

From: [Hart, Liam](#)
To: [DBE - PLN Support](#)
Subject: FW: 17/01207/FULMAJ Objections
Date: 15 January 2018 11:04:55

From: Matthew Rimmer [REDACTED]
Sent: 09 January 2018 21:08
To: Hart, Liam <Liam.Hart@cityoflondon.gov.uk>
Cc: Holmes, Ann <Ann.Holmes@cityoflondon.gov.uk>; Ann Holmes [REDACTED]; Regan OBE, Richard (Deputy) [REDACTED]
Subject: Re: 17/01207/FULMAJ Objections

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

On 31 Dec 2017, at 10:20, Matthew Rimmer [REDACTED] wrote:

Liam

Please find below my objections to the proposed:

1. Concern around the increase in the number of windows in the internal courtyard. Even though windows are obscured they are still translucent and the potential for light spillage.

There is an expectation as with the original design that there be an IMPACT ASSESSMENTS on the internal courtyard particularly as windows are proposed to increase to 63 (plus skylights) increase is from 77.68sqm to 123sqm.

2. Within the internal courtyard a vent has been added. This is of particular concern due to air quality and noise issues.

Additionally a riser has been added with the vents being adjacent to Flat 4 Lambert House and opposite Flat 1 Lambert House.

A flue also has been added.

3. The location of a plant room on the first floor with vents onto the internal courtyard does not work from air quality and noise perspective. Directly opposite and adjacent to residential neighbours.

4. Sub station has been moved from basement level to ground floor in Ludgate Square this is next to 2 Ludgate Square and opposite 1-3 Ludgate Square (all

residential). We need a NOISE IMPACT STUDY as noise can transmit through the doors and building.

5. More clarity is needed on the air conditioning units and where they will be situated.

6. The plant that was previously on the 6th floor had been removed and been replaced by bedrooms. These bedrooms will directly overlook my neighbour and his terrace [at 1-3 Ludgate Square](#)

7. The roof plan has been amended so the plant is now spread over the southwest perimeter of the courtyard surrounding Lambert House.

8. Concern on the Courtyard elevation AA on the 6th floor proposals show an extension to the build. We are daylight and sunlight sensitive so would request a NEW DAYLIGHT AND SUNLIGHT REPORT plus review by CoL employed daylight and sunlight experts too. If this is an error of the drawings they need to be amended so they are correct. A hedge is also noted on the proposals, this needs removing.

9. 3D image of the heights has not been included in the new proposal. It is essential this is provided.

10. "Increase in parapet heights to accommodate roof construction" the drawings are not consistent and do not show all proposed new heights. These need to be properly reflected.

11. Material impact on servicing due to the redesign and increase in bedrooms.

Please confirm receipt.

Many thanks

Matthew Rimmer

Wells, Janet (Built Environment)

Subject: FW: 17/01207/FULMAJ Objections

From: richard regan

Sent: 31 December 2017 11:24

To: Hart, Liam <Liam.Hart@cityoflondon.gov.uk>

Cc: Matthew Rimmer Hayward CC, Christopher

Subject: Fw: 17/01207/FULMAJ Objections

Dear Liam

Please add my name to the list of Objectors as set out in Matthew Rimmer's E mail of Sunday 31st December and as below

I support all his Objections and what is now being proposed is NOT what was submitted - it compounds the objectionable features and presents additional unacceptable features

Please acknowledge receipt

R D Regan OBE Deputy for Farringdon within

----- Forwarded Message -----

From: Matthew Rimmer

To: Ann Holmes richard regan

Sent: Sunday, 31 December 2017, 10:21

Subject: 17/01207/FULMAJ Objections

Liam

Please find below my objections to the proposed:

1. Concern around the increase in the number of windows in the internal courtyard. Even though windows are obscured they are still translucent and the potential for light spillage.

There is an expectation as with the original design that there be an IMPACT ASSESSMENTS on the internal courtyard particularly as windows are proposed to increase to 63 (plus skylights) increase is from 77.68sqm to 123sqm.

2. Within the internal courtyard a vent has been added. This is of particular concern due to air quality and noise issues.

Additionally a riser has been added with the vents being adjacent to Flat 4 Lambert House and opposite Flat 1 Lambert House.

A flue also has been added.

3. The location of a plant room on the first floor with vents onto the internal courtyard does not work from air quality and noise perspective. Directly opposite and adjacent to residential neighbours.

4. Sub station has been moved from basement level to ground floor in Ludgate Square this is next to 2 Ludgate Square and opposite 1-3 Ludgate Square (all residential). We need a NOISE IMPACT STUDY as noise can transmit through the doors and building.

5. More clarity is needed on the air conditioning units and where they will be situated.
6. The plant that was previously on the 6th floor had been removed and been replaced by bedrooms. These bedrooms will directly overlook my neighbour and his terrace [at 1-3](#) Ludgate Square
7. The roof plan has been amended so the plant is now spread over the southwest perimeter of the courtyard surrounding Lambert House.
8. Concern on the Courtyard elevation AA on the 6th floor proposals show an extension to the build. We are daylight and sunlight sensitive so would request a NEW DAYLIGHT AND SUNLIGHT REPORT plus review by CoL employed daylight and sunlight experts too. If this is an error of the drawings they need to be amended so they are correct. A hedge is also noted on the proposals, this needs removing.
9. 3D image of the heights has not been included in the new proposal. It is essential this is provided.
10. "Increase in parapet heights to accommodate roof construction" the drawings are not consistent and do not show all proposed new heights. These need to be properly reflected.
11. Materiel impact on servicing due to the redesign and increase in bedrooms.

Please confirm receipt.
Many thanks
Matthew Rimmer

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: 17/01207/ FULMAJ objection

-----Original Message-----

From: Ann Holmes [
Sent: 01 January 2018 09:53
To: Hart, Liam <Liam.Hart@cityoflondon.gov.uk>
Subject: 17/01207/ FULMAJ objection

Dear Liam

I am writing to object to the proposed changes.

In summary, I think the changes in glazing, plant design and location and vent, riser and flue placement will cause daylight and sunlight and smell and noise problems for existing residents in Lambeth House and 1-3 Ludgate Square.

I concur with the comments of Matthew Rimmer and with the need for the assessments and studies he cites.

Many thanks

Ann

Ann Holmes
Common Councilman for Farringdon Within

Sent from my iPad

Wells, Janet (Built Environment)

Subject: FW: 17/01207/FULMAJ Objections

>
> -----Original Message-----
> From: Ken Rimmer
> Sent: 04 January 2018 14:21
> To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; Hart, Liam <Liam.Hart@cityoflondon.gov.uk>
> Subject: 17/01207/FULMAJ Objections
>
> Dear Mr. Hart
>
> Please add my name to the list of Objectors to the latest proposed amendments to the above plan. I fully support the objections submitted by Matthew Rimmer in his email to you dated 31 December 2017.
>
> Ken Rimmer
>
> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: FORMAL OBJECTION - Revised Hotel Proposals for Creed Court. Ref 17/01207/FULMAJ

Subject: FORMAL OBJECTION - Revised Hotel Proposals for Creed Court. Ref 17/01207/FULMAJ

Hello Liam

Further to the details of this proposal, it seems that this is an attempt to get around all the earlier agreements and conditions imposed by The City of London Planning Authority. Therefore I would like to formally object and highlight my reasons below.

The increase in hotel rooms is so significant that almost all of the previous objections to massing, sky line, facades, elevations, overlooking and Daylight Sunlight calculations as well as noise, air quality, glazing, servicing for increased numbers, footfall and road traffic etc. that perhaps a **Full Resubmission** for Planning Permission should be required in order to accurately perform Due Diligence.

