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Amir Meidan
Flat 14
141-153 Drummond St
London NW1 2PB

23 October 2020

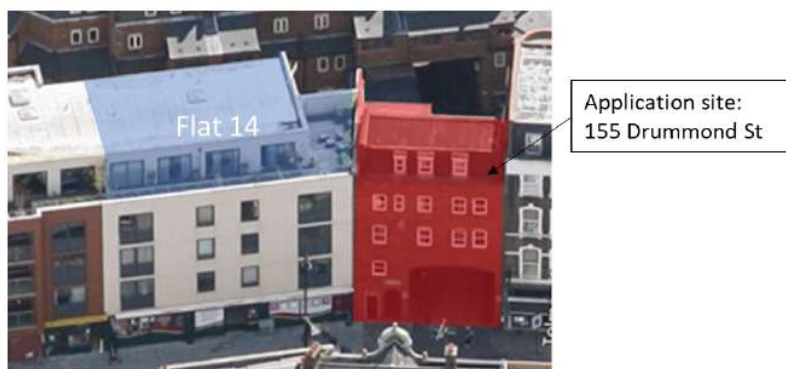
Ms Nora-Andreea Constantinescu
Regeneration and Planning
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London WC1H 9JE

Dear Ms Constantinescu

OBJECTIONS to planning application 2020/4086/P - 155 Drummond Street London NW1 2PB

Please find attached below a list of objections and concerns as they pertain to planning application 2020/4086/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 a six-storey residential building with a terrace at roof level.



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

My residence is on the fourth floor of 141-153 Drummond Street which borders 155 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 the roof terrace and the western facing windows of the 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 P23A indicate that the proposed development will double the length of the western wall, as well as increase the height of the western wall across its entire length by some 6m. This will obviously block out a large proportion of the **daylight and afternoon sunlight** currently received by roof terrace and the western facing windows of the living room, as well as the sole window to the 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 as part of the current proposal. A previously withdrawn application by the applicant had concluded that there would be significant reduction in daylight to the western bedroom. Without a daylight and sunlight report it is not possible to quantify the extent of the newly proposed development's impact on the daylight and sunlight levels currently received by Flat 14's terrace and western facing windows.

The proposed scheme shown on the application drawing P23A has indicated that the proposed development will have balconies to the rear of the building. While the proposal indicates that no harmful overlooking will affect the residents of Tolmers Sq Estate, no such indication has been made for Flat 14. The position and angle of the proposed balconies would clearly allow for direct **harmful overlooking** to both the terrace and more importantly to the bedroom, as well as other flats within 141-153 Drummond Street.

The height of the proposed development is over 150% of 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.

Please note that the proposed development includes a lift shaft extending to the 4th 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.

We therefore **object** to the proposed scheme on the grounds that it will cause unacceptable harm to amenity by virtue of the outlook, sunlight, daylight, overshadowing, overlooking, wind and potential

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

noise/vibration impacts it would have on Flat 14 and other flats in 141-153 Drummond Street. 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.

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...”

Please 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:

- 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;

.....”

We therefore **object** to the proposed development plans to introduce a 6-storey building with a roof terrace, which clearly does not maintain or respect the prevailing three to four storey building height and scale of Drummond Street. As such it is not in accordance with the *Euston Plan (2015)* or policy D1a of the *Camden Local Plan (2017)*.

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.”

Omissions and Deficiencies

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

1. The applicant requests material consideration for the **inaccurate** claim that

“An additional two floors could be added to the existing building without planning permission further to the new permitted developments rights which have been recently introduced by the Government”

However, the new legislation plainly states that it is applicable to:

“New dwellinghouses on **detached** blocks of flats”

and proceeds to define the interpretation as:

“detached” means that the building **does not share a party** wall with a neighbouring building

155 Drummond Street shares a party wall with both 141-153 Drummond Street and 159 Drummond Street as shown in drawings submitted by the applicant (e.g. P03A, P04A, P05A, etc).

Furthermore, the legislation states that “Development is not permitted” if:

- d) the additional storeys are constructed other than on the principal part of the building

The proposed scheme seeks to build the additional 2 floors upon an extended 3rd and 4th floor

Therefore as the new rights are clearly not applicable to the proposed scheme, the Council should not give any consideration to the inaccurate claim made by the applicant.

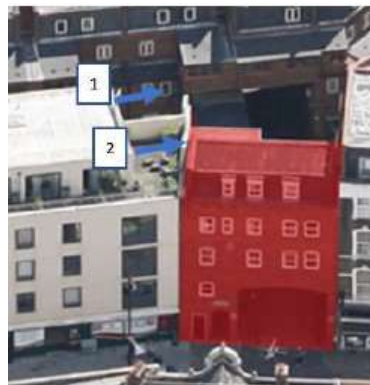
2. As stated above, the applicant has not submitted a **daylight and sunlight report** for the current planning application as required by *Camden Planning Guidance: Amenity (March 2018)* and is also missing a **Wind Impact Statement** and an **Acoustic Report**
3. The applicant incorrectly states in both the Design and Access Statement as well as the Location Plan that Gateway-A provides vehicular access to Tolmers Sq Estate. However as you can see in Appendix 3, Gateway-A does not allow vehicle access to Tolmers Sq Estate. The applicant further claims in the Design and Access Statement that Gateway-D provides vehicular access to Tolmers Sq Estate despite presenting an image of Gateway-D in the Location Plan which clearly shows that Gateway-D is a pedestrian only route. Gateway-C is the only entrance to the estate which allows heavy vehicle access including those of emergency services, and therefore the full height and width of this access must be guaranteed throughout any proposed construction.
4. It is regretful that yet again, the **applicant has made no attempt at contacting** myself, or to the best of my 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.

