| Application No: | Consultees Name: | Received: | Comment: | Printed on: 29/10/2021 09:10:03 Response: |
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| 2021/3673/P | J C Park | 23/10/2021 08:26:01 | OBJ | I wish to object in the strongest possible terms to this application. This application involves the installation of industrial scale processing equipment and processing of unknown and potentially dangerous material in what is a highly populated office and residential area. Confined spaces between Grays Inn Road and Brownlow Mews and the narrowness of the mews itself already mean that any ambient noise is amplified. Filling the courtyard and the roof with substantial plant equipment is unsuitable for this location for that reason alone. The three mews, including Brownlow, have been transformed by recent Camden planning and development decisions into a delightful mix of residential and small office space and traffic hazard in the narrow confines of the Mews continues to be the subject of comment to the Council. Whatever deliveries and waste removal traffic will be required for this development will have to access the site via Brownlow Mews given the recent changes to pavements, cycle lanes etc in Grays Inn Road itself. The access to this building, so close to the entrance of Brownlow Mews off Roger Street, is unsuitable for such traffic as the recent vehicles blocking the carriage way to strip out the building illustrate. The nature of the speculative development, involving as it does a Wet Lab which is intended to process unknown and potentially toxic substances close to homes, is also very concerning. Who from Camden Council or elsewhere is going to regulate and supervise the lab to ensure it complies with regulations governing this potentially dangerous work? Leakage of any toxic material in a densely populated area and close to major roads would be very expensive for Camden Council. This is privately owned speculative development and will be driven by commercial considerations once in operation, renting of lab space to various commercial companies involved in unknown work is a key concern. Who will understand and supervise the risk management of these very specialist activities and who will bear any liab |
| 2021/3673/P | Ayesha Waheed and Thomas Reuner | 21/10/2021 23:07:34 | OBJ | We are writing to register our strong objection to the planning application for 85 Grays Inn Road. Although the development has been described as "Commercial Minor Alterations", we understand that the proposed changes are extensive and involve a material change of use of the premises. Having looked at the proposal, we are appalled at the prospect of a life science laboratory being established in such a quaint mews in the heart of the Bloomsbury conservation area. The potential for excessive noise and fume pollution appears to be significant and allowing such a development to proceed will have a detrimental impact not only on the local residents but on the neighbourhood as a whole. We urge Camden to reject the proposal. |

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| 2021/3673/P | Annabelle Cornelius | 21/10/2021 17:07:26 | OBJ | Dear Sir/Madam |
| | Comenus | | | 85 Gray¿s Inn Road, WC1 - Planning Reference 2021/3673/P |
| | | | | We are the owners of 4 Roger Street. |
| | | | | We object to the above planning application on the following grounds:- |
| | | | | ¿ Policy C1: Health and Wellbeing¿ requires that developments must contribute to creating high quality, active, safe, and accessible places, which the proposal arguably doesn¿t due to the proposal still maintaining only one vehicle access point on Roger Street. |
| | | | | ¿ Policy A1: Managing the Impact of Development¿. Policy A1 seeks to protect the quality of life of occupiers and neighbours to development. We believe that the development causes unacceptable harm to amenity in terms of:- |
| | | | | Visual privacy, outlook Sunlight, daylight and overshadowing Artificial lighting levels Transport Impact of the construction phase Noise and vibration levels Odours, fumes and dust Brownlow Mews is primarily residential and all of the above will have a significant impact on both residents and our office tenants |
| | | | | ¿ Policy A4: Noise and Vibration¿. With the increased plant work on the roof, diesel generator and fumes, it is likely that the noise produced would cause harm to the neighbouring amenity. |
| | | | | ¿ Policy CC4: Air Quality¿. We are incredibly concerned about being exposed to high levels of air pollution. As the Laboratory is still unsure as to what chemicals it would be handling, we are concerned that the level of air pollution hasn¿t been shown to be to a safe level. |
| | | | | ¿ The site is within the ¿Bloomsbury Conservation Area¿ and we are concerned that the alterations/extensions will have a detrimental impact on the character and appearance of the area in terms of inappropriate roof level extension and additional prominent roof plant that would detract from both the building, character and appearance of the area. |
| | | | | Yours faithfully |
| | | | | Annabelle Cornelius |

