

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/1817/P	Catherine Guthleben	27/05/2022 14:50:25	COMNOT	<p>I own a flat in Thanet House. The window of the living room looks directly onto the RNIB building. The two people who live in this flat work from home. One is a Graphic Designer who has their workspace under this window as the only source of natural daylight.</p> <p>The proposed development will block essential daylight.</p> <p>It will overlook and overshadow this living space and the roof terrace above.</p> <p>It will detract from the overall character and amenity of the Bloomsbury Conservation area.</p> <p>The Daylight &amp; Sunlight Impact Report (Part 1) completely misrepresents the impact the development will have.</p> <ul style="list-style-type: none"> <li>• Para 1.7 falsely states that the windows “typically serve bedrooms or very small kitchens”. The window in Flat 157 is for a living room, and receives direct sunlight for many hours each day.</li> <li>• Para 3.6 incorrectly quotes from and relies upon the Housing SPG to justify the reduction in daylight and sunlight. The flexibility referred to is encouraged when the proposed development is residential. This proposed development is entirely commercial, with no residential aspect and this guidance does not apply.</li> <li>• Para 3.17 – if approval is granted it will cause unacceptable harm to amenity, namely sunlight, daylight and overshadowing.</li> <li>• The contextual analysis relies on buildings in Grey’s Inn Road and King’s Cross. It ignores the character of the Bloomsbury Conservation area, which is largely residential and of a much lower profile than the proposed development.</li> <li>• It uses as a study the façade of Sandwich House that faces a narrow internal courtyard. This is not comparable to the present experience of living in a flat in Thanet House facing the RNIB building.</li> <li>• Section 6 misleadingly describes the whole of Thanet House as “mixed use” because of a single commercial premises on the ground floor at the corner of Hastings St. Thanet House is overwhelmingly residential, as is Thanet Street apart from the RNIB building.</li> <li>• Para 7.6 reference to “urban context” to justify the low daylight values is again misleading, when applied to the whole of Thanet Street, and Thanet House in particular.</li> </ul> <p>Statement of Community Involvement</p> <ul style="list-style-type: none"> <li>• I first became aware of this proposal in a circular to residents from a neighbour on 16 May 2022.</li> </ul>

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2022/1817/P	Professor Deirdre Kelly & Sir Ian Byatt	29/05/2022 14:04:22	OBJ	<p>Consultation</p> <ul style="list-style-type: none"> <li>No initial contact was made directly with us by the Developer despite being next door neighbours and to our knowledge, no contact was made directly with several of the residents or businesses in Thanet Street (we were made aware of these plans by Bloomsbury Residents Action Group).</li> <li>We are disappointed that the developers have taken no notice of the concerns raised by many of the local residents, including ourselves of their concerns about the effect of the additional stories on privacy, light and on a unique historic terrace.</li> <li>We did not receive notice from Camden as the Local Planning Authority once the application was submitted despite us being a neighbouring consultee. We therefore consider that the application process is challengeable.</li> </ul> <p>Privacy and Overlooking</p> <ul style="list-style-type: none"> <li>As next-door neighbours we are concerned about the effect of the increased floors and terraces on our privacy and the ability of incoming tenants to overlook our home and gardens.</li> </ul> <p>Noise and Air Quality</p> <ul style="list-style-type: none"> <li>We are concerned about the general increase in noise over 24 hours as we gather the main energy plant for the building will be at roof level and close to our property. We feel this has not been adequately addressed in the planning application.</li> <li>We are concerned about the potential for additional noise from the terraces. This has not been adequately addressed in the planning application. We hope their hours of use will be restricted by the Local Planning Authority.</li> <li>Servicing will take place in Thanet Street. However, it is stated in the application that the incoming tenant is unknown therefore they do not know how many vehicles will be using our street and what hours. How can the Air Quality Assessment be accurate if this point is unknown? We hope servicing will be restricted by the Local Planning Authority.</li> <li>Once built how much disruption will there be with ongoing deliveries, and will they respect working hours?</li> <li>We are also concerned about the effect of the demolition on the stability of our 1820 property as well as the inevitable dust and disruption during the building process.</li> </ul> <p>Daylight/Sunlight</p> <ul style="list-style-type: none"> <li>We are concerned about the impact of the planned extra height on the daylight/sunlight of our home, garden and neighbouring properties. Has the developer assessed our rear windows at low level? We understand the developers have carried out an assessment of the effect on the additional height (at all levels) on the light in our property and found that it is not impaired. We strongly disagree.</li> <li>We note that the developer's own Daylight and Sunlight Report conclude that 47% of the windows in Thanet House would not adhere to BRC guidelines for VSC but consider that this is not significant as these rooms include small kitchens and bedrooms, both of which are habitable and thus have a right to natural light.</li> <li>In the same way, they have dismissed any possible effect on our property as only affecting hallways,</li> </ul>