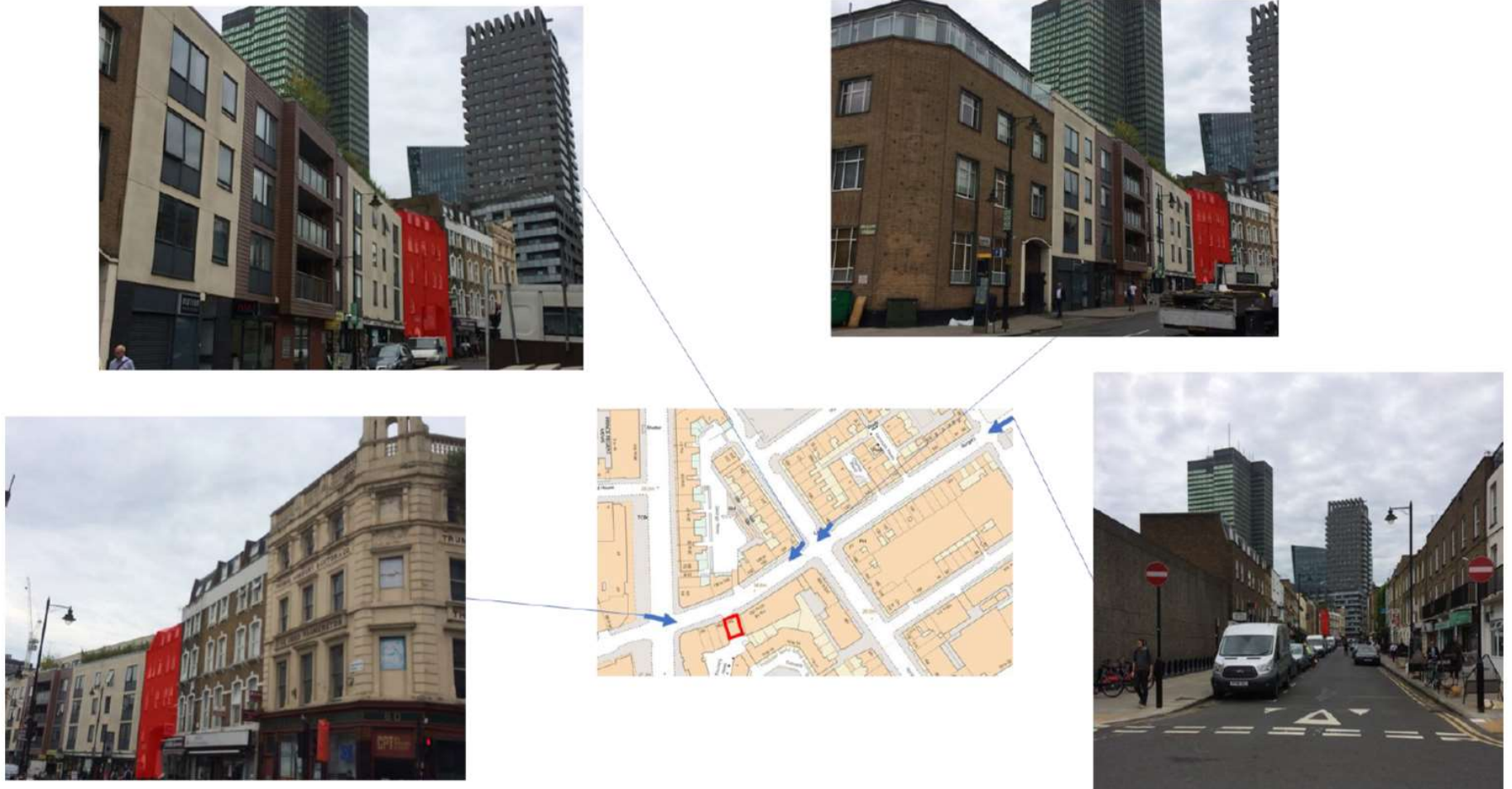
On the basis of the current submission documents, and in consideration of the above objections, we urge the Council to refuse the planning application.

Yours sincerely,
Amir Meidan

APPENDIX 1 – DAYLIGHT OUTLOOK FROM FLAT 14



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



APPENDIX 3 – VIEWS SHOWING GATEWAY-A BLOCKED TO LARGE VEHICLE ACCESS

