

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Nils Fischer

Address: 88 John Trundle Court, Barbican, London EC2Y 8NE

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed development drastically exceeds the height of the existing structures - by in excess of 10 metres and 3 floors. This will notably impact the view from my east facing property on the 4th floor of 88 John Trundle Court.

The additional height will fully feature as a reduction in visible sky from my property, and eliminate views to landmarks such as the London Eye.

Further, the north facing windows of the new, top three floors of the proposed development will be exposed to my living room and vice-versa. This applies to all east facing flats on the 4th-6th floor of John Trundle Court.

As a side note, the elevations forming part of the Application appear to systematically omit heights on elevations, sections and plans which suggests that there may be an intent to consciously distract from the fact that it represents a significant increase over both the existing buildings and the context in Long Lane. These heights are key information for an assessment and comparison of the proposal; the only document containing heights would appear to be the daylight study. This should not be tolerated.

I strongly suggest to keep the building height in line with the existing structures on site to mitigate any adverse impact on neighbours; the proposal is significantly higher than any of the surrounding buildings and sets a precedent for further vertical densification directly adjacent to the city's biggest residential development.

From: Chairman
Sent: Tuesday, February 13, 2024 3:40 PM
To: PLN - Comments
Subject: 23/01417/FULMAJ, 1-8 Long Lane, EC1A 9HF

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I am writing as Chairman of the Smithfield Market Tenants' Association which represents the interests of the meat traders at Smithfield Market. I am also an elected member for the ward of Farringdon Without.

I note that the SMTA is not listed as a consultee on this matter. You should not assume that the interests of the Markets Department at the CoL and the SMTA are totally aligned.

My comments refer in particular to the Outline Construction Logistics Plan.

It is interesting that this plan barely mentions the Market except as a local amenity/attraction in 2.11 (page 6) again on page 9, and as a place of interest in figure 2.4 on page 14.

We don't rate a mention in 2.40 – Local Commercial and Residential Properties.

It is to be hoped that Market operations have been factored into the logistics plan?

Point 4.5 - Vehicular routes – the arrival route is deceptively simplified – it in fact entails Farringdon Street, West Smithfield, East Poultry Avenue, Charterhouse Street, Lindsey Street and then Long Lane, due to the one-way system. This takes all the construction traffic most of the way around the Market. If the construction traffic hours are strictly observed, which in our experience they generally are not, ie no construction traffic before 8am or after 6pm Monday to Friday, then there should not be a problem. We do not wish to see construction traffic queuing back into the Market before 8am and preferably not even then.

It should be noted that Long Lane is a major route into and out of the Market and it is important that unimpeded two-way traffic is maintained at all times when the Market is operating. Furthermore, in the run-up to Christmas, the single yellow line on the north side is replaced by double yellow lines to prevent inappropriate stopping and to ensure that Market traffic flows smoothly.

You will understand, therefore, our concerns regarding any on street loading/unloading areas or the suggestion of any road closures. Points 3.5 and 4.1 are of particular concern and we would like reassurance that none of the restrictions mentioned will impact on Market trading hours. You will be aware, no doubt, that traffic flow during the day eastbound through the traffic lights at Aldersgate Street is not quick and I would be interested to know what measures are envisaged

to redirect this flow – I trust that they will only be present during the day.

Finally, I would like to raise the matter of dust and I trust that appropriate testing and mitigation measures will be in place to ensure that our products are not contaminated.

Kind regards

Greg Lawrence
Chairman
Smithfield Market Tenants' Association
Management Offices Suite B
East Market Building
London Central Markets
London EC1A 9PQ

Peter Golob
42 Charterhouse Square
London EC1M 6EA
21st February, 2024

E | [REDACTED]
M | [REDACTED]

For the attention of:

Anna Tastsoglou Planning Officer

Thomas Roberts MRTPI | Planning Officer (Design)

Urban Design & Conservation | Planning Division | Environment Department

City of London Corporation | Guildhall | London EC2V 7HH

Comment on **Daylight and Sunlight Assessment** in relation to
23/01417/FULMAJ | Demolition of existing buildings to basement level and construction of a
nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b))
use at part ground and basement levels together with ancillary cycle parking, associated
servicing, plant, amenity terraces, landscaping and other associated works. | 1-8 Long Lane
London EC1A 9HF

Dear Anna and Thomas -

I have had the opportunity to read through some of the 136 documents uploaded to date in
connection with the above application.

