

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	Debbie Radcliffe for Bloomsbury Residents Action Group (BRAG)	02/11/2021 19:31:54	OBJ	<p>The Bloomsbury Residents Action Group (BRAG) was formed in 2016 to offer support to residents in South Camden regarding planning issues and other matters, particularly in instances where local people feel that their concerns are not being taken sufficiently seriously.</p> <p>This application is a case in point, and we fully support the detailed objection made by the Chenies Chambers Leaseholder Association (RTA).</p> <p>We note that 9 Chenies Street (Chenies Chambers) is the nearest residential building to the application site, being a block of 36 flats with a communal garden. The adverse effects on these residents include loss of light, loss of privacy, loss of visual amenity, as well as increased noise and vibration from rooftop plant and fans resulting from the increased roof level to the back of the Telephone Exchange, the workshop building, on Alfred Mews. The proposed extension would also alter buildings of architectural merit within the Bloomsbury Conservation Area.</p> <p>The fact that neighbouring residents were not properly consulted is an issue of concern. The focus seems to have been on the developments impact on North Crescent, with limited attention paid to impact on the rear - which directly overlooks the rear of 9 Chenies St and its garden, planted with mature trees and shrubs. The inevitable noise from an office terrace could certainly impact on residential amenity and plant and fans can generate a serious noise nuisance for nearby residents.</p> <p>The Applicants Statement of Community Involvement includes a reference to BRAG, which gives a misleading indication that we had been consulted. We had indeed been sent a general letter requesting a zoom meeting, which we did not take up, as we were not made aware of any specific concerns relating to loss of residential amenity. This was due to the fact that knowledge of the development proposals had not filtered through to all nearby residents. The consultation process does not seem to have been carried out with sufficient thoroughness, especially the lack of engagement with residents at 9 Chenies Street.</p>
2021/3704/P	T T-B	29/10/2021 14:48:39	OBJ	<p>I own a leasehold flat in Chenies Street Chambers, which is the closest residential building to the proposed work, which includes a communal garden (which is a real plus when owning a central London property). I oppose the application of the proposed extension as this would have a huge impact on the architecture in Alfred Place Character Area, within Bloomsbury Conservation Area. The final building would be overbearing and intrusive and would affect the life for the people living in the flats and the communal garden. This would include more noise from the rooftop plant and fans due to the increased roof level to the back of the Telephone Exchange (the workshop building on Alfred Mews), loss of light and loss of privacy. Please reject this application to stop the negative effects it will have on local residents and the local area.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	Roger Kain	28/10/2021 10:31:05	OBJ	<p>I write as the owner of 12 Bloomsbury Terrace, Huntley Street which adjoins the proposed redevelopment of Telephone Exchange and Minerva House. I should say at the outset that I have not been officially notified of the application or consulted by the developer. That is not good practice, Covid19 notwithstanding. The application says that potentially affected people were consulted by the developer; I was not and I have not found a resident of Bloomsbury Terrace who has been consulted. A flier from neighbours in Chenies Chambers alerted me.</p> <p>This development is much more than the refurbishment and reconfiguration of the existing buildings, including a one storey extension, plus plant, etc. of its title. Having looked at the documents this is a wholesale redevelopment of the site behind the façades of North Crescent at an increased height and much increased volume. My bedrooms and balcony will be about 12 metres from the development which will directly overlook my property and destroy its privacy and general amenity.</p> <p>I object to (1) the height of proposed alterations to Telephone Exchange directly impacting my property and others in Chenies Chambers and Huntley Street – the height extension is stepped back on the North Crescent side but it is full height to the north and especially to the east; (2) that the window area of the new build is explicitly to be maximised on the side of the proposed development directly overlooking my property; (3) to the resulting air and noise pollution from the proposed heating and cooling plant which as far as I can judge is proposed to be located close to the residential properties of Huntley Street rather than at the Minerva House end which is surrounded by commercial properties – their proposal as it stands would bring significant health and well-being risks for residents in Huntley Street; (4) I refute the developers claim to be enhancing the Bloomsbury conservation area and historic asset. What is proposed runs counter in my view to the wonderful work that the authority is doing locally in the West End Project.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	MR E TAN	28/10/2021 16:02:26	OBJ	<p>I write as a resident of Huntley Street which adjoins the site of the proposed developments to the telephone exchange building.</p> <p>I wish to object to the proposed works since this will cause significant inconvenience, disruption and loss of privacy to residents in Bloomsbury Terrace.</p> <p>Loss of privacy and light - the addition of extra floors to the building means it will overlook the rear of the Bloomsbury Terrace buildings - this is exclusively bedrooms and bathrooms. This will further restrict light and adds to loss of privacy from the additional floors overlooking the property.</p> <p>Noise and environmental pollution during construction - the proximity to our residential development means there will be significant noise as well as traffic and construction pollution for the duration of the project. Since the development directly adjoins multiple residential properties, I do not believe this should be permitted.</p> <p>Noise and environmental pollution during operation of the building - the addition of a plant room and extraction chimney means that during normal running of the proposed development there will be additional environmental pollution and well as constant noise pollution from these additions. As noted, the rear of the Huntley Street developments adjoin the proposed site area and all residents bedrooms and balconies face onto this.</p> <p>In addition, since the rerouting of traffic on Tottenham Court Road as part of the West End Project, there is significantly increased congestion on Chenies Street already and further construction would add to this, further increasing air pollution from idling traffic waiting to join Gower Street.</p> <p>Given the proximity to residential properties on both Chenies and Huntley Street, I wish to strongly object to these proposals and would kindly call upon Camden Council to review these plans with consideration to the residents of the local area.</p>