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				<p>bathrooms, or kitchens. In our property, the hallway (which provides most of the light to the house on all floors); our conservatory (which would be immediately below the proposed increase of one metre of the wall behind our party wall) and the kitchen which already has low light would be impaired directly by the increase in height of the wall closest to our property. In addition, this high wall and 'bridge' between the buildings will affect our exterior space, dwarfing our conservatory and patio, creating an enclosed space, as if we were at the bottom of a well. This aspect of their development has not been considered or commented on.</p>

#### Conservation

- The NPPF requires applications to consider the impact and potential harm of new development on Heritage Assets. Our Grade II listed terrace is a unique part of the Burton Estate as it consists of only three stories in contrast to the majority of Georgian houses which have four or more stories. We have not seen any assessment which considers the impact of this development on our homes. We have not received any notification of a Conservation Area Consent application and a Heritage Impact Assessment which we are keen to see.
- Most importantly, we do not believe that sufficient attention has been paid to the physical and visual impact of a significant increase in height on a rare terrace of Listed Grade II houses in an historic Conservation Area.

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2022/1817/P	Jessel House Residents Association	29/05/2022 21:01:54	OBJ	<p>The Jessel House Residents Association submits the following:</p> <p>"The proposed development is not in keeping with the stylistic context of our neighbourhood. 105 Judd Street is a smart Edwardian facade which sits well on Judd Street, complimenting the edwardian buildings opposite (Jessel House and Queen Alexandra Mansions) and which abutts a row of listed Georgian townhouses to the north. The brash glass extension proposed to the building clashes with all of the neighbouring buildings and is not suitable for a conservation area.</p> <p>The proposed upward extension will severely overlook the living and bed rooms of Jessel House immediately opposite across Judd Street (nearly all of the living and bed rooms of Jessel House are on the West side of our building) This will cause distress and inconvenience to our residents."</p>
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2022/1817/P	Stephen Cowan	27/05/2022 18:40:09	OBJ	<p>As a resident of Thanet House, Thanet Street, across the road from the subject building, I object to the proposal in its present form.</p> <p>The existing RNIB building is roughly the same height as our block. Adding extra storeys means our block will be overlooked, with loss of privacy both within flats and on our roof gardens.</p> <p>Further, I fear this being exacerbated by the proposed introduction of roof terraces at levels three, four and five for use by building tenants between 8am to 8pm Mondays to Fridays (as described in section 5.3, page 15 of the Town Planning Statement by Gerald Eve and despite the reassurance in section 12.16, page 48 of the same statement). Such a proposal prompts concerns about noise as well as loss of privacy in our block.</p> <p>Thirdly, the proposed significant increase in height to a building with a substantial footprint would give an oppressive appearance to our street and the immediate surroundings.</p> <p>Whilst I do not challenge the right of developers to refurbish the interior of the building, I suggest that a more modest design for the exterior should be found, more in sympathy with, and less deleterious, to the locality.</p>

