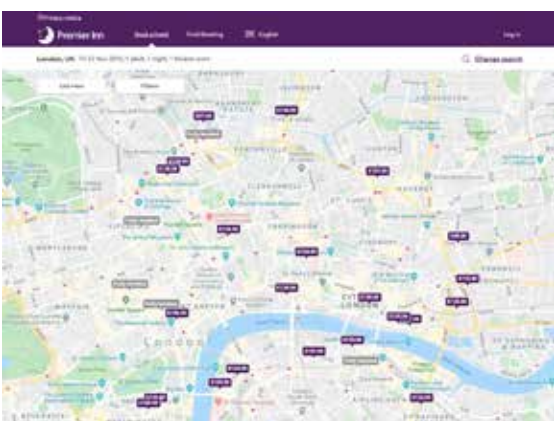
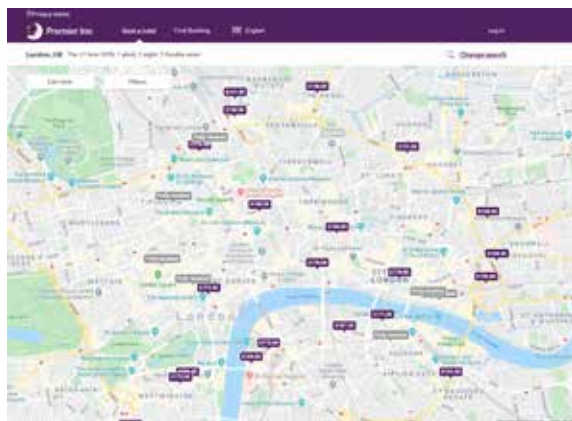
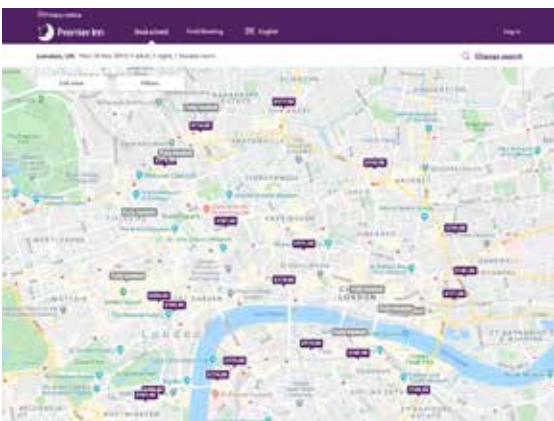
Figure 10. Resident access route blocked  
- 22 November 2019 - 5 December 2019

Figure 11. Premier Inn occupancy rates June and Nov/Dec

June 2019



November/December 2019





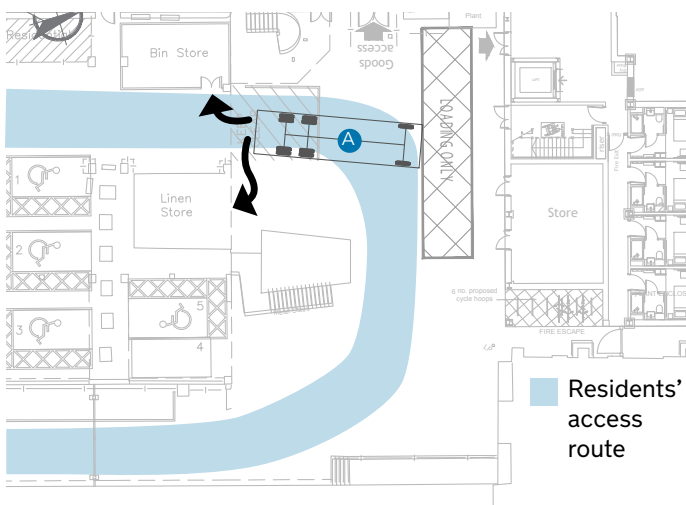
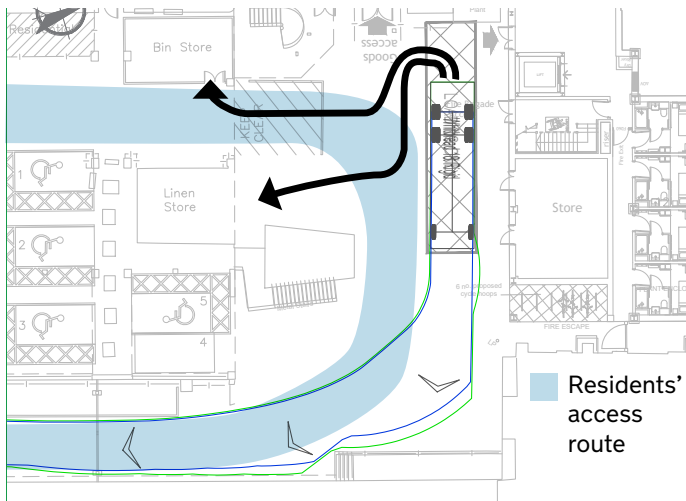


Figure 12. Storage area positioning will lead to inevitable access obstruction, as has been ongoing to over a decade