Printed on: 03/11/2021 11:17:40

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	Bloomsbury Terrace Managemnt	25/10/2021 21:17:33	COMNOT	<p>Bloomsbury Terrace Management Limited Owner of freehold of 1 to 9 Huntley Street</p> <p>Camden Council Camden Town Hall, Judd Street, London WC1H 9JE. planning@camden.gov.uk.</p> <p>Dear Planning Officers Planning Application 2021/3704/P Full Planning Application and associated Listed Building Consent for the development of Nos 1-4 and No.5 Chenies Street, WC1E 7EY</p> <p>I write as a director and current chairman of the board of Bloomsbury Terrace Management Ltd, the freehold owner of 1 to 9 Huntley Street [Bloomsbury Terrace], a residential development of 53 flats. The property of our 53 owners physically adjoins the site of the proposed development and the bedrooms of many flats are within 10metres of the proposed development. The company is owned by the owners of the 53 flats, many of whom are key workers in the NHS and other public services in the area. This representation is sent following consultation and to represent the interests of all our leaseholders and owners in the freehold.</p> <p>The development is described as 'Refurbishment and reconfiguration of the existing buildings, including a one storey extension, plus plant, minor demolition works associated with internal and external alterations to provide additional office accommodation and associated works'. We have studied all the documents on the Camden website, having had no consultation whatsoever from the developer.</p> <p>The proposed area of development is right up against Bloomsbury Terrace (1 to 9 Huntley Street). The bedrooms of the flats look towards the proposed development and the nearest ones are 10 metres from the proposed siting of the development and particularly the plant room (in so far as we can deduce from the great volume of documents). We show the curtilage of Bloomsbury Terrace in green on the plan attached to this letter, and where the curtilage of the proposed adjoining development is outlined in red.</p> <p>We wish to object strongly to the application on four principal grounds:</p> <ul style="list-style-type: none"><li>4) Lack of Consultation</li><li>4) Height of proposed alterations to Telephone Exchange directly impacting Huntley Street residences</li><li>4) Plant (which includes gas fired boilers) to be installed at back of TE -&gt; that is proposed to be adjacent to and directly facing towards Bloomsbury Terrace, within 10 metres of the flats at Bloomsbury Terrace. This will create noise and air pollution nuisance.</li><li>4) The lack of any meaningful plan to mitigate construction noise, or restrict the hours of construction or of operating nuisance from the development</li></ul> <p>Lack of consultation</p> <p>In the Planning Statement submitted as part of the application, it is stated (at 3.10 and 3.11) that 'a series of targeted public engagement activities have taken place to present the proposed scheme to local residents...' and goes on to describe 'targeted mailouts and a consultation website'. It cites c.1519 addresses having</p>

Application No: Consultees Name: Received:

Comment:

Response:

been consulted, and suggests in the Statement of Community Involvement, that Huntley Street was included in this consultation exercise.