The overall effect of these proposed revisions totally changes the effects to the local area.

In particular but not exclusive are concerns regarding:

1. Total number of windows both external and internal to the Courtyard.
2. Full impact assessment to The Courtyard area as affecting Lambert house.
3. Vents, flues, risers for noise fumes and air quality.
4. Full details of proposed plant for new locations with regard to impact on Lambert House.
5. Full details of proposed substation at ground level adjacent to Lambert House and possible need for explosion protection depending on the enclosed plant and vibration impact.
6. Daylight/Sunlight assessments to be carried out again due to the proposed changes and the impact on Lambert House as previously acknowledged.

I look forward to hearing from you regarding next steps.

Sincerely

1.

From: [Wells, Janet \(Built Environment\)](#)
To: [Hart, Liam](#)
Cc: [Wells, Janet \(Built Environment\)](#)
Subject: FW: Comments for Planning Application 17/01207/FULMAJ
Date: 08 January 2018 11:36:26

From: PLN - Comments
Sent: 05 January 2018 16:06
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Comments for Planning Application 17/01207/FULMAJ

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 4:04 PM on 05 Jan 2018 from Mr Nicholas Bailey.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square London EC4M 7AA

Proposal: Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 49 (approved drawings) of planning permission dated 06 October 2017 (ref: 14/00300/FULMAJ) to enable (i) removal of third basement level; (ii) internal reconfiguration to create 152 hotel rooms and associated alterations to the fenestration on Ludgate Square and Creed Lane; (iii) relocation of the UKPN sub-station from basement to ground floor level; (iv) reduction in A3 (restaurant) floor area from 1,028sq.m to 478sq.m and relocation of the restaurant entrance door to Creed Lane; (v) reconfiguration of the waste storage facilities and service area; and (vi) other minor internal and external alterations.

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr Nicholas Bailey

Email:

Address: Flat 22 3 Ludgate Square London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: We note with dismay that plans for the 6th floor have been changed such that the 6th floor plant has been moved and it is now proposed that hotel bedrooms are now accommodated on the sixth floor, with new windows directly

overlooking our property and, in particular, our external amenity space.

As the City of London Planning Team is aware from their visit to our property relating to a different application, as Ludgate Square is such a narrow street the façade of the proposed development will be extremely close to our property such that the proposed accommodation would result in a significant loss of privacy. This would further be exacerbated by the fact that the accommodation would primarily be in use during evenings and weekends, unlike the existing office building on the site - precisely the times when we use our outdoor amenity space.

Furthermore, the additional bulk and height attendant with providing accommodation on this floor (which we note is poorly defined in the applicant's drawings) will result in significant overshadowing and loss of visual amenity.

We therefore object to the proposed changes on the above grounds, in the strongest possible terms.

Nick and Max Bailey
Flat 22
3 Ludgate Square
London EC4M 7AS

5 January 2018

Reference: 17/01207/FULMAJ objection.

Dear Liam,

We are writing with regard to the revised plans for the approved Creed Court hotel development referenced above.

We note with dismay that plans for the 6th floor have been changed such that the 6th floor plant has been moved and it is now proposed that hotel bedrooms are now accommodated on the sixth floor, with new windows directly overlooking our property and, in particular, our external amenity space.

As you are aware from your visit to our property relating to a different application, as Ludgate Square is such a narrow street the façade of the proposed development will be extremely close to our property such that the proposed accommodation would result in a significant loss of privacy. This would further be exacerbated by the fact that the accommodation would primarily be in use during evenings and weekends, unlike the existing office building on the site - precisely the times when we use our outdoor amenity space.

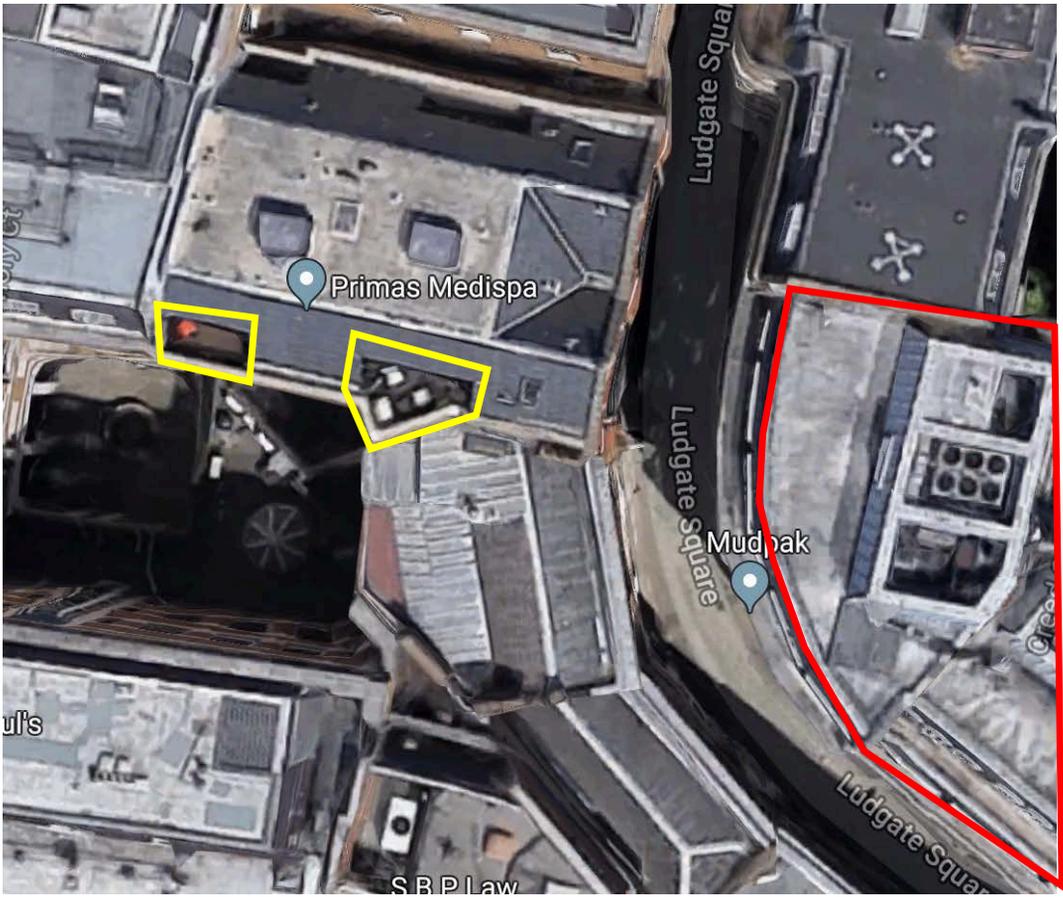
Furthermore, the additional bulk and height attendant with providing accommodation on this floor (which we note is poorly defined in the applicant's drawings) will result in significant overshadowing and loss of visual amenity.

We therefore object to the proposed changes on the above grounds, in the strongest possible terms.

Please refer to the photographs, Figs 1,2,3,4 on the following pages for a compelling illustration, in addition to your personal knowledge of the site, of the affect that this proposal would have.

