

4 April 2020

To: Patrick Marfleet, Planning Officer
Camden Council Planning

RE: Planning Application 2020/0928 P (Francis Gardner Hall)

Dear Mr Marfleet

I am the freeholder and owner-occupier of Smyrna Road and I write to you with my reasons for objection of the above planning application.

Loss of Light

12 Smyrna Road consists of 3 levels: basement, ground and first (top) floor. As a result, 12 Smyrna Road is the shortest building within this area by far and away. It is at least 2 levels shorter than the current surrounding buildings and will be 5 levels shorter than the proposed new plan for Francis Gardner Hall (including the roof).

12 Smyrna Road is on the first (top) floor), essentially 2 levels from ground level. In their Daylight & Sunlight report, eb7 includes an assessment for 12 Smyrna Road where they state that sunlight need not be analysed for windows within 90 degrees of due north under BRE guidance and therefore conclude no further analysis or assessment is needed. However, they have failed to consider that Flat 6 has a large, primary window within 90 degrees of due south that their picture (Image 4 on p.17 of their report) fails to capture. Furthermore, as you can see from their image, there is a large rooflight window that allows primary light to enter the flat as it is almost directly facing due south. The additional height of the proposed new Francis Gardner Hall will dwarf 12 Smyrna Road and reduce the primary source of light entering my flat. This is of great concern to me as these are the only sources of light to the flat.

Loss of Privacy

As mentioned above, the existing building already has a high vantage point creating a direct line of sight into my bedroom and living room from the back windows of the existing accommodation. Adding an additional 2 levels with increased number of student beds drastically reduces the already low level of privacy. This neighbourhood is quiet and family/couple oriented and is in stark contrast to the dense occupation of young student accommodation in very close confines – the rear windows are just a few metres away. Privacy is highly prized and highly valued in a city where buildings are already very close together and the further lack of privacy is of great concern to me.

Increased noise levels

The natural lifestyle of the existing students is already at odds with the quiet, residential community that exists in this area. The current levels of noise, music and chatter due to the closeness of the buildings is already high – I can easily hear conversations, music etc. Adding an additional 2 levels and student beds will only serve to increase the noise levels and disrupt further the quiet, residential life that exists in our neighbourhood.

Disruption at street level

West End Lane over the years has become increasingly populated and the single file traffic during almost any point of the day is very high. The street works and disruption on this single file key road will result in huge amounts of noise and disruption to traffic flow, making it difficult for us to go about our daily travels in the normal way. The traffic and area are already congested, and these works would add a huge amount of pressure to a traffic and pedestrian flow system that is just about coping. For example, the buses can barely get through on the winding parts of the road already, and I would not welcome diversions to the travel route that would add even more time to daily travel needs.

Environmental Impact

This is of great concern to me for two reasons. Firstly, the increased disruption and resulting traffic on West End Lane itself would result in much higher levels of pollution. Already, during high traffic, one cannot walk on the pavement without inhaling car fumes due to their proximity. There is a detrimental impact to our personal health and to the planet itself. If anything, the current Covid-19 pandemic is reminding us that we need to take care with how we use our land. And the complete demolition and rebuilding of Francis Gardner Hall does not seem to provide any benefit from an environmental perspective.

Secondly, the Energy and Sustainability report produced by MWL summarises that the new building (which it classes as non-domestic) would achieve a 35.10% reduction in CO2 emissions. However, the report does not highlight that only 8.61% of this is achieved by energy efficiency and the majority is instead achieved by energy supply. In the recent London Plan Energy (2017) topic paper, 'Lean' targets of 15% reductions from energy efficiency (within the 35% overall reduction target) for non-domestic builds were identified and included in the new draft London Plan (clause 8.1.2.). At 8.61%, this required target is clearly not met. Clause 8.2. of the same report states further that 'these targets are achievable for most development types' and 'applicants are therefore expected to adopt [these] measures'.

Furthermore, in accordance with the Energy Assessment Guidance produced by the Greater London Authority (2018), a new non-domestic building is required to demonstrate at least a 35% on-site reduction beyond Part L 2013 in CO2 emissions. MWL's report has calculated a 35.1% total reduction in emissions. CO2 emissions are notoriously difficult to calculate with numerous variables, different versions of SAP emission factors, complex calculations and calculation of 'credits' based on judgement - it is very easy to manipulate the calculations and therefore results to produce a 0.1% change in the final figure calculated. In fact, Section 6 of MWL's report clearly show how the majority of the low and zero carbon technologies mandated for use are not feasible with the proposal for Francis Gardner Hall and the calculation of 'credits' in the Appendices to the report have many sections based on judgement. Therefore, it is highly unlikely that the building really does project a total reduction of 35.1% in CO2 emissions.

The above are my primary reasons for objecting to the above proposed development for Francis Gardner Hall and I respectfully request that you consider my comments in detail.

Yours faithfully,