The residents and owners of Bloomsbury Terrace on Huntley Street have NOT been consulted, in spite of their 53 homes being directly impacted by the proposed development, and in fact being the closest residences to the development. The application fails to recognise the significance of this residential area occupied, not least, by a considerable proportion of key workers, many of whom are associated with the NHS, health and public service facilities of the neighbouring area.

Thus, the applicant has failed to consult in any meaningful way with a significant proportion of the residents closest to the proposed development, notwithstanding the claims of the applicant in relation to public engagement. The National Planning Policy Framework (NPPF) specifically advises applicants to work closely with the local community (para 128). That they have not done so, yet claim that they have, is unacceptable. Our attention was drawn to this only by a flyer from the neighbouring Chenies Chambers two weeks ago.

Height of proposed alterations to Telephone Exchange directly impacting Huntley Street residences

The proposed extension to the height of the Telephone Exchange will directly impact on the residents of Huntley Street. The applicant has gone to great lengths to demonstrate that the upper floors would be recessed on the front, south-facing façade, to make it an appropriate scale of development, but shows no such consideration in relation to the extension for those who live behind the Telephone Exchange. There are no residences to the front of the development – only the street and offices. But to the rear, and only 10 metres from the development, are 53 residences of Bloomsbury Terrace and the many residences of Chenies Chambers.

The site of the proposed development and Huntley Street itself both lie within the Bloomsbury Conservation Area, and the area is a designated heritage asset. The applicant has emphasised this in relation to their proposed design of the new development. However, they have completely disregarded the effect that the proposal will have on the neighbouring residential streets, especially Huntley Street. The applicant claims, without consultation or evidence, that it will enhance the local townscape and the Bloomsbury Conservation Area, when in fact it will have the opposite effect on the neighbouring properties and street.

The development, if approved, will overlook bedrooms and balconies, and the height of the proposed development impacts privacy and outlook for its neighbours. We already suffer considerable noise from the site at anti-social hours – despite frequent requests to abate the noise (which are ignored) – and this will make it much worse. We note that the application states specifically (as part of the Energy Statement) that north facing windows areas have been maximised to take advantage of indirect sunlight while south facing windows have been designed to be smaller – that is – the windows facing onto Huntley Street will be maximised. This attitude of caring about commercial neighbours at the front of the building, and loading the damage and nuisance onto the residential neighbours to the east and north, permeate the application.

The many documents submitted with the application do not once, not a single time, refer to the impact on the residential area to the rear of the proposed development, and the real lives of those who live there.

Plant and discharges – air pollution/height requirements for discharge and locations of heating and air conditioning equipment

We note that the plant building for the development will be located at the rear of the Telephone Exchange in a space which the plan shows to directly adjoin Bloomsbury Terrace. In the Energy Statement there are prominent references to Air Source heat Pumps (ASHPs) and PV panels which will be installed as a part of the application. While these are to be welcomed on climate change grounds, there is no reference to the noise pollution caused by a substantial bank of ASHPs and the siting of these appears likely to direct the noise from

Application No: Consultees Name: Received:

Comment:

Response:

the fans of the bank of ASHPs towards Bloomsbury Terrace. This will be especially so if these (be it heating or cooling equipment) are sited at any level above ground level. However, in addition, buried deeply in a 133-page document, it is acknowledged that the development will be 85% dependent on gas boilers, and that 'to help us meet our 2030 net zero carbon target, we will be looking to phase out the gas boilers by this date. This is an admission that for at least nine years, and very probably considerably longer, the building will be discharging harmful emissions from its gas boilers which will be carried by the prevailing wind direction into the bedrooms and the residences of Bloomsbury Terrace. We could not find any analysis in the application of the dispersal of noise or air pollution from the plant -i and conditions for these need to be considered and agreed with adjacent neighbours.