Yours sincerely, Nick and Max Bailey

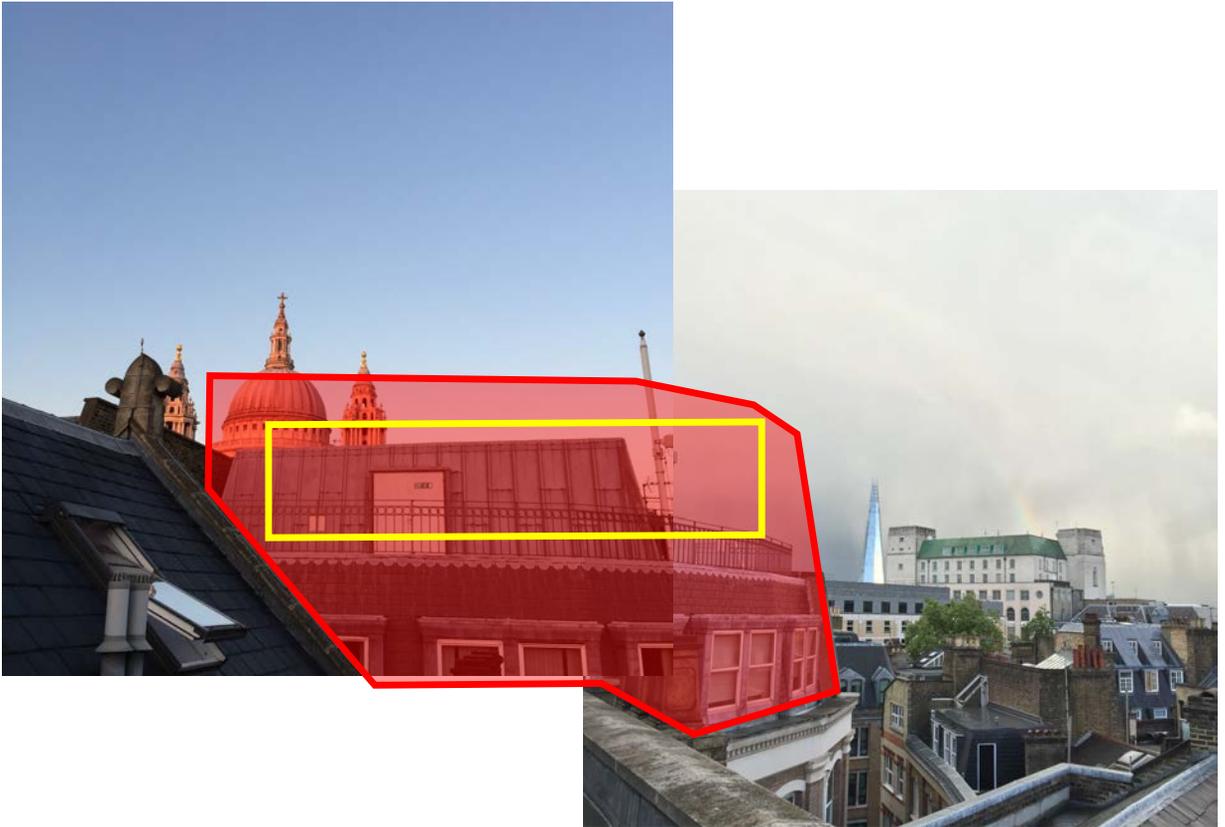
Fig 1



Key

- Outline of proposed 6th floor accommodation
- Outline of Flat 22, 3 Ludgate Sq. amenity terraces

Fig 2

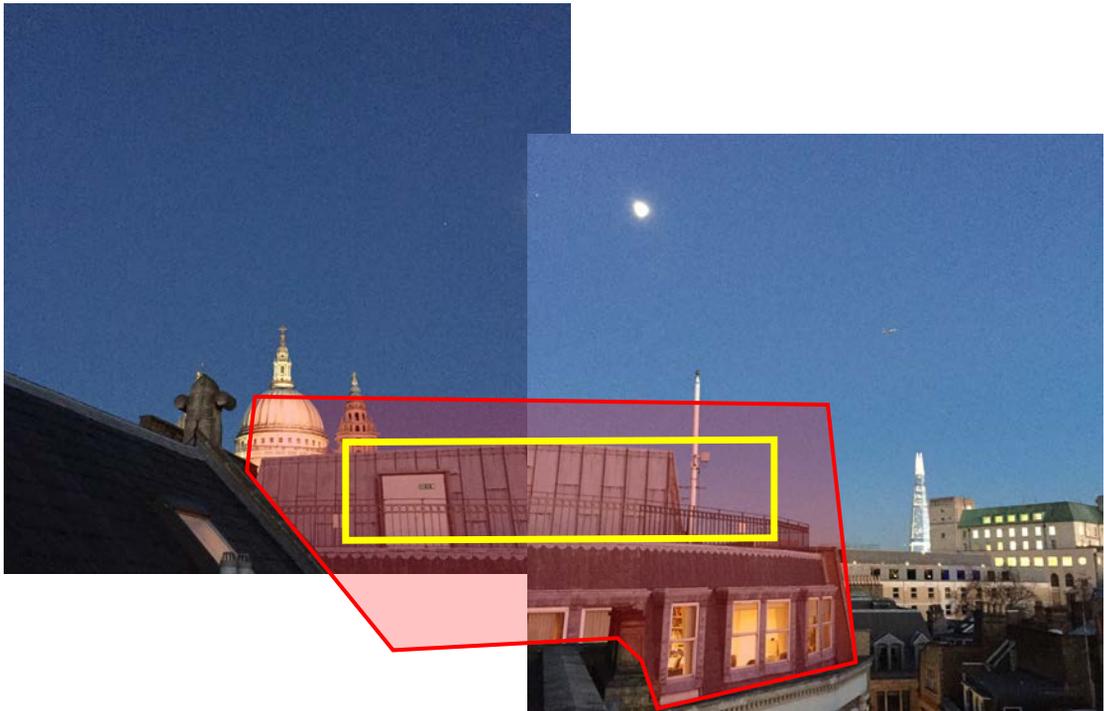


Daytime view from Flat 22, 3 Ludgate Square living room terrace.

Note the overshadowing and loss of visual amenity attendant on the increased bulk and height (outlined red) - which although estimated will certainly be higher than the existing plant floor on the current building.

Note particularly the egregious loss of privacy from the proposed new windows (approximate position outlined yellow).

Fig 3



Night time view from Flat 22, 3 Ludgate Square living room terrace.

As fig 2, additional note on how lighted windows (as we can see here on the lower floor of the existing building), will at night create a sense of being extremely overlooked. We would be able to see directly into the lighted hotel bedrooms and anyone in these rooms would be practically eyeball-to-eyeball with us, just a few metres away.

Fig 4



Day time view from Flat 22, 3 Ludgate Square bedroom terrace.

This second terrace is directly outside the bedroom of our property, as can be seen from the approximate location of the proposed new windows, outlined yellow, we would not be able to use this terrace without being directly observed by anyone in the hotel bedrooms opposite, resulting in a complete loss of privacy.

From: [Wells, Janet \(Built Environment\)](#)
To: [Hart, Liam](#)
Cc: [Wells, Janet \(Built Environment\)](#)
Subject: FW: OBJECTION - Creed Court Planning Application 17/01207/FULMAJ
Date: 08 January 2018 12:20:00

From: M Bajaj
Sent: 07 January 2018 01:23
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Cc: Hart, Liam <Liam.Hart@cityoflondon.gov.uk>
Subject: OBJECTION - Creed Court Planning Application 17/01207/FULMAJ

I am writing to formally OBJECT to the revised planning application for Creed Court, Planning Application Ref **17/01207/FULMAJ**.

The main objections are:

1. Of greatest concern is the proposal to have a riser with vents that will be placed next to our property, Flat 4 Lambert House. This will add additional noise and pollution and prevent us from being able to open our bedroom window due to fear of pollutants entering our bedroom as well as restricting our enjoyment of quiet occupation.
2. Our bedroom window faces the Courtyard and therefore the increased number of proposed windows is of concern to us. We do not think it is acceptable to have so many facing us, even if translucent.
3. We have concerns about the restriction of light into our property from the Courtyard as a result of this submission. There is already restricted light into the Courtyard and we believe this will have a further material negative impact.