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| Application No: 2021/3673/P | Consultees Name: Andrew Gillman | Received: 24/10/2021 15:55:03 | Comment: OBJ | 1. Inappropriate change of use to a lab 2. A heath hazard to residential neighbours 3. Overshadowing 4. Over-bulking 5. Insufficient noise control over the roof top generator and courtyard generator 6. Fume and exhaust measures are insufficient for a residential neighbourhood 7. Insufficient consideration of neighbouring residential properties, particularly to the rear and west. 8. Increase in large vehicles accessing the site to the rear in Brownlow Mews to service the site and its tenants. |
| | | | | The Heritage Statement by Savills Heritage and Townscape was not included in the documents available on the planning portal. Please can this be uploaded and additional time provided to read and comment on it. |
| | | | | This application is essentially an unregulated Air B&B for chemical and biological experiments in the middle of a residential area. The direct neighbours are residents. Ad Hoc rental of labs by whoever wants to come along. |
| | | | | It's a far stretch of the imagination to be able to support the application's claim that this is part of the Kings Cross Knowledge Quarter. This is Holborn & Covent Garden. |
| | | | | The application form appears to suggest that their 'trade waste' isn't going to be disposed of, yet foul sewage is going into the mains sewer. This give an early glimpse into the chancers land-grab of ill thought-through opportunity. |
| | | | | "fume extract plant for the safe discharge of exhaust air from specialist laboratory containment devices e.g. fume cupboards." |
| | | | | How will the applicant monitor and control the ad hoc renters of the labs use of hazardous substances and waste. It's all very well to tick the no hazardous substances box, but what about controls and guarantees and monitoring of what's going into and out of the labs. The application is suspiciously silent on this. Does the applicant know? Of course not, they haven't taken Air B&B-style bookings yet. |
| | | | | The application accepts that the plan to build above the current height does not comply with VSC. They accept that their plans will cause overshadowing to " "On the basis of the transient overshadowing study there will be some additional shadow caused by the proposed development to the amenity spaces which is limited to only a few hours." They say this does matter because "little to no change occurs to the amenity spaces at the times they are most likely used and enjoyed." The developer relies on dictating to private residents how and when they should use their own living spaces. |
| | | | | They recognise that residents already suffer from some light deficiency, "it is apparent that natural light sources to these rooms is already very limited" And they want to make it worse. This is completely unacceptable. There should be no further increase in building on the roof. |

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The noise survey pays no heed to the canyon effect and to the repercussion to the residents of Brownlow Mews beyond their immediate neighbour. Many other properties have line of sight (and audio) to 85 GIR. The site description intones the wider majority of neighbours. Had when comparing the intended height of the development of the roof of 85 GIR it only (conveniently for the application) compares to the largest of the neighbouring buildings. "the building services plant on 85 Gravs Inn Road, at least two storevs higher than the closest neighbouring residential buildings." Many other residential buildings will see and be affected by this completely disproportionate over-bulking. The highly selective examples in the report is misleading for the local area.

The standby generator on the roof needs even taller solid barrier screening around it, "...and maybe need to move it further away from the nearest residential building. For the purposes of planning this is not particularly onerous and can be dealt with during detailed design stage." What sort of deal is that? Either the generator or even more over-bulking on the roof? This further shows the entirely inappropriate and disproportionate requirements of the development.

It's not just this bulking, there's also the venting. "...individual fume cupboard extracts are to be provided for each floor which will be required to exhaust at high level into the atmosphere." "fume extract plant for the safe discharge of exhaust air from specialist laboratory containment devices e.g. fume cupboards." Does this make the fume cupboard safe, so what about the atmosphere and residential neighbours? Is it going to be safer for residents to apply to live in the safe fume cupboard?

"The flue heights are estimated to be circa 9-10m above plant enclosure roof level." Not only noisy, but what's coming out of them and how is this being monitored, controlled and eliminated? And, again, no reference to the canyon effect. And a 10m chimney fed by the fume cabinets in the labs below?

But it's not just his, there's also this horror for all the residents that have not been considered, RWDI engineers have recommended to have the new fume exhaust to the west has to avoid interference with air flows associated with and circulating around the ITN Building." There seems to be a wilful disregard for anything not facing the front of 85 GIR. Brownlow Mews, North Mews, Roger Street, John Street, Doughty Street... simply not considered. These residents can suffer instead of ITN. It's plain and simply wrong.

"The preliminary assessment indicates that various items of plant would not achieve the requirements of the Local Authority without suitable acoustic mitigation measures." Here's the dilemma - do you want it noisy or over-bulked? Both are unacceptable.

The courtyard generator is like placing it inside a drum in a canyon. It doesn't feature in the noise report, but is referred to in the Planning Statement.