#### Mitigation of construction and operating noise

It is already the case that the owners of the property authorise noisy maintenance operations on the site from 0500 hours, in contravention of all norms and rules for residential areas. Attempts have been made to ask them to stop this, as it wakes residents, but the site operators have always rebuffed these requests. The owners therefore are not seen as responsible neighbour-friendly operators.

We urge Camden Council to protect its residents by imposing strong and enforceable conditions attaching to construction noise, hours of operation, noise levels in perpetuity from the plant room and discharges of air pollutants from the gas boilers. These are quite normal conditions of planning authorities, and we are dismayed that the developer has not offered any reassurances on this to neighbours whose bedrooms are within approx. 10 metres of the proposed development.

#### Consultation and Engagement

We request that there be meaningful consultation with the residents of Bloomsbury Terrace before determination, so that the real and reasonable concerns of residents can be addressed, in accordance with the National Planning framework. No effort has been made by the developer to do this to date. Having been made aware of the proposed development only two/three weeks ago by neighbours in Chenies Mews, we have not been able to fully analyse the voluminous documentation attached to the application, and we would welcome a meeting to discuss the proposals.

We understand the limitations necessitated by the Covid restrictions, but that is no excuse for the lack of proper and transparent consultation with those who will be most impacted by this proposed development.

We would welcome the developer making contact and addressing our concerns as the nearest neighbour to the proposed development - something they have singularly failed to do.  
Yours Sincerely

J Cox  
Chair, Bloomsbury Terrace Management Ltd  
Freehold company of the 53 owners of 1 - 9 Huntley Street WC1E 6AJ

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	WM Heath	31/10/2021 22:38:11	OBJ	<p>I'm William Heath; I'm leaseholder of 15 Chenies St Chambers. My living space and kitchen look out directly on this proposed development and upward extension.</p> <p>This proposal is naked greed-driven expansionism. I can say for sure that no-one has consulted me about it, and that if they had they would be left in no doubt about the range and strength of my objections to this.</p> <p>This will negatively impact my light and outlook. It will overlook the charming garden that all residents of Chenies St Chambers enjoy, which is a rare sanctuary. That means loss of amenity and threat to the mature plants and trees that we enjoy.</p> <p>Obviously any number of landowners and developers would like to expand office buildings to try to make money. Residents like us look to Camden planning authorities to protect us and our quality of life from this constant encroachment on our light and amenities. We look to officers to apply the existing policies that protect us and to our Councillors to back this up with political will.</p>
2021/3704/P	Riccardo Ninfolo	29/10/2021 13:01:12	OBJ	<p>Dear Sir/Madam,</p> <p>I live in the area and I my opinion is that this project will cause pollution and noise and I don't think it is right put our community under this pressure.</p> <p>I wish to object strongly to the application.</p> <p>Kind Regards,</p> <p>Riccardo</p>

Application No:		Consultees Name:		Received:		Comment:		Response:		Printed on: 03/11/2021 11:17:40	
2021/3704/P		Peter Bowbeer		30/10/2021 21:56:14		OBJ		Re Planning Application 2021/3704/P			
<p>Dear Sirs,</p> <p>I wholeheartedly agree with the many detailed comments already submitted to you by the Chenies Street Chambers Leaseholders' Association, raising objections to this application</p> <p>As the resident of one of the rear flats in Chenies Street Chambers, I am particularly concerned about potential loss of amenity from the proposed development. All windows in this flat face northwards and receive no direct sunlight; the proposal to extend the height of the frontage of the Telephone Exchange by one storey and the rear building by 3 stories will have a detrimental effect on light levels. Additionally, any increase in height of the nearby buildings will further overshadow the enclosed garden of Chenies Street Chambers.</p> <p>Given the very enclosed nature of the open space to the rear of Chenies Street Chambers and the adjacent flats in Bloomsbury Terrace, and the acoustic "hardness" of building surfaces, any noise generated from the premises at the rear of the Telephone Exchange is - as residents can testify - extremely intrusive. The installation of any plant on the rooftops is a potential source of persistent noise nuisance. I also feel that the addition of external terraces on the North Crescent and Alfred Mews facades are unnecessary and would only create the likelihood of further noise.</p> <p>In architectural terms, I feel that increasing the height of the North Crescent facade of the Telephone Exchange - particularly with the proposed terrace - would compromise the architectural integrity of the building, as well as having a detrimental impact on the striking facade of the adjacent Minerva House, a listed building.</p> <p>I understand that, if approved, the proposed development, (involving some demolition as well as construction) is likely to take at least two years; such lengthy works would have a significant impact on nearby residents' "quiet enjoyment" of their homes and garden, particularly given the particular acoustics of the site.</p> <p>Overall, I do not support the plans as currently presented.</p>											



Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	Susan Brewster and Sheila Clifford	01/11/2021 11:03:03	OBJ	<p>We object to the current proposal for North Crescent. The scale of the development will have an irreversible, significant negative impact on our living conditions.</p> <p>We live in 2 habitable rooms, both single aspect, facing directly onto the eastern elevation of Telephone Exchange workshop building in Alfred Mews. We understand that the current two-storey building (not including basement), is proposed to rise to what would be six stories including the rooftop plant. The facade we face in close proximity, is proposed to be a blank wall. The overarching assertion by the applicant is that the development would be a one- storey extension, however this is not the case at the rear of the Telephone Exchange building in Alfred Mews we overlook. What we will see is the solid wall of a building higher than our own, obscuring everything to the west.</p> <p>This would be an overbearing structure, blocking sunlight, daylight and creating plant noise pollution. Our current outlook is outward reaching and looks onto a setting with a variety of architecturally beautiful buildings including Grade 2 and Grade 3 listed set against skyline. The proposed design would be a high magnitude of visual change, replacing our outlook with a blank wall taller than our own building and enclose our only space to create a cave like, oppressive environment for our residents. Our windows and our garden, which is a green space carefully created and maintained by residents over many years, will lose important light. The Daylight/Sunlight report submitted by the applicant is flawed with incorrect assumptions such as flat significance, flat layouts and in fact our own building elevations. It does not take account of our communal garden. Such a report must have 100% accuracy, which should be verified independently by Camden. Nevertheless, the report still acknowledges that all windows in consideration will lose daylight and sunlight.</p> <p>Various documents submitted by the applicant refer to stories and/or floors, some including basement and some not. The fourth floor at Tottenham Court Road or at North Crescent is much higher than the fourth floor of our adjacent residential buildings separated only by a narrow courtyard. Therefore it is difficult to grasp the precise reality of the proposed elevations. What is clear, however, is that the higher elevation, currently Tottenham Court Road, would dominate this confined area of what is now a lower, and varied topography. Given that this is also a conservation area, design that dominates and harms residential amenity in this way could not be considered sensitive, sympathetic or good design.</p> <p>We are also concerned about a number of other aspects of the proposal. A proposed terrace will be intrusive and we will suffer a loss of privacy both in our garden garden and in our flats. The acoustic study completed for proposed plant and fans is incomplete, and without knowledge of equipment and attenuation measures it provides no assurances that we would not suffer from increased plant noise given how near our windows are to the proposed plant. The study also is said to have been carried out against a background of existing plant running, which means that the ambient noise level would be greater than it otherwise would have been. Plant from Fitzroy House (adjoined building) has long breached previous planning conditions, both because of the noise pollution and because the height of acoustic screening exceeds the original permission already blocking our light. Attempts made over the years to trigger enforcement of planning conditions retrospectively has proved next to impossible.</p> <p>For several years through out summer months we have been aware of bat activity in this immediate area directly over Telephone Exchange workshop building and in our courtyard. We have photographic evidence of this. Therefore, a bat survey should be carried out. Demolition and building work would displace the bat population entirely, and light pollution from additional stories in the Alfred Mews means that this would be a</p>

Printed on: 03/11/2021 11:17:40

Application No:	Consultees Name:	Received:	Comment:	Response:
				permanent environmental transformation.  We respectfully request planning authorities to take our concerns to heart and to ensure that Camden's own guidance and policies such as Camden Planning Guidance (CPG) Amenity 2021, Fitzrovia Area Action Plan, and Camden Biodiversity Action Plan are fully and transparently applied.
2021/3704/P	Iris Lazell	21/10/2021 17:22:11	OBJ	As a resident of 9 Chenies Street Chambers I am concerned about the planning proposals regarding Telephone Exchange and Minerva House. This will adversely affect resident quality of life. The height of the buildings will block light into our flats and our communal garden meaning plants will not thrive and also loss of privacy in our homes and our quiet garden space. Another worry is the noise and disruption this building work will cause over a long period of time; and then the noise from the planned roof top extractor fans when finished. These are listed buildings so the architecture is very important.