This comment confines itself to concerns with regard to the 3 part Daylight & Sunlight
Assessment prepared by Point 2 and dated 19th December, 2023.

I am clearly not an expert in this area but trust that Point 2 would not mis-represent the BRE
guidelines per the discussion of same in section 4 of the report so make my observations with
this condensed version of the guidelines as a reference.

Observations

- 1) **Selective Data:** Point 2 does not apply the criteria consistently in the body of the report
with respect to the windows of Flat 6, or other flats, even though their data is contained
in the annexes. Sometimes we have a figure for VSC with “balcony”; sometimes without;
sometimes a fixed VSC and sometimes a “reduction in the VSC”; sometimes an APSH,
mostly not and similarly casual approach with regard to the BRE Guidelines (sometimes
relevant sometimes not in the opinion of Point 2).

The appendix to the report and conclusions, is rather more consistent and paints a very
consistently negative picture for my property. Of the five windows identified by the
authors of the report, **none** would meet the minimum BRE standard of 27% as a result of
the proposed development. One would suffer a reduction in VSC of ~50%, one a
reduction of ~30% and two a reduction of ~20%, meaning that 4 do not pass the third
BRE Daylight test. (see table 1 below).

- 2) **Misrepresentation 1:** The report states the authors have had access to my flat. (7.52 *We have had access into this flat and it is dual aspect with windows also facing onto Charterhouse Square.*). As the owner of the flat this statement surprises me since I have not provided access to the authors or given permission for them to have access. Secondly, if the authors of the report had obtained access they would be aware that the flat on 3rd floor 42 Charterhouse Square is joined to the flat on 3rd floor 43 Charterhouse Square, and has been since 2000. However, the authors state that they have not had access to the flat on 3rd floor 43 Charterhouse Square (7.72 *We have not had access into this flat, but we have found a floor plan within the lease held by the land registry which is given below.*).
- 3) **Misrepresentation 2:** The authors of the report present floorplans for Flat 6 which are inaccurate, both at the date of the report and per planned alterations. This means that rooms identified as “bedrooms” or “hallway” are in fact neither but form parts of the main living space and are which calls into question their conclusions (7.59 *Overall, there are only bedrooms being affected to this flat which, as set out in the BRE guidelines, are considered less important.*)
- 4) **Misrepresentation 3 and Missing Analysis:** The authors of the report make many convenient adjustments to the estimated VSC to allow for the presence of “balconies”. In fact there are no balconies on the south face of 41-43 Charterhouse Square. There are fire escapes which differ greatly from balconies in that they are shallow (<1m wide) have galvanised railings and galvanised grating rather than solid floors and solid upstands like a balcony. Point 2 does not disclose the methodology deployed to obtain the different VSC impact between the various windows and the various windows “without balcony” but it is apparent that the analysis significantly overstates the impact of the “balconies” on the VSC. The analysis “without balconies” should be ignored. I strongly believe that a physical inspection of these “balconies” will demonstrate the point that they do not screen the sky any more than a tree in winter.
- 5) **Impacts from Proposed Development compared to the Consented Scheme:** It is not clear what methodologies the authors of the report have deployed to arrive at their conclusions in this section (Section 8), and the report is confusing as to the base line. The authors seem to imply that the overall impact of the proposed scheme is less than that of the consented scheme but only because the proposed scheme does not entail raising the heights of the buildings 9-12 Long Lane to unacceptable levels. Given that plans in relation to 9-12 Long Lane are yet to be presented it seems odd to present this as an argument at all.