We request this application be REJECTED.

Kind regards,

Mr M. Bajaj
Flat 4 Lambert House
2 Ludgate Square
London
EC4M 7AS

From: [Sehmi, Amrith](#)
To: [Hart, Liam](#)
Subject: FW: Formal objection - Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (ref:17/01207/FULMAJ)
Date: 11 January 2018 16:00:00

From: Michael Tang
Sent: 08 January 2018 21:01
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; Hart, Liam <Liam.Hart@cityoflondon.gov.uk>
Subject: Formal objection - Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (ref:17/01207/FULMAJ)

Dear Mr Hart

I am writing to register objections to the amendments to the planning application for Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (17/01207/FULMAJ).

The proposed increase in the number of hotel rooms to 152 (a 15% increase from the 132 rooms which were approved) and the changes required to accommodate the increase in rooms are so significant that the objections lodged against the original application become relevant again, namely the increase in the mass of the building, the reduction in daylight and sunlight, noise and air pollution and loss of privacy. Additionally, there are further concerns over servicing, traffic and noise as a result of increased customer numbers.

I am concerned that the amendments are so significant that, in order to undertake proper due diligence, the full application (taking account of the proposed amendments) should be reviewed again for planning permission.

In addition, I have objections to specific proposed changes.

1. Introduction of vents within the internal courtyard

The plant room will be located on the first floor with vents onto the internal courtyard. A riser has been added with the vents being directly opposite to my flat which will be adversely impacted by noise and air quality issues.

2. An increase in the number of windows in the internal courtyard

Over 60 new windows are proposed in the internal courtyard. This represents a 58% increase in the area of windows in the internal courtyard (from 78m² to 123m²). This is an unreasonable increase in the number of windows which will impact the loss of privacy.

3. Relocation of the sub-station to ground level

The sub-station will be moved from the basement to the ground floor level next to 2 Ludgate Square and opposite 1-3 Ludgate Square. These are residential buildings and, being on the ground floor, the noise can transmit through the doors and building.

4. Changes to the 6th floor

The courtyard elevation on the 6th floor proposals appear to show an extension to the building. The plant which was originally on the 6th floor has been removed and is replaced

by bedrooms. The plant is now spread over the southwest perimeter of the courtyard surrounding Lambert House. This appears to be an increase in the proposed height which will result in a further loss of daylight and sunlight and privacy.

5. Air conditioning units

It is not clear where the air conditioning units will be situated. More information is required as these will cause issues with noise and air quality.

Yours sincerely,

Michael Tang

Flat 1, Lambert House, 2 Ludgate Square, London, EC4M 7AS.



9th January 2018

Department of the Built Environment,
City of London

2017/01207/FULMAJ

CREED COURT SITE

Dear Sirs,

We write to object to the amendments to the proposed design of the building, which make a number of changes we regard as significant.

Broadly, we endorse all that Matthew Rimmer said in his letter of objection.

We would wish however to emphasise some particular aspects. First, you will remember that the application only narrowly squeezed through to gain consent, notwithstanding the views of some of the senior lawyers who were on the Committee that the proposals did not properly respect the City's policies. The principal objections were in respect of light, massing which amounted to over-development, intrusive noise, overlooking and "neighbourliness".

A particular feature of the revised plan is to increase the massing at level 6, so that instead of being tiered back in profile, from the "lip" of the light-well, an additional block of (presumably) rooms has been added. This is bound to affect light – it could not do otherwise.

We have had cause to draw attention previously to the partisan nature of GIA's comments regarding light. Sadly, the letter supporting the present application is no better: it recognises that bulk and massing are the critical factors (end of second paragraph), accepts they have increased at roof level (so that it is clear the relevant factors have altered) and appears to accept this again in the last paragraph. You might therefore think it to be inevitable that there would be some effect on light. GIA's reason for thinking that the light will not be affected is a non-sequitur: – "The changes currently proposed are aimed at the optimisation and functionality **of internal layouts, thus** the main bulk and heights of the massing remain the same" (emphasis added). In other words, the bulk and massing are altered, but because that's to increase internal space, it doesn't affect light. That's nonsense: what matters is the external not the internal layout. Since they accept there has been some change – and it cannot be to our advantage.

It is clear that given the already swingeing effects on light of the original proposal, and the lack of reliability of GIA's comments, a further analysis of light is needed.

Next,(a) it is not clear what acoustic (and vibration) protection there will be from the substation to be built right up against the flank wall of our properties: without this clarity, it must be assumed there is there is a real risk of noise/vibration. (b) The switching on and off of lights at all times of day and night in hotel rooms overlooking the courtyard causes further difficulties for the amenity of our properties, (c) the fact of such windows increases significantly the risk of overlooking and (d) additional mass has been added to an already heavily developed site. In short, each of the earlier objections, which so nearly carried the day before, now has added force by the new plans submitted, we note, by different architects.

The proposed amendments cannot be supported by the evidence thus far produced, and the application should be rejected: alternatively, deferred for further investigation, detail and consideration.

Yours,

Brian Langstaff
Deborah Langstaff

Yours sincerely,

Drawing and Planning Ltd
Mercham House,
25-27 the Burroughs,
London,
NW4 4AR



Mr Liam Hart, Planning Officer
Development Division (west)
Dept. of the Built Environment
City of London Corporation,
PO BOX 270, Guildhall
London, EC2P 2EJ

Mr J Colombano and Ms M L Kirk
Lambert House
Flat 16, 2 Ludgate Square
London
EC4M 7AS

9th January 2018

Dear Mr Hart

**RE: Consultation on planning application 17/01207/FULMAJ at Creed Court 3-5 Ludgate Hill, 1-3
Creed Lane and 11-12 Ludgate Square, London, EC4M 7AA**

Thank you for consulting our client on the above application which I understand is a 'minor amendment' to the application referenced 14/00300/FULMAJ that was approved by the City's Planning Committee in 2017. Our firm has been instructed on behalf of Mr J Colombano and Ms M L Kirk to respond to the latest scheme. I have now had the chance to review the proposed plans and compare these to the approved set and have several concerns over the revised scheme as detailed below:

Windows

It is noted that across all levels, along the courtyard, the southern elevation window has been moved further east and another has been added; also along the eastern elevation the small hallway window has been removed and 3 no. extra windows have been added in its place. There is a concern that the extra windows would increase the sense/perception of overlooking into the neighbouring properties thereby diminishing the privacy and quality of amenity enjoyed by the existing properties. Whilst it is accepted that the windows will be obscure glazed there is likely to be issues with perception of overlooking and light spillage. This is not considered acceptable and it is strongly advised that an updated daylight/sunlight assessment is provided with the application.

Vents and Air Conditioning Units

There appear to be additional 'paraphernalia' incorporated into this scheme. It is noted that the internal courtyard will now be exposed to vents from the plant room at first floor level. This is likely to harm the neighbouring amenity through noise and disturbance and compromised air quality. The internal courtyard would also see the addition of a vent, which again raises concerns over potential noise and air quality issues that could affect neighbours. It has also been noted that vents have been installed opposite Flat 1, and adjacent to Flat 4, Lambert House. It is unclear as to the exact

location of the proposed air conditioning units - this information should be provided to affected neighbours, in addition, a noise impact assessment should accompany this application to establish the impact the units will have on neighbours.

Plant and Sub-station

It is noted that the sub-station has been relocated from the basement level to the ground floor in Ludgate Square, which would now sit adjacent to No. 2 and opposite Nos. 1-3 Ludgate Square which are all in residential use. This relocation is not considered acceptable without an updated acoustic assessment reflecting the change. It is also noted that at roof level, the plant now covers a larger area, specifically over the southwest perimeter of the courtyard surrounding Lambert House. Clearly the plant has been relocated to make space for more hotel rooms (intensification) at ground level (see below).