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	Penando Tumelty	30/10/2021 20:18:47	OBJ	<p>Ronald Tumelty, Flat 19, 9 Chenies Street, WC1E 7ET</p> <p>To Mr Nathaniel Young London, borough of Camden</p> <p>Re Planning applications 2021/3704/P and 2021/4679/L for proposed works at Minerva House, 1-4 &amp; 5 North Crescent, WC1E 7PH</p> <p>Dear Mr Young</p> <p>I am a resident of Chenies Street Chambers, 9 Chenies Street, WC1E 7ET, which backs onto the rear of Minerva House for which this planning application has been submitted.</p> <p>I am writing to express my objections about this proposed development and the consequent effects this would have on the quality of life of local residents if the proposal was successful.</p> <p>The scale of these works would block light and intrude on the privacy for residents at the rear of our building and from the communal garden at the rear. There is already restricted light due to the buildings at the rear and this proposed development would make matters even worse.</p> <p>In addition the works would take over two years with consequent noise pollution for local residents. Over the last 2-3 years we have already had to endure the noise, pollution, disruptions and excess traffic related to the West End Project with Alfred Place, opposite the front of our building, being enclosed and used as a depot for the storage and distribution of materials.</p> <p>The new building works would also involve more office space and consequent increased demand on local facilities such as parking.</p> <p>I would please ask that this development be either prohibited or greatly scaled back to reduce the loss of light and privacy, and the ongoing noise and pollution involved and the consequent effects on Our mental and physical wellbeing being.</p> <p>You're sincerely Ronald Tumelty  </p>
2021/3704/P	Sandy Chang	30/10/2021 00:38:49	OBJ	<p>As a resident of the Bloomsbury Terrace, I strongly object to the extension.</p> <p>The construction work and the 'Plant' will be causing unbearable noise and pollution, and the one storey extension will block sunlight, which is very precious in England. Also, Bloomsbury Terrace is surrounded by one-way roads, the construction will bring in even more traffic and blocked roads making it impossible to get in and out.</p> <p>The construction work will only downgrade the living quality of all residents at Bloomsbury Terrace. Not a good move for the community.</p>