Nevertheless, the authors feel able to conclude that (8.7) *The 11 windows that no longer meet the BRE guidelines in this scenario are located within 39-40 Charterhouse Sq (5 windows), 43 Charterhouse Square (3 windows) and Carthusian Court (3 windows).* With respect to the 3 windows within 43 Charterhouse Square, the report states (8.8) *The 3 windows within 43 Charterhouse Square are part of a large Living/Kitchen/Dining room and there are a further 5 windows serving this space that meet the BRE guidelines. The fact that 3 of the windows are now just beyond the BRE guidelines is therefore not material as the average of the percentage reductions are still below 20% and the retained VSC value above 25%.*

There is no offer of any analysis as to how these figures are reached, what the baseline is or how it is estimated. It is also worth noting that in this analysis, 43 Charterhouse Square is treated as a single integral property whereas the previous analysis (Section 7) was more accurate in identifying several separate flats which would be individually very severely affected without any mitigation from access to windows which lie within separate properties. It seems that the authors have unwittingly provided substantiation of the extreme loss of light amenity caused by the proposed development, but not identified the properties which are expected to suffer.

It is worth noting that in the January, 2019 addendum to the original 2018 Daylight and Sunlight Report (since deleted and replaced by a report issued in July, 2020) the same authors (Point 2) note with respect to 41-43 Charterhouse Square: 5.4 *The VSC and NSL test results show that all rooms are likely to experience reductions which are beyond the BRE guidelines. When looking at the windows most likely to be impacted, and with the fire escape balconies in place, the percentage reductions range from 30-65%* [my emphasis].

The critical point here is that the applicants apparently have consent to increase the height of 9-12 Long Lane and any development which will be massively detrimental to the Daylight & Sunshine available to all properties to north of the proposed development. As table 1 below shows, the impact of the proposed scheme is already significantly negative compared to the consented scheme, so it follows that any development whatsoever of 9-12 Long Lane will increase the impact. Do the developers offer to ensure no application will ever be made to increase the height of 9-12 Long Lane despite the consented plan of 2021? If not then we simply have a case of dividing up one site as many times as is required to ensure that each impact considered individually can be presented as tolerable in relation reinterpreted BRE Guidelines. This is simply dishonest.

As the owner of Flat 6, I am clearly very familiar with the flat in question and can detect evident inaccuracies, misrepresentations, questionable data and inconsistencies. It concerns me that other owners throughout the affected area might be in a similar position but not have the time to comb through the report in detail to detect multiple additional inaccuracies, misrepresentations, questionable data and inconsistencies. I do not regard it as credible that my flat has been singled out for same and therefore presume that inaccuracies, misrepresentations, questionable data and inconsistencies are endemic to the report which should give recipients of the report great cause for concern.

To be fair to the authors, I strongly suspect that many of these faults are due to a “copy and paste approach” based on the report compiled for the previous planning application from July, 2020. This is evidenced by whole paragraphs being extracted from the prior report *verbatim*. However, I think it compounds misrepresentation to attribute validity as of December 2023, to misrepresentations which originally date from 2020 or even 2018. Point 2’s Methodology was criticised as “dubious” on every occasion when reviewed by the independent consultants BRE in the context of the 2018 and there is little evidence that this firm has responded constructively to the criticism.

Even though the report takes unprofessional liberties to present a positive spin on the Daylight and Sunlight impact of the proposed development it is clear that this development would lead

to severe loss of light for my property and in the nature of it, for all the properties to the north of the proposed development site. The more detailed sunlight loss analysis presented in the Appendices to the main report makes this clear, with all windows suffering a winter loss of 46-100%, to name one figure (Appendix 7: Sunlight Analysis p.8). In plain English the loss of Daylight and Sunlight from the proposed scheme is more significant than in the previously approved scheme even on Point 2's own data because the height and massing of the building is so significant compared to the extended mass and height of the previously approved scheme (see annex 1).