The Mews is predominantly residential, and with the canyon effect of tight grain development, noise bounces off the hard surfaces of the buildings. This has a dreadful impact on the health and wellbeing of the many residents.

Access to the site by motor vehicles serving the laboratories, and for waste disposal as stated to be at a time when parking restrictions are not in force. This means early mornings, evenings and weekends. This

| Application No: | Consultees Name: | Received: | Comment: | Response: additional noise and traffic is unacceptable and affects the amenity of residents. It's not vehicles to make a safe left turn from Brownlow Mews into Roger street. The corner at damaged from the internal demolition and strip out activities. The application is highly selective. It seems to have wilfully disregard the majority of rogeromote the self-interested of Air B&B-style chemical and biological lab rental. This application "acknowledges the importance of high quality design which respect | ot possible for nd payment is near neighbour | s already irs in order | 09.10. |
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| | | | | appearance of the Bloomsbury Conservation Area." Over-bulking with two stories-we to hide plant and generator and a 10m chimney is absolutely not the way to do that. | orth of height o | on the roof | |
| 2021/3673/P | Teresa Borsuk | 22/10/2021 15:54:01 | OBJ | I write as the owner of 30 Brownlow Mews - a residential property diagonally opposite and as a resident of 61 Doughty Street. I have the following comments to make on the planning application: The application fails to acknowledge or appreciate the extent of residential accomm the development site and in particular, Brownlow Mews. Commercial viability. "No additional plant can be located within the building as a rechave a detrimental impact on the commercial viability of the re-purposing of this buildin sector". Commercial viability is not a planning matter and should not dictate the design detriment and harm of neighbours. The Fume Extract. The fume extract is located away from the commercial ITN build closer to the homes in Brownlow Mews. The height of the fume extract is only "indication a desktop analysis. Further analysis will be carried out at a later design stage that a required heights and performance of the flues" and "it is not known what chemicals will fume cupboards." This lack of precise information for such a significant matter is not a accurate assessment of a full planning application. The delivery and operational strategy is flawed. Works to the building have started occasions Brownlow Mews has been blocked to any vehicular traffic. The deliveries/pi Road is shown in the Mews, directly adjacent the only Pay & Display spaces in the struchicle is parked in this location the street is completely blocked (as the street is close end). This was the situation this morning. All traffic movement was halted and there we the surrounding streets. (Please advise how I can send a photograph which clarily she "Larger deliveries of consumables and equipment will be required to be managed with Brownlow Mews rear courtyard" and "any external refilling of gas storage vessels will time outside parking restriction times." This is an open-book for night-time delivery and noise and nuisance that can cause. Noise. "The preliminary assessment indicates that various items of plant would not of the Local Authority w | duction in the duction in flooring for the BioSin - especially to ling/Grays Innive at this stagwill determine II be utilised wincceptable for the and already of ick-up to 85 Greet. Once a dead at the Guilforas a build up crows this.) In an access gaine need to take per did all the conservation measures with the properties are son and respite | e vicinity of r space will Science to the Road and ge based the vithin the the on many Grays Inn elivery ord Street of traffic in addition, ed through blace at a equent equirement on is not vill be in single e from | |

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2021/3673/P

onse:

I write to register my objection to the proposed development of the vacant office property, 85 Gray's Inn Road (planning application 2021/3673/P). As this is office space, the proposed industrial development is a completely different use class having an impact on all local businesses and residents. This impact includes:

LOSS OF LIGHT AND PRIVACY FOR NEIGHBOURS

The plans make insufficient consideration for the loss of light and privacy to the residences to the rear of Gray's Inn Road and Brownlow Mews.

Those terraces that directly adjoin 85 Gray's Inn Road will be rendered unusable. The lightwell for the lower communal hallway of 4-6 Brownlow Mews is also impacted.

EXCESSIVE NOISE

It is noted that the level of plant required exceeds that which can be accommodated on the roof. The proposal includes the infill of the courtyard area to accommodate the additional plant required for the site to operate as a life science laboratory.

The infill is directly adjoining the neighbouring residential properties. Using this space for plant will negatively impact the noise levels for all neighbouring properties.

The proposed daily diesel generator will only further exacerbate the noise levels.

It is unclear what the operating hours of the building would be, and for what parts of their days residents would be exposed to this noise nuisance.

POLLUTION

The proposal to convert this office premises for use as a life science laboratory necessitates substantial fume extraction. It is noted that the substances to be used are not known at present, and that leakages may occur. It appears both unwise and unnecessary to introduce the associated risks of such an operation into an increasingly residential area.