Printed on: 03/11/2021 11:17:40

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/3704/P	Lance Moir	28/10/2021 14:00:18	INT	<p>Chenies St Chambers Leaseholders Association Flat 2 Chenies St Chambers 9 Chenies St London WC1E 7ET</p> <p>Planning Application 2021/3704/P</p> <p>Chenies St Chambers (also know as 9 Chenies St) is a block of 36 flats with a communal garden, originally Victorian which overlooks the above application, and which is the nearest residential block to the proposed development. The Leaseholders Association represents 13 flats in the block, but our comments equally apply to the tenanted flats.</p> <p>As we set out more fully below, we oppose the application principally on the grounds that the proposed extension would dramatically alter buildings of architectural importance in 'Alfred Place Character Area' within Bloomsbury Conservation Area. The resulting building would be overbearing and intrusive harming a number of amenities currently enjoyed by our residents. This would adversely affect the quality of life both within our dwellings and in the communal garden. The adverse effects include but are not limited to, loss of light, loss of privacy, loss of visual amenity, and increased noise and vibration from rooftop plant and fans resulting from the increased roof level to the back of the Telephone Exchange, the workshop building, on Alfred Mews. We do not agree in principle to the demolition and reconfiguration of this building of architectural merit. There are other aspects about which we are also concerned, and which are not dear from the application such as relative elevations of existing and proposed buildings - not least because the focus has been on the North Crescent Elevation and where our concerns relate to aspects which do not relate to road facing aspects.</p> <p>We make the following points:</p> <ol style="list-style-type: none"><li>1. The applications and their consultants, Kanda claim to have undertaken a wide public consultation. We do not believe that the consultation reached local residents. The publication of the consultation speaks to the North Crescent elevation and does not relate to the hidden impacts at the back of the development. Better engagement should have been expected to understand the impacts on residents. Many of the residents in the block are elderly and may not have internet access. It is telling that the first engagement with three of our residents came via a site visit on October 15, 2021 prompted by a member of this association! We note that there had been precisely six responses to this engagement and did not include comments made by all residents. Had there been an effort properly to engage better observations would have been made. We also note that the Daylight/Sunlight Study was not available on the consultation website despite Chenies Chambers having been the main subject of the study that was completed at the time of the so-called consultation.</li><li>2. In a similar vein, we note there have been three pre-planning discussions with LBC and also with BCAAC - yet none with residents directly impacted. Had there been some, we would have been able to engage and hopefully impact the design in the way that has clearly been achieved. We believe that there needs to be better engagement with attendant delays which the applicant and their consultants could have avoided.</li><li>3. The rear of the development overlooks directly onto the rear of 9 Chenies St and its garden, planted with mature trees and shrubs. 18 (half) of our 36 flats have windows directly facing the rear and 12 of those, (1/3 of all flats), are single aspect some comprised of 2 habitable rooms. We note that the applicants consultant, Avison Young (AYI) has presented a detailed Daylight/Sunlight report. Yet their report raises many questions both as to methodology and also as to a selective presentation of its findings. We propose that this report needs to be reviewed significantly and revised, not least by physical investigation rather than relying on a computer model. We make the following points:</li></ol>

Application No: Consultees Name: Received:

Comment: Response:

- a. There is an error in the labelling of stories showing Chenies Chambers without a basement level but starting at ground level rising to the 5th floor. This is incorrect as our building is from basement level to 4th floor identical to next door Mayne house, the other residential building in the study. This raises the question as to whether or not the correct elevation has been used to plot the results. Needless to say, such errors do not give us, who will have to live with the consequences, confidence.
  - b. The floor plans shown are incorrect with numerous inaccuracies.
  - c. Many of the rooms identified as (unknown) are living space
  - d. Some of the rooms identified as (bedrooms) are living space as the layout of the flats allows for inter-changeability. In any case, bedrooms and kitchens are habitable rooms according to both Camden policy and BRE guidelines. It goes without saying that this is especially true when these are the only two rooms in a flat.
  - e. AY appears to have used/included an ADF methodology despite by its own acknowledgement and BRE guidelines, ADF methodology should only be used for newbuilds and not recommended to be used for existing buildings.
  - f. Our own observations from the 3rd floor show the sun disappearing at the proposed height of the Alfred Mews development. The impacts on lower floors will be more extreme and on the lowest floor will remove light completely
  - g. Page 12 (5.5) of AY report refers to a one story vertical extension whereas Alfred Mews is a three story vertical extension plus rooftop plant. This is either a fundamental error or a deliberate mis-representation.
  - h. There is no discussion of the impact of light on the garden
  - i. Para 6.125 of the Planning Statement says:
    - i. "Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)".
    - ii. This is not an application for housing but one for offices which is reducing the amenity of existing housing.
  - j. Para 6.126 of the Planning Statement points out:
    - i. Policy D6 of the London Plan, Housing Quality and Standards, states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximizing the usability of amenity space.
    - ii. As far as we can see overshadowing is not minimised, there is insufficient daylight and sunlight and the usability of the amenity space (garden) is not maximised
  - iii. Para 6.130 of the Planning Statement states:
    1. The daylight and sunlight impact to No.9 Chenies Street is also limited. Where there are isolated impacts that fall below the baseline BRE target criteria, they are minor in nature in Avision Youngs opinion, with the majority of windows and rooms meeting the BRE's target criteria.
    2. We note that this is the opinion of a consultant paid by the applicant. We also submit that the impacts are not isolated nor have the nature of windows been properly considered. That said, AY's report still shows that all residents' windows at the rear would be losing both daylight and sunlight.
4. Camdens own Amenity Planning Guidance makes the following observations which are relevant:
- a. Section 3.16 states:
    - i. In order to provide the Council with greater certainty over the expected daylight and sunlight levels stated