The consented plan was "seven floors" (not including the ground floor, so 8 floors in total) while the proposed plan is for "nine floors" (not including the ground floor, or the extensive plant on the roof which suggests it is rising to 10 floors maximum in total, though raked back towards the centre from floor 9) rising to an unacceptable height which is far too high for the neighbourhood. I believe that City of London Planning should restrict the height of any development to ensure it is in keeping with Griffen Court and 135-137 Aldersgate Street, which are already somewhat higher than the highest levels of Carthusian Court.

In this comment I only have regard to the daylight loss to a flat on the upper floors of 42/43 Charterhouse Square. Other properties at lower levels on the northern side of the proposed development will suffer much more significant impact. It is simply not equitable to deprive existing residents of a valuable and necessary amenity for the sake of the commercial gain of a development without extending any compensating benefits to those existing residents.

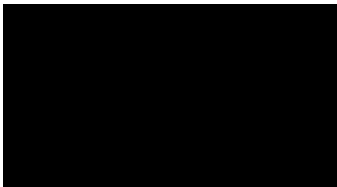
In the course of examining the prior application for development of this site 18/1020, the methodology of the same Daylight and Sunlight Consultants was called into question and independent assessment of their work was sought on four occasions. The issue with these independent reports is that they reviewed and criticised the work of Point 2, occasionally in very strong terms, but did not conduct a re-examination of the basic findings and took Point 2 factual statements as being, well, factual. My analysis suggests that even factual statements from Point 2 should be re-examined independently and therefore I believe CoL planning should commission a fully independent Daylight and Sunlight Assessment for all affected properties. Put another way, I have little confidence that the base data is accurate or unbiased.

Finally, I think a photo from directly behind one window at 42 Charterhouse Square (R2/W30/403 in the Point 2 numbering system) adjusted to show the impact of the proposed scheme (as best as I am able to estimate same) goes a long way to demonstrating the significant impact on Daylight and Sunlight available to this room where dry numbers do not. Incidentally, the photograph also shows that the "balconies" are as noted, formed of grating with galvanised railings which do not significantly impede daylight or sunshine.



R2/W30/403 2024.02.16

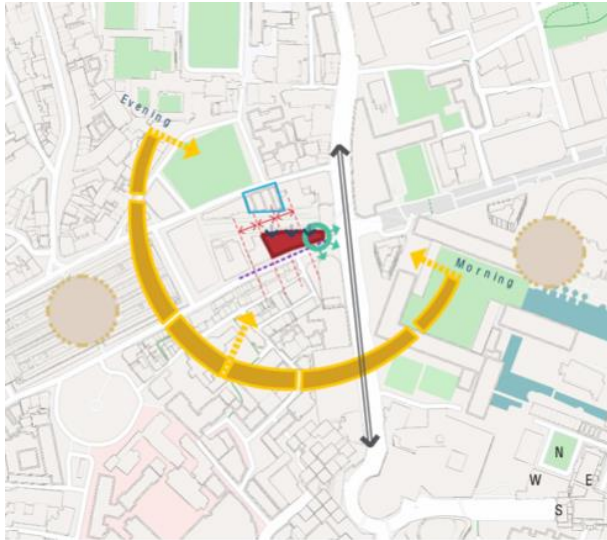
Yours Sincerely –



Peter Golob

Table 1

The below data shows that in most cases all the daylight and sunlight loss of the previously analysed scheme is taken by the current proposed scheme even though there is no allowance for the development of 9-12 Long Lane which would block considerable amounts of light in its own right. This is demonstrated by the below diagram from the Design & Access Assessment submitted in conjunction with **23/01417/FULMAJ** (section 2.8, p.20) (41-43 Charterhouse Square Highlighted in [light blue](#)). This shows that late morning and early afternoon sun strikes 31-43 Charterhouse Square though the footprint 9-12 Long Lane, emphasising the impact of the height and massing under proposal 23/01417, which alone causes as much impact as when 1-12 Long Lane were going to be developed to nearly the same height under 18/01020.