Intensification of Hotel Use and Additional Extensions

It is quite concerning to see that the applicant is seeking to cram more rooms into the hotel which would clearly affect the servicing of the hotel (new service plans need to be provided in our view). It would appear as though the new bedrooms at sixth floor level (replacing the plant area) are likely to overlook the properties (including ours) at 1-3 Ludgate Square. The approved scheme showed 7 bedrooms on the sixth floor whilst the current scheme is for 11 bedrooms at this level. Again, a revised impact assessment should be required from the applicant to ensure that there will categorically be no material harm to the amenity of the aforementioned properties.

Additional Works and Minor Amendments

We note that additional extensions to those approved are being proposed; the Section AA drawing indicates that on the sixth floor an extension is to be built. If this is the case we would argue firstly that such works would make the application 'invalid' as this would then add additional volume to the building putting the scheme, in our opinion, beyond the scope of a 'minor amendment' application and therefore this should trigger the need for a new full application. This point has also been raised by one of the other neighbours, Ms Nicola Bell of Flat 14, Lambert House, in her formal objection to the scheme via email dated 5th January 2018.

Notwithstanding this point, a daylight/sunlight assessment should be carried out and assessed by the Council's appointed assessors thereafter. We also seek clarification in respect of any increases in the parapet heights as we cannot see these in the proposed drawings.

Green Roof

It is noted on the roof plans, that the labelling of the 'Green Roof with Maintenance Access Only' as stated on the approved plans, has been replaced with simply 'Green Roof'. This is not considered acceptable as we would like assurances that the only access available to the green roof would be for maintenance purposes in perpetuity. Furthermore we note that that the Environmental Health Officer's (Gary Seal) consultation response in respect of the roof terrace stipulate limitation on hours of use which we are very alarmed to see. We fully expect that you confirm with the officer the agreement that the roof shall be only for maintenance purposes and for no other reason.

Conclusions

The new scheme as presented raises many issues which we feel really go beyond the scope of a 'minor amendment' application. If, however, the council wish to proceed with assessing this application as a 'minor amendment' we would like to see (a) justification of how this decision was reached to process as minor amendment under S.73 (b) all of the above issues highlighted, suitably addressed before affected neighbours are re-consulted. Needless to say, It has not been demonstrated that the scheme as presented thus far would comply with the City's local planning policies or indeed the wider London Plan and national planning policies.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself at [REDACTED] or our director, Jeremy Stein at [REDACTED]. We look forward to hearing from you and hope that you can support refusal of the latest application.

Yours Sincerely

[REDACTED]



Harman Sond | Principal Planning Consultant
BSc (Hons), MSc, MRTPI

[REDACTED]
www.drawingandplanning.com

Mercham House, 25-27 The Burroughs, Hendon, London, NW4 4AR.

From: Ken And Janice
To: [PLN - Comments](#)
Subject: Fwd: 17/01207/FULMAJ Objections
Date: 09 January 2018 22:19:48

, I agree with Matthew Rimmer's objections, assessments, and impact and fully support them as attached below.

Also I fully support Nicola Bell's objections in her letter of 5 January 2018.

Mrs J.L. Rimmer,

Flat 13 Lambert House, 2 Ludgate Square, London, EC4M 7AS

Subject: Fwd: 17/01207/FULMAJ Objections

Sent from my iPhone

Begin forwarded message:

From: Matthew Rimmer
Date: 31 December 2017 at 10:20:50 GMT
To: plncomments@cityoflondon.gov.uk, Liam Hart
<liam.hart@cityoflondon.gov.uk>
Subject: 17/01207/FULMAJ Objections

Liam

Please find below my objections to the proposed:

1. Concern around the increase in the number of windows in the internal courtyard. Even though windows are obscured they are still translucent and the potential for light spillage.

There is an expectation as with the original design that there be an IMPACT ASSESSMENTS on the internal courtyard particularly as windows are proposed to increase to 63 (plus skylights) increase is from 77.68sqm to 123sqm.

2. Within the internal courtyard a vent has been added. This is of particular concern due to air quality and noise issues.

Additionally a riser has been added with the vents being adjacent to Flat 4 Lambert House and opposite Flat 1 Lambert House.

A flue also has been added.

3. The location of a plant room on the first floor with vents onto the internal courtyard does not work from air quality and noise perspective. Directly opposite

and adjacent to residential neighbours.

4. Sub station has been moved from basement level to ground floor in Ludgate Square this is next to 2 Ludgate Square and opposite 1-3 Ludgate Square (all residential). We need a NOISE IMPACT STUDY as noise can transmit through the doors and building.

5. More clarity is needed on the air conditioning units and where they will be situated.

6. The plant that was previously on the 6th floor had been removed and been replaced by bedrooms. These bedrooms will directly overlook my neighbour and his terrace [at 1-3](#)Ludgate Square

7. The roof plan has been amended so the plant is now spread over the southwest perimeter of the courtyard surrounding Lambert House.

8. Concern on the Courtyard elevation AA on the 6th floor proposals show an extension to the build. We are daylight and sunlight sensitive so would request a NEW DAYLIGHT AND SUNLIGHT REPORT plus review by CoL employed daylight and sunlight experts too. If this is an error of the drawings they need to be amended so they are correct. A hedge is also noted on the proposals, this needs removing.

9. 3D image of the heights has not been included in the new proposal. It is essential this is provided.

10. "Increase in parapet heights to accommodate roof construction" the drawings are not consistent and do not show all proposed new heights. These need to be properly reflected.

11. Materiel impact on servicing due to the redesign and increase in bedrooms.

Please confirm receipt.

Many thanks

Matthew Rimmer

From: [PLN - Comments](#)
To: [PLN - Comments](#)
Subject: Comments for Planning Application 17/01207/FULMAJ
Date: 10 January 2018 15:03:53

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:02 PM on 10 Jan 2018 from Mr BRIAN LANGSTAFF.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square London EC4M 7AA

Proposal: Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 49 (approved drawings) of planning permission dated 06 October 2017 (ref: 14/00300/FULMAJ) to enable (i) removal of third basement level; (ii) internal reconfiguration to create 152 hotel rooms and associated alterations to the fenestration on Ludgate Square and Creed Lane; (iii) relocation of the UKPN sub-station from basement to ground floor level; (iv) reduction in A3 (restaurant) floor area from 1,028sq.m to 478sq.m and relocation of the restaurant entrance door to Creed Lane; (v) reconfiguration of the waste storage facilities and service area; and (vi) other minor internal and external alterations.

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mr BRIAN LANGSTAFF

Email:

Address: FLAT 5, LAMBERT HOUSE 2 LUDGATE SQUARE LONDON

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: We write to object to the amendments to the proposed design of the building, which make a number of changes we regard as significant.

Broadly, we endorse all that Matthew Rimmer said in his letter of objection.

We would wish however to emphasise some particular aspects. First, you will remember that the application only narrowly squeezed through to gain consent, notwithstanding the views of some of the senior lawyers who were on the

Committee that the proposals did not properly respect the City's policies. The principal objections were in respect of light, massing which amounted to over-development, intrusive noise, overlooking and "neighbourliness".

A particular feature of the revised plan is to increase the massing at level 6, so that instead of being tiered back in profile, from the "lip" of the light-well, an additional block of (presumably) rooms has been added. This is bound to affect light - it could not do otherwise.

