

From: L O
Sent: 13 November 2022 22:17
To: Planning Planning
Cc: David Fowler; SaveMuseumStreet@coventgarden.org.uk;
Rosamund Oudart
Subject: OBJECTION 2021/2954/P One Museum Street

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear members of the planning committee.

My name is Laurene Oudart. I am the daughter of Rosamund Oudart (cc'd in this email), a dual British French citizen, who is proud to call Bloomsbury her home since 2009.

I am currently following the process to be registered as my mother's carer. My mother is 72 and has been suffering from high anxiety following sad life events. I copied my mother in this email and I am writing this objection on her behalf. My mother is feeling overwhelmed by the proposed development and is not able to efficiently use modern ways of communication.

My mother currently resides on the
a . We attended the meeting with
Simtem and two representatives visited my mother on two separate occasions. I joined her both times in order to support her.

Objection on the ground of loss of light causing unacceptable harm

I have reviewed the daylight/sunlight assessment provided by the developer and read the part impacting my mother's flat. The developer acknowledges that the loss of light constitutes harm but claims that the harm is not "unacceptable". My mother's flat only has two windows and the loss of light is in breach with BRE guidelines as it exceeds 40%. When we raised this issue with the developer's representative, the only thing we were told was to seek legal advice. My mother is retired and living off a pension, we will need to combine our savings in order to pay for legal fees. I am currently in contact with a building surveyor specialised in the right to light and I am also looking for legal representation.

I would like to challenge the statement that the harm is not considered as "unacceptable" as the high loss of light measured will heavily affect my mother's quality of life and worsen her already fragile mental health.

Let me please refer to the daylight/sunlight assessment:

page 1:

1.2 The National Planning Policy Framework (July 2021) ("NPPF") outlines that 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 an efficient use of a site"*.

When considering daylight and sunlight for future occupants, the NPPG asks local planning authorities to consider whether "satisfactory living conditions" are achieved within future development and whether there would be an "unreasonable impact" on daylight and sunlight amenity to neighbouring occupiers.

1.5 Policy A1 of the Camden Local Plan (July 2017) states that new development will be granted permission unless it causes "unacceptable harm to amenity" (our emphasis), the supporting text clarifies that daylight, sunlight and overshadowing are considered part of amenity. The policy recognises that daylight and sunlight condition within neighbouring properties may cause some degree of harm, as well as overshadowing can occur, but it is to be considered whether it is "unacceptable".

My mother's property was refurbished after being granted planning permission in 2006. She is NOT a future occupant but an existing one and I argue that the daylight and sunlight conditions will incur unacceptable harm. The argument that the report makes on p20 5.35 stating that the building used to be a commercial building is irrelevant. Since it was granted planning permission to be refurbished by the council, it should solely be considered as residential.

page 2:

1.12 Within this report, we have also considered recent decisions from the GLA and Planning Inspectorate in which a flexible approach to the BRE Guidelines is employed and wherein a mid-teen value is considered an "acceptable" level of VSC and a value of 20% VSC or more is considered "reasonably good" for an urban context. *We have also considered other material factors which are relevant when determining whether the harm of daylight and sunlight is acceptable, such as the relationship between 7 Grape Street and 14 West Central Street (acting as a projecting wing) as well as restricts the narrow streetscape of Grape Street and Drury Lane which also limits the available daylight and sunlight.*

Please note that no access was requested to my mother's flat when making this assessment. The projecting wing is below her windows and I fail to understand how it impacts the amount of light. The main factor in the light availability is the Travelodge which will be replaced by a tower 21 metres taller. This is the real reason which will impact future light availability.

P8:

4.14 Policy A1 of the Camden Local Plan (2017) seeks to ensure that standard of amenity are protected. It states that 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" (our emphasis).

There are several factors the Council have identified as contributing to amenity, which includes “sunlight, daylight and overshadowing”. The policy recognises that harm to daylight and sunlight condition within neighbouring properties, as well as overshadowing can occur, *but it is to be considered whether this is “unacceptable”*.

The developer states itself that it is the council duty to stop development causing harm to current occupiers and neighbours which is the case in this instance.

P19:

5.31 The final 13 windows will experience changes in excess of 40% and are located on the first, second, third and fourth floors of the property. 11 of these will retain between 10-14% and whilst this is short of the BRE recommendations given the Site has been designated for development and growth and this element of the Site has been allocated for redevelopment, lower daylight values to this property are expected should any meaningful massing be achieved on the Site. The final two windows will retain 2% VSC, however they already have low levels of VSC in the existing condition and therefore the absolute reductions of 5% VSC are unlikely to give rise to noticeable changes given the low levels of VSC in the existing condition.

Does the council consider that 2% VSC does not constitute unacceptable harm ? The developer has not changed his plans compared to what was previously proposed. Despite what it is claiming on its website, it is obvious that the developer does not care about local communities and their wellbeing. Can the developer explain what they mean by "meaningful massing" ? Shall it be understood as achieving maximum profit to the detriment of local communities and in breach of the right to light and loss of amenity ?

Other objections grounds

- Environmental impact

I am working in the domain of sustainability for a leading rating agency and building operations account for [27% of annual CO2 emissions](#). The developer is proposing to wipe out an existing building and rebuild something higher thus damaging the environment and contributing to climate change.

- Impact on a conservation area

Even though the tower is slightly shorter than in the first proposal, 74 metres is way higher than all surrounding buildings and will damage neighbouring historical landmarks in addition to the infringement to the right of light detailed above.

- Lack of social housing

The developer plans to build 48 new homes but will destroy 18 existing ones and only offer 9 "low-cost" rent which is well below what we should expect. Nobody will be able to rent these "affordable flats" unless they learn at least £65K per year which is twice the average Londoner's salary. The other flats will be sold at market price which means they will end up in the hands of foreign investors. Do you want London to be bought out by people who do not care about the local community ?

- Lack of future office occupancy rationale

In addition, the project includes a large share of offices. I am sure you are aware that Great Britain is facing recession and high inflation. This means that multinational companies (Twitter, Meta, Google...) are trying to cut costs. After laying off people, the second thing they look at is rationalising office rent. You are also surely aware of the impact of the pandemic on office work. Office space usage has decreased significantly and all these factors mean that the proposed tower may well remain empty. I am residing in [redacted] where you had many developments in the past few years and I am happy to send you pictures of empty offices.

I will be soon in touch with the report from the appointed building surveyor and a letter from a solicitor.

Please feel free to contact me to reply to this objection. DO NOT contact my mother as I am acting as her representative.

Regards,

Laurene Oudart