INCREASED TRAFFIC

There is only one access point for vehicle to enter Brownlow Mews - the junction with Roger Street. (The access to Guilford Street being pedestrian only.)

The proposal is for several different companies operating within the premises rather than just one as previous. This will necessitate a significant increase in the deliveries required when the building is in operation.

It is unclear whether the access to the rear of the building (i.e. from Brownlow Mews) will be retained for delivery vehicles. The plans suggest that the courtyard would be used for bicycle, waste and clinical waste storage only. We are concerned that the absence of proper provision to receive vehicles inside the site's boundaries will cause undue congestion and obstruction to the residents and small businesses of Brownlow Mews. With multiple occupants in the building, this issue will necessarily increase.

ENERGY EFFICIENCY AND THE ENVIRONMENT

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| | | | | It is noted that "achieving higher targets [than B] for refurbishing a building of this era fo would be challenging". This would further suggest that this site is not the correct location proposed. | | | |
| | | | | Additionally, the proposal makes no contribution to local or national environmental, sust crisis plans. | ainability or | climate | |
| | | | | This site is not suited to this development and change of use. It is interesting to note the industrial facilities are located in an industrial park where pollution and waste can be ke general public. I urge Camden to reject this proposal. | | | |
| | | | | Speaking on behalf of myself and family, Gareth Cadwallader and Edward Neville-Cad Yours sincerely Nancy Neville 21C Brownlow Mews WC1N 2LA | wallader | | |
| 2021/3673/P | Ian Lawton | 20/10/2021 19:23:37 | OBJ | Hi, Having looked at the planning application for 85 Gray's Inn Road I would like to submit concerns about the development. | my objectior | ns and | |
| | | | | I live in Brownlow Mews which is adjacent to the building in question. My concern about it plays down the fact that the development is located in the middle of a residential neigl purely on the commercial aspects of the area. Since lockdown, residents (adults and chave become much more familiar with each other a monthly "Sunday Sweep" of the Mewhole street to clean and tidy the environment. The planting of trees and bushes by the enhanced the appearance and increased the community spirit. | hbourhood a nildren) of ou ews brings to | and focuses ur area ogether the | |
| | | | | The particular concerns of the submission are around the installation of the diesel flue. of noise that this will generate nor the levels of dangerous particles that this could produchimney could only increase the already high levels of pollution in what is intended to be flue would also be within 200 metres of a local school which again would go against any quality in the area. | uce. Any ado e a ULEZ zo | ditional one. The | |
| | | | | Its also not clear on the types of hazardous material that may be present in the building clear on what scientific research may be carried out in the premises. Buildings of this ty away from residential areas. | | | |
| | | | | A final concern is that they appear to be constructing the conversion without any approxis a large structure being assembled on the roof of the building and the changes to the progressing at a pace. All works on the building should be halted by Council immediate already having a detrimental effect on the neighbourhood and residents and without any | courtyard ar ly as the wo | e rk is | |

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| 2021/3673/P | Michael Shipley & Philip Rudge | 21/10/2021 15:24:28 | OBJ | Philip Rudge and I are residents at 21B Brownlow Mews. This application is to convert an office block into a semi-industrial building (wet and dry labs) with associated filling in of a courtyard opening onto Brownlow Mews and the addition of a large extraction plant and flue. | |
| | | | | We object to this proposal on several grounds. 1) Although the pedestrian entrance is on Grays Inn Road, the vehicular access for deliveries will be from Brownlow Mews. The impact on Brownlow Mews is barely mentioned in the application. The proposed development will affect the traffic levels in Brownlow Mews which is a predominantly residential cul-de-sac (closed at its north end to vehicular traffic). The removal of the courtyard space opening onto Brownlow Mews will greatly increase vehicular parking at the entrance to the Mews. It is already narrow. This is unacceptable. 2) This is the conversion of a building from office to light industrial use. This is wholly inappropriate to the area. The flue, albeit at roof level, is likely to increase air pollution to adjoining buildings. Noise from two fans will add to noise pollution in adjacent residential buildings in Brownlow Mews 3) Filling in the courtyard will block light access to adjacent flats in the Mews and render their rear aspects dark and their balconies unusable. | |
| | | | | Clearing of the building has already started. The noise levels as metal and other materials have been thrown for the windows is a bad indicator of what is to come during the rebuilding. | |
| | | | | We believe that there are sufficient grounds to reject this unwelcome, semi-industrial conversion of office space in a dense residential area. | |