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2022/1817/P	Sarah McKenzie	29/05/2022 20:45:41	OBJ	<p>RE: Objection to Planning Application Number 2022/1817/P, 105 Judd Street, made to the London Borough of Camden.</p> <p>I am writing to object to the proposed height extension to 105 Judd Street based on the negative impact it would have on the surrounding conservation area, Jessel House residents, as well as its proposed use for Life Sciences.</p> <p>The developer's consultations with local residents and businesses have been disingenuous. During the webinar consultation they were unwilling to answer directly what the additional height of the building would be resulting from rebuilding and extending the third floor, adding a fourth and fifth floor. They implied the refurbished building's height would be level with the height of the existing tower. In reality the developers are planning for the upward extension to be at least twice that height, with the building plant facilities above this. Their lack of transparency has undermined the whole consultation process and suggests the results of the various reports submitted as part of the application are unreliable.</p> <p>I have grouped my objections as follows:</p> <ol style="list-style-type: none"> <li>1. Impact on local area and streetscape</li> <li>2. Impact on access to light, the sky and privacy</li> <li>3. Threat posed to existing commercial entities</li> <li>4. Overprovision of Life Science office space in the area</li> <li>5. Life Science facilities should not be located in a dense residential area</li> <li>6. Developer's justification for oversized upper extension</li> <li>7. Additional Noise</li> <li>8. Conclusion</li> </ol> <p>1. Impact on local area and streetscape</p> <p>The proposed upper extension is completely out of keeping with the conservation area in which it is located. 105 Judd Street is itself an elegant Edwardian façade, which sits well on Judd Street, complimenting the Edwardian buildings opposite (Jessel House and Queen Alexandra Mansions) and which abutts a row of listed Georgian town houses to the north. The proposed extra floors will add excessive height to the building and will be inappropriate for an area of historic and much lower buildings which run down either side of 105 Judd street. The forbidding, dark grey upward 'Blade Runner' style extension will dominate the currently attractive look of the street and is totally out of character with this section of Judd Street, Thanet Street and Hastings Street.</p> <p>2. Impact on access to light, the sky and privacy.</p> <p>All the flats located in Jessel House will have their access to light severely restricted by the disproportionate height extension with the view of the sky entirely cut off for many. The additional floors and window will invade the privacy of the living rooms and bedrooms of flats in the building. Any one of these three issues alone would result in an unacceptable loss of quality of life and wellbeing for all residents and should result in the planning application being rejected but with the three together it must be rejected.</p> <p>The theoretical analysis to the impact of light undertaken by the developer to the front of Jessel House is inaccurate and should be ignored by the planning committee</p> <p>3. Threat posed to existing commercial entities</p>

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The developer is proposing to include a café and community space on the ground floor of 105 Judd Street and claim that this is one of the reasons they need such a huge height extension. However the proposed commercial entity will threaten the businesses of the three existing cafés (Nonos, Half Cup and Thenga) and the pub (Skinners Arms) on Judd Street located between Hastings Street and Cromer Street. There are also many cafes and restaurants within easy walking distance – many of which are struggling to survive post the pandemic.

There are also many community spaces within easy walking distance – these include Central YMCA at KX on the corner of Judd Street and Cromer Street as well as The Marchmont Community Centre, The N1C Centre, Five Pancras Square and The Mary Ward Centre.

There is no evidence that these proposed facilities are necessary or desirable on this small stretch of Judd Street.

The developer is once again being disingenuous to propose a need for them when there clearly is not.

#### 4. Overprovision of Life Sciences office space in the area

The local area is well provided with both environmentally friendly and traditional office space – with many new developments still being built. In addition, the British Library, the 10 story office and research building for US pharmaceuticals giant Merck opposite King's Cross station and the works on Grays Inn Road are all providing new office space for the Life Sciences. Clearly there is an over provision of both office space and in particular Life Science office space in the area.

This type of speculative development should not be allowed in an area already over-provided with ecological and traditional office space, especially at a time when fewer people are regularly working in centralised offices.

#### 5. Life Sciences facilities should not be located in a dense residential area

Life sciences comprise the branches of science that involve the scientific study of life – such as microorganisms, plants and animals including human beings. Animals experiments are commonly used for life science research as is generating miroorganisms that can be dangerous to the environment, wild life, human beings and domestic animals - should there be an accident.

This development could:

- Encourage the cruel and unacceptable use of animal experimentation in a residential area, and
- Endanger the local environment, local people, wild life and domestic animals

Camden Council should not support a planning application where the location of the facilities could endanger the local community and support unethical practices.

#### 6. Developer's justification for oversized upper extension

The developer has justified the need to greatly extend the height of the property (the third floor, adding fourth and fifth floors and then locating the building plant on top of these additions) as:

- The need to include a café and community space – both of which are clearly not required given the extensive supply of both in the immediate and wider local area (see 3. Above)

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2022/1817/P	Ann MacLarnon	28/05/2022 10:04:30	OBJ	<p>I am a resident of Thanet House. Typically for the building, my flat has both sitting room and bedroom windows opposite 105 Judd St. The proposed extensions would impact negatively on the natural light, privacy and tranquility of our homes. The extra mass of the new floors would be out of proportion for a small, narrow street such as Thanet St., especially in a conservation area. The proposal to create a roof terrace and cafe would isolate office workers in the building from the surrounding community, impacting negatively on local businesses and community interaction.</p>

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