We have had cause to draw attention previously to the partisan nature of GIA's comments regarding light. Sadly, the letter supporting the present application is no better: it recognises that bulk and massing are the critical factors (end of second paragraph), accepts they have increased at roof level (so that it is clear the relevant factors have altered) and appears to accept this again in the last paragraph. You might therefore think it to be inevitable that there would be some effect on light. GIA's reason for thinking that the light will not be affected is a non-sequitur: - "The changes currently proposed are aimed at the optimisation and functionality of internal layouts, thus the main bulk and heights of the massing remain the same" (emphasis added). In other words, the bulk and massing are altered, but because that's to increase internal space, it doesn't affect light. That's nonsense: what matters is the external not the internal layout. Since they accept there has been some change - and it cannot be to our advantage.

It is clear that given the already swingeing effects on light of the original proposal, and the lack of reliability of GIA's comments, a further analysis of light is needed.

Next, (a) it is not clear what acoustic (and vibration) protection there will be from the substation to be built right up against the flank wall of our properties: without this clarity, it must be assumed there is a real risk of noise/vibration. (b) The switching on and off of lights at all times of day and night in hotel rooms overlooking the courtyard causes further difficulties for the amenity of our properties, (c) the fact of such windows increases significantly the risk of overlooking and (d) additional mass has been added to an already heavily developed site. In short, each of the earlier objections, which so nearly carried the day before, now has added force by the new plans submitted, we note, by different architects.

The proposed amendments cannot be supported by the evidence thus far produced, and the application should be rejected: alternatively, deferred for further investigation, detail and consideration.

From: Y Oliver
To: [PLN - Comments](#)
Cc: [Hart, Liam](#)
Subject: Objections to Planning for 17/01207/FULMAJ
Date: 10 January 2018 15:15:53

Dear Mr. Hart,

RE :- Planning consultation (17/01207/FULMAJ)

We are writing to highlight the following concerns regarding the proposals to build a hotel next to our building, Lambert House in 2 Ludgate Square.

Firstly, we are concerned about the increased number of windows facing the internal courtyard. Our kitchen and main bathroom look into the courtyard. And how obscured would these windows be? It looks like the number of windows will almost double.

Secondly, the proposals call for the addition of vents, riser and flue to the internal courtyard and nearby my neighbouring flats below us. We are on the fourth floor. This will naturally lead us to worry about noises and the quality of air. We would like to be able to open our kitchen and bathroom windows especially during the summertime.

Previously, when the next-door building was occupied, we could hear outdoor conversations and smell cigarette smoke.

We are very concerned about the plant room to be located on the first floor of the hotel with vents facing the courtyard. Again, it doesn't bode well in terms of noise and air quality. Afterall, you will be placing a noisy industrial room next to a residential building.

Moving the plant room frees up the space for the hotel to add bedrooms with windows that will overlook my neighbours and their terrace.

Have you received further recommendations on how to reduce the probable noise problems by moving the substation from basement to ground level in Ludgate Square? What happens when there are power problems like explosions?

Any more information on where to place the air-conditioning units for the hotel?

We also can't find any 3D image of the heights of the hotel to compare with ours. We do worry about the daylight and sunlight impact. The new proposals seem to indicate the build will become bigger.

So, will this all affect the traffic and footfall into and around Ludgate Square? How will the hotel manage its suppliers and the public emergency services entering and exiting?

Looking forward to your reply.

Thank you,
Y. Tan (Ms.)

Flat 15 Lambert House,
2 Ludgate Square,
London EC4M 7AS

OBJECTION to Creed Court Planning Ref 17/01207/FULMAJ

The current revised application seems to contain many changes to that which was approved subject to various conditions and as such raises a number of relevant questions some of which are as follows: -

1. Concern over massing as elevations have changed and entry/exit points appear to be flexible.
2. The number of bedrooms has increased but is not fixed yet.
3. The electrical sub-station has been relocated adjacent to Lambert House and access could be via double or single door from Ludgate Square. There is of course another substation close by at the archway entrance to Ludgate Square. Will the sub-station be explosion proof and what if any will be the electromagnetic radiation levels?
4. Very strict conditions for noisy works were imposed under the formal approval and did not allow for any such work Saturday afternoons and all day Sundays. At the Contractor meeting of 12th June 2018 however, it was stated that Tower Crane provision and removal for the site would be on Saturdays and Sundays and would also involve partial or total closure of Ludgate Hill. The Jib and overfly of Lambert House is proposed to be restricted. Will the rear end of the jib with balance weights overfly in this very restricted area? But what of the loss of enjoyment of the roof top terrace of Lambert House. It would not be safe surely during crane operations? No mention of compensation for loss of amenity. This proposal needs careful diligent review as the works are within the St Pauls Conservation Area and are likely to create years of disruption.

The question of noisy work Saturday afternoons and Sundays seems to be the responsibility of The EHO and not the planning consents and conditions. How can this be? The CoL Code of Practice clause 3.5 clearly states NO NOISY WORKING IS PERMITTED SUNDAYS, BANK OR PUBLIC HOLIDAYS. Please advise who has the ultimate authority over such matters? Why the ambiguity?

5. The Contractor statement on noise levels shows a level of no more than 65db affecting local residents. Is this to the A weighting and why is the trigger limit set at 75db. Should this not be lower to prevent exceeding the limit?

6. The amount of disruption will be enormous to the immediate area and will cause more congestion of traffic in particular and of course the air pollution levels will rise from diverted traffic as is the case with Demonstrations, Cycle Rides /Races and other Events.

7. Will vibration monitors be attached to Lambert House above ground level and in addition to the substation?

8. Will the necessary Party Wall agreements/consents be applied for relating to Lambert House?

9. The proposed Taxi Drop Off and Waiting Area at the junction of Creed Lane and Ludgate Square will no doubt cause congestion and pollution in the local area which is at least a 3/4 way junction and includes a cycle path with reverse traffic flow.

10. What provision has been made for TV reception being impacted by the Crane work and the scaffolding? The building has a shared aerial for all flats, pixilation and poor reception has occurred when other builders were in the area. What are the Contractors going to do to avoid this disruption? Put a Satellite dish up for Lambert House or get a supplier such as Virgin media to be installed?

11. The Creed Lane and Ludgate Hill road junction proposed Saturday closures between 0800 and 1300 from July 7th – end of December 2018.

This is a busy junction what is being done about providing traffic Marshalls for safety for both pedestrians and cyclists? What investigation has taken place on the impact of pollution for this?

Yours sincerely

Nicola Bell

Flat 14 Lambert House, 2 Ludgate Square, EC4M 7AS



From: [DBE - PLN Support](#)
To: [Hart, Liam](#)
Subject: RE: Application Consultation (17/01207/FULMAJ) - objection email
Date: 03 July 2018 14:01:00

On 02/07/2018, 06:37, "Matthew Rimmer" wrote:

Liam

Please accept this email as my objection to Creed Court:

1. The UKPN sub station had been relocated to the ground floor, directly next to Lambert House, 2 Ludgate Square (residential) and opposite 1-3 Ludgate Square also residential. Also within the proposed design hotel bedrooms have been situated next to and above the sub station. I cannot think of a more inappropriate location and danger for residents.

2. The external alterations are quite major as the proposal is to continue convert the approved plant room into bedrooms and position the new plant room on top of that. This is going 2.4m higher than previously approved. The sense of enclosure will be heightened and this is a worrying. They propose a set back of 1m for the plant room and I suggest at a minimum a 3m set back from the internal courtyard to provide for the new plant room.

3. It needs to be very clear that even though basement -3 is no longer in scope the plans do not show any reduction in "height"
as the proposal is to have higher ceilings in basements -2 and -1 . So no change!

4. The increased number of windows of the proposed hotel in the internal courtyard rises from 77sqm to 123sqm. Even though windows are proposed to be obscured they are still translucent and the potential for light spillage.

Info:

Consented section AA goes from 5 windows to proposed 16 windows.