Application No: Consultees Name: Received:

Comment: Response:

within a daylight and sunlight report, the Council may commission an independent verification of the report, which will be funded by the applicant. Independent verification is likely to be required in instances where there is possible dispute regarding the measurements cited or new techniques/technology is used to create daylight and sunlight measurements.

b. Given all the above, we submit that Camden (not least because LBC is the freeholder of 9 Chenies St) should commission a fresh report and base it on actual windows at the expense of the applicant.

c. Sections 3.17 and 3.18 refer to the Right to Light. It is clear that the current limited light will be severely impaired by the development.

5. We understand from the site visit that the visual aspects of the rear of the proposed development will result in a blank wall in close proximity to our windows extending above the adjoined office block, Fitzroy House, plus plant, with a terrace at the third floor facing Alfred mews. We believe that a full independent Residential Visual Amenity Assessment (RVAA) should be undertaken. We are also concerned both about a lack of privacy and the risk of noise. The inevitable noise from an office terrace will impact on what is a quiet domestic setting for many residents.

6. We remain concerned about the roof top plant. Our recent experience with Fitzroy House led to baffling higher than that the original planning permission allowed for, and which already reduced light eventually leading to what has been a long standing noise complaint known to Camden planners. This has been frustrated by ineffective mechanisms for enforcing planning conditions retrospectively. The current Acoustic Study offers little reassurance as much is based on assumptions without confirmation of actual equipment or attenuation measures. In addition the report notes that existing plant may have been running at the time measurements were made to determine background noise levels..

7. It is premature to consider construction periods, given that planning is still underway. But we wish to make it clear that early morning and weekend working is an issue in a domestic setting.

In summary we object to the proposed development for all the reasons stated above. The removal of substantially all the extra floors above the telephone exchange workshop building at Alfred Mews should address this issue. We further submit that whilst the focus of planners and the applicant has been to the visual impact on North Crescent and other matters, insufficient attention has been made to the impact on 9 Chenies Street. Such considerations as there have been dismissed as immaterial or isolated. This is not how it appears to our residents who will lose both daylight and sunlight, and suffer significant detriment to their quality of life should the proposed demolition and extension proceed in its current form.

Lance Moir  
Secretary  
Chenies St Chambers Leaseholders Association

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2021/3704/P	Adam Zumla	24/10/2021 17:52:00	OBJ	<p>The proposed development is substantial to the surrounding residential buildings including my own (Bloomsbury Terrace). It situates the stack/chimney in extremely close proximity to my block of flats. This is especially concerning as the prevailing south westerly wind has the potential to blow (?toxic) pollutant straight into Bloomsbury Terrace having a detrimental to the health of the residents.</p> <p>To add to this, the rise in height of the building, construction, and occupancy of the building afterwards will result in a loss of light and privacy, alongside generation of noise pollution and road disruption for all those in surrounding blocks of flats.</p>
2021/3704/P	Becky Ghani	19/10/2021 20:42:51	OBJ	<p>This will block light and cause noise at the back of our block which has good light and is quiet at the moment.</p>
2021/3704/P	Carol Chan and Sonia Li	29/10/2021 18:06:54	OBJ	<p>We are writing to submit an objection to the full planning permission of Minerva house at WC1E 7ER.</p> <p>As the currently owners of Flat 26 of Bloomsbury Terrace, we express significant concerns regarding the commercial extension along with other tenants and owners of Bloomsbury Terrace. This demolition and construction will significantly affect our neighbourhood.</p> <p>There is currently already a significant amount of construction work on Alfred Place. Recently, we also had the reconstruction of the Royal Ear, Nose and Throat Hospital on Huntley Street. We were significantly disrupted by the loss of privacy and loud noise.</p> <p>We strongly object the refurbishment, reconfiguration and extension of these buildings will significantly affect our mental and physical wellbeing.</p>