Consented section BB goes from 14 windows to proposed 32 windows

5. I see NO indication that the windows facing the internal courtyard will be non opening and fixed closed they reference "aluminium sliding sash windows". Please URGENTLY look at this, this is very important to residents that they are fixed closed and non opening per the approved scheme.

6. The Combined Heat and Power (CHP) System with the proposed room increase revises the anticipated size from 20kWt and 3000 thermal store to 30kWt with 4000 thermal store. All detrimental to us residents.

7. It is noted that to new build facades will be ventilated via Louvres that sit at the top of each window. Rooms that sit behind The retained portion of the facade fronting Ludgate Hill and the north of Creed Court will be vented centrally and therefore these windows will not have Louvre panels. I suggested the windows facing the internal courtyard are also vented centrally to mitigate further disturbances to residents.

8. I cannot understand why all noise and air quality potential issues have been situated next to Lambert House, 2 Ludgate Square. Within the internal courtyard vents , flues, riser, plant room have been added. All to the detriment of residents.

Regards
Matthew Rimmer

Sent from my iPhone

Mr Liam Hart, Planning Officer
Development Division (west)
Dept. of the Built Environment
City of London Corporation,
PO BOX 270, Guildhall
London, EC2P 2EJ

Mr J Colombano and Ms M L Kirk
Lambert House
Flat 16, 2 Ludgate Square
London
EC4M 7AS

Tuesday, 3rd of July, 2018

Dear Mr Hart,

**RE: Consultation on planning application 17/01207/FULMAJ at Creed Court 3-5 Ludgate Hill, 1-3
Creed Lane and 11-12 Ludgate Square, London, EC4M 7AA**

Thank you for consulting us on the above application which I understand is a 'minor amendment' to the application referenced 17/01207/FULMAJ that was approved by the City's Planning Committee in 2017. I have now had the chance to review the proposed plans and compare these to the approved set and have several concerns over the revised scheme as detailed below:

Our main concern is the proposed extra level of 2.4m to be added on top of the approved scheme. We have no problem with the proposal to turn the the approved plant-room into extra hotel bedrooms. The problem is the impact the new proposed plant room will cause the existing residents and especially myself and my wife. Please find attached a photo of my view that will be severely affected by the proposed plant-room. We have attached an alternative proposed sketch (we propose 2 plant areas and lift core only, which is proposed in red on the attached sketch), this is a solution that would be acceptable to us and protect our impact from the latest proposal. This proposal will cause us:

- a. Increased sense of enclosure to the already packed and tight courtyard.
- b. Daylight / Natural lighting impact by adding excessive plant and screening to the roof.
- c. Over-Provision of proposed plant, the proposed space is excessive and we feel the plant required will fit comfortably in our proposed two red areas on the sketch attached. We formally request a schedule of the proposed plant so we can confirm our expectations.

Following on, we would like to raise our concerns and non objection's in the order mentioned in the planning application description:

- (i) removal of third basement level -

We note that the two basement levels is of the same depth as the three levels approved. - We do not object to this item but hope that the basement will be conditioned to protect Lambert House during the building works.

(ii) internal reconfiguration to create 152 hotel rooms and associated alterations to the fenestration on Ludgate Square and Creed Lane;

We do not object to the 12 extra bedrooms or the external changes as long as the extra windows proposed to the courtyard light-well are opaque and non openable as confirmed in your email to Matthew Rimmer "All courtyard windows will be fixed with obscured glazing".

(iii) relocation of the UKPN substation from basement to ground floor level;

We do not object to this item, however I do struggle to understand how it is safe to place bedrooms directly next to or on top of a UKPN sub-station?

(iv) reduction in A3 (restaurant) floor area from 1,028sq.m to 478sq.m and relocation of the restaurant entrance door to Creed Lane;

We do not object to this item to the reduction or relocation of the entrance. However we would ask that the restaurant is conditioned to close at 23:30 Monday to Sunday in order to avoid members of the public congregating and making noise on the nearby streets at unsociable hours.

(v) reconfiguration of the waste storage facilities and service area;

We do not object to this item however we would request there is a condition put in place to make sure the waste storage area is regularly cleaned once it is finally in use.

(vi) other minor internal and external alterations -

We object to this point which is detailed above and we welcome the proposed roof plant room redesign in line with the proposal attached.

We also await the schedule of proposed plant?

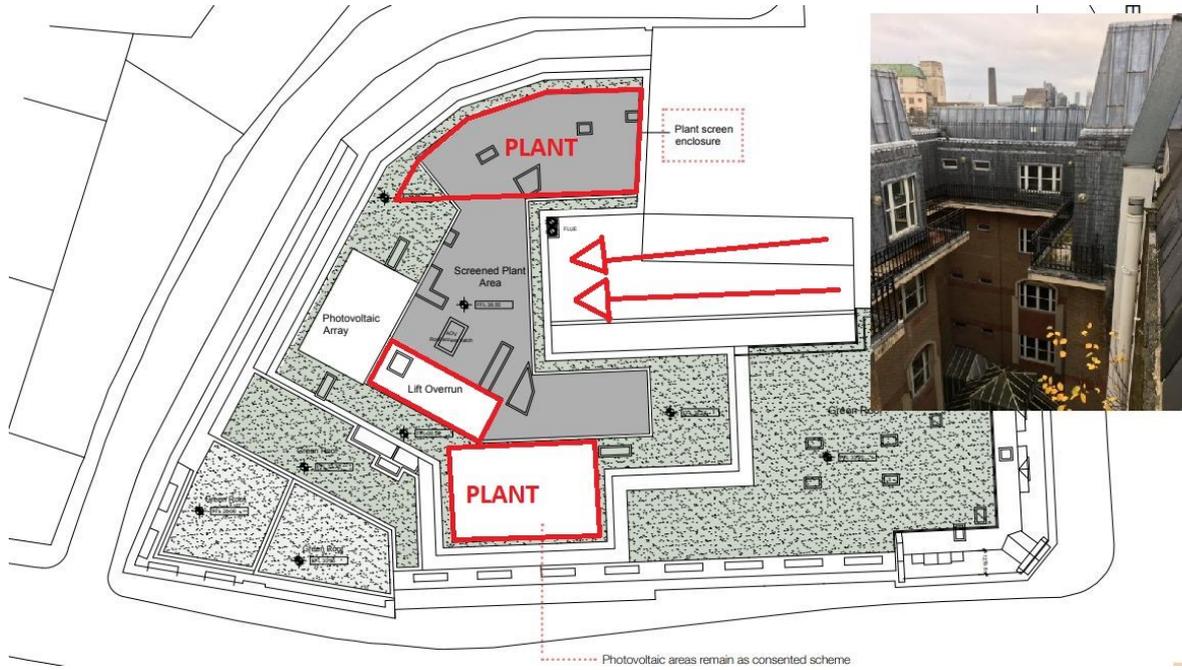
Liam, finally, we understand that the courtyard will be for maintenance only with no access from the public, we request that this is added to every plan, similarly, we also request that the labelling Green Roof For Maintenance Access Only remains and is added to every plan showing the roof space. We also request that both the courtyard and green roof restrictions will be conditioned on any approval issued.

I trust the above is clear, however, should you require further clarification please do not hesitate to contact either myself or my wife, Marie Louise by email at the following address [REDACTED] I look forward to hearing from you and hope that you can support refusal of the application.

Yours Sincerely

Mr J Colombano and Ms M L Kirk
(Owners of Flat 16, Lambert House)

Attachments



Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Formal objection - Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (ref:17/01207/FULMAJ)

From:
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; Hart, Liam <Liam.Hart@cityoflondon.gov.uk>
Subject: Formal objection - Creed Court 3-5 Ludgate Hill, 1-3 Creed Lane and 11-12 Ludgate Square, London EC4M 7AA (ref:17/01207/FULMAJ)

Dear Mr Hart

I am writing to register objections to the amendments to the planning application for Creed Court 3-5 Ludgate Hill, 1–3 Creed Lane and 11–12 Ludgate Square, London EC4M 7AA (17/01207/FULMAJ).

I have objections to the following proposed changes.

1. Relocation of the sub-station to ground level

The sub-station will be moved to the ground floor level next to 2 Ludgate Square and opposite 1-3 Ludgate Square. These are residential buildings and, being on the ground floor, the noise can transmit through the doors and building which will adversely impact the residents.

2. Introduction of vents within the internal courtyard

There is an increase in the number of vents onto the internal courtyard. A riser has been added with the vents being directly opposite to my flat which will be adversely impacted by noise and air quality issues.

3. An increase in the number of windows in the internal courtyard

Over 60 new windows are proposed in the internal courtyard. This represents a 58% increase in the area of windows in the internal courtyard (from 78m² to 123m²). This is an unreasonable increase in the number of windows which will impact the loss of privacy. In addition, conditions must be imposed that require those windows overlooking the internal courtyard must be fixed and fitted with opaque glazing.

4. Changes to the 6th floor

The courtyard elevation on the 6th floor proposals appear to show an extension to the building. This is an increase in the proposed height of 2.4 metres which will result in a further loss of daylight and sunlight and privacy.

5. Increased requirement for servicing and traffic

The proposed increase in rooms will result in an increase in the number of hotel guests with a resultant increase in the requirement for servicing, deliveries and traffic. Ludgate Square and Creed Lane are narrow lanes which are not capable of supporting the increased traffic volumes.

Yours sincerely,

Michael Tang

Flat 1, Lambert House, 2 Ludgate Square, London, EC4M 7AS.

From: PlnComments@cityoflondon.gov.uk
To: [PLN - Comments](#)
Subject: Comments for Planning Application 17/01207/FULMAJ
Date: 05 July 2018 17:12:35

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 5:06 PM on 05 Jul 2018 from Mrs JANICE RIMMER.

Application Summary

Address: Creed Court 3 - 5 Ludgate Hill, 1 - 3 Creed Lane And 11 - 12 Ludgate Square London EC4M 7AA

Proposal: Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 49 (approved drawings) of planning permission dated 06 October 2017 (ref: 14/00300/FULMAJ) to enable (i) removal of third basement level; (ii) internal reconfiguration to create 152 hotel rooms and associated alterations to the fenestration on Ludgate Square and Creed Lane; (iii) relocation of the UKPN sub-station from basement to ground floor level; (iv) reduction in A3 (restaurant) floor area from 1,028sq.m to 478sq.m and relocation of the restaurant entrance door to Creed Lane; (v) reconfiguration of the waste storage facilities and service area; and (vi) other minor internal and external alterations (RECONSULTATION: DESIGN CHANGES AND SUBMISSION OF: DAYLIGHT AND SUNLIGHT REPORT, LIGHT SPILLAGE REPORT AND UKPN NOISE DATA).

Case Officer: Liam Hart

[Click for further information](#)

Customer Details

Name: Mrs JANICE RIMMER

Email:

Address: Flat 13 Lambert House 2 Ludgate Square London

Comments Details

Committer Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Noise
- Residential Amenity
- Traffic or Highways

Comments: City of London Planning
FAQ Liam Hart 6th July 2018

Objection to Creed Court Planning Ref 17/01207/FULMAJ

In the Internal Light-Well,
Flues - rooftop extraction, what about downdrafts from the

wind blowing back into our property. Please check this out, otherwise it will cause loss of air quality.

Doors - How many? Even with the larger current Light-Well voices are very intrusive and will be more so on a reduced Light-Well.

It is stated that "Noise levels will exceed limits but not affect the Hotel." Why should noise level limits be allowed to be exceeded? This will certainly be detrimental to residents of Lambert House.

The proposed hotel elevation on Ludgate Square has an emergency door, maintenance door housing UKPN Sub Station - LV Switch Room. However these are too close to Lambert House's only exit. Plus all other residents evacuating from across and further down the narrow lane. How many people will be coming out of this area in an emergency?

Could the emergency services operate efficiently in this confined space with so many people.

The CHP space has no details why? It is most essential to know. How can you pass this Plan without knowledge of this especially for the residents of Lambert House.

Please notify us when you know.

yours sincerely,

J.L. Rimmer (Mrs)
Flat 13 Lambert House, 2 Ludgate Square, EC4M 7AS.



Flat 5, Lambert House
2. Ludgate Square
LONDON EC4M 7AS
6th. July 2018

Department of the Built Environment,
City of London,
PO Box 270,
Guildhall,
LONDON EC2P 3EJ

fao Liam Hart

Dear Sirs

14/00300/FULMAJ

We write to object to the proposed redesign of this consented development.

There is a real danger, from which we look to our elected representatives to protect us, of “planning creep” – it may be easier for a limited scheme to obtain consent, and then to alter it to incorporate features which would not have been acceptable in the original application, and would have led to its refusal. In particular, where the original has only just crept through by only two or three votes of the original committee, the Council should be on its guard. That is the case here – the critical features which almost persuaded the Council to refuse permission were the effect of the development on light, the massing which amounted to over-development, intrusive noise, overlooking and lack of “neighbourliness”.

We repeat what we said in our letter of January this year.

As to **light**, there is now a lengthier report from GIA, which sadly adds little to its earlier letter. The plain fact is that the revised proposal is for a significantly higher building, which is not stepped back from the perimeter of the interior light well sufficiently to avoid interfering with light. It is not disputed that our flat will suffer further loss of light. The only attempt to justify this is that in urban areas, light levels are often and inevitably reduced – and thus (it seems to be said) a further reduction does not really matter. This simply does not follow in logic: it amounts to saying that because we have too little light, we can more easily suffer the loss of some of the little we have than someone who starts with more. The true analysis is that light has value to all residential occupants: but it is of greater importance to preserve what little some have, the less they have. Any comparison should be not between the original and revised schemes, but between the revised scheme and the pre-consent condition of the building. On such a comparison, here, the objection as to reduced light would have become even more powerful.

We complained earlier of over-development: the revised plans amount to further development. This is obvious by the packing in of additional bedrooms, and the increase in height.

As to intrusive noise (and light) and overlooking: there are now to be several bedrooms which have a window into the courtyard into which our bedrooms at 2 Ludgate Square face. If they are to have louvres, as seems to be proposed, then noise and light are more likely to escape. There is no assurance in the plans that the casements will not open (as we were assured by the developer before). Instead of opaque windows giving onto staircases in the main in the proposed building,

these windows give light to – but also emit light from – bedrooms. The switching on and off of lights at night is likely to affect our amenity. The original plan is to be preferred; if not, then certainly a condition that the casements are fixed shut must be imposed.

We repeat, from our earlier letter: (a) it is not clear what acoustic (and vibration) protection there will be from the substation to be built right up against the flank wall of our properties: without this clarity, it must be assumed there is there is a real risk of noise/vibration. (b) The switching on and off of lights at all times of day and night in hotel rooms overlooking the courtyard causes further difficulties for the amenity of our properties, (c) the fact of such windows increases significantly the risk of overlooking and (d) additional mass has been added to an already heavily developed site.

In short, each of the earlier objections, which so nearly carried the day before, now has added force. The dangers of the “creep” to which we referred above are all too clear. The new plans would have been more likely to have been rejected altogether beforehand. The proposed amendments cannot be supported by the evidence thus far produced, and the application for this revised scheme should be rejected

Yours,

Sir Brian and Lady Langstaff.