1-8 Long Lane Comparison of Daylight Impact of 18-01020-FULMAJ vs. 23-01417-FULMAJ on Flat 6 42 Charterhouse Square

Point 2 Ref		2020.07			2023.12			2020.07			2023.12		
Room	Window	Existing VSC		Delta	Proposed VSC		Delta	Loss		Delta	% Loss		Delta
R1 403	W1 403	7.08	7.08	0.00	5.07	5.07	0.00	2.01	2.01	0.00	28.4%	28.4%	0.0%
R2 403	W2 403	2.82	2.82	0.00	2.75	2.73	-0.02	0.07	0.09	0.02	2.5%	3.2%	0.7%
R2 403	W30 403	31.27	31.27	0.00	24.63	24.67	0.04	6.64	6.60	-0.04	21.2%	21.1%	-0.1%
R3 403	W29 403	31.48	31.49	0.01	24.78	25.23	0.45	6.70	6.26	-0.44	21.3%	19.9%	-1.4%
R1 18	W1 18	12.24	12.24	0.00	7.31	6.42	-0.89	4.93	5.82	0.89	40.3%	47.5%	7.3%

NSL		2020.07			2023.12			2020.07			2023.12		
Room	Window	Existing Sq. ft		Delta	Proposed Sq. ft		Delta	Loss		Delta	% Loss		Delta
R1 403	W1 403	96.5	96.5	0.0	96.5	96.5	0.0	0	0	0.0	0%	0%	0%
R2 403	W2 403	197.2	197.2	0.0	124.1	126.2	2.1	73.1	71	-2.1	37%	36%	-1%
R3 403	W29 403	86.0	86.0	0.0	86.0	86.0	0.0	0	0	0.0	0%	0%	0%
R1 18	W1 18	180.4	180.4	0.0	170.9	174.8	3.9	9.5	5.6	-3.9	5%	3%	-2%

ASHP		2020.07			2023.12			2020.07			2023.12		
Room	Window	Existing Winter		Delta	Existing Annual		Delta	Proposed Winter		Delta	Proposed Annual		Delta
R1 403	W1 403	4	4	0.0	19	19	0.0	0	0	0.0	15	15	0.0
R2 403	W2 403	1	1	0.0	3	3	0.0	1	1	0.0	3	3	0.0
R2 403	W30 403	23	23	0.0	74	74	0.0	12	11	-1.0	63	62	-1.0
R3 403	W29 403	22	22	0.0	74	74	0.0	13	12	-1.0	65	64	-1.0
R1 18	W1 18	15	15	0.0	36	36	0.0	6	2	-4.0	27	23	-4.0

ASHP		2020.07			2023.12			2020.07			2023.12		
Room	Window	Proposed Winter Loss		Delta	Proposed Annual Loss		Delta	Proposed Winter Loss %		Delta	Proposed Annual Loss %		Delta
R1 403	W1 403	-4	-4	0.0	-4	-4	0.0	-100%	-100%	0%	-21%	-21%	0%
R2 403	W2 403	0	0	0.0	0	0	0.0	0%	0%	0%	0%	0%	0%
R2 403	W30 403	-11	-12	-1.0	-11	-12	-1.0	-48%	-52%	-4%	-15%	-16%	-1%
R3 403	W29 403	-9	-10	-1.0	-9	-10	-1.0	-41%	-45%	-5%	-12%	-14%	-1%
R1 18	W1 18	-9	-13	-4.0	-9	-13	-4.0	-60%	-87%	-27%	-25%	-36%	-11%

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Alberto Garciga

Address: FLAT 151 LAUDERDALE TOWER, BARBICAN, LONDON London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Traffic or Highways

Comment: I object to this planning application due to the potential impact on traffic, pedestrian, cyclists and neighbours of this property. Vehicle traffic can potential increase in what is already a very narrow yet busy street with HGVs entering and exiting Smithfield Market six days a week. There would be impact to the cycle lane as taxis and other forms of transport stop to allow potential hotel guests to disembark and embark vehicles. This may cause a danger to cyclists as they have to veer into traffic. There is also a lack of access for vehicles that would be required to support the hotel operation.

I further object on the additional floor that would be required for the ventilation equipment, lift shafts and additional lift to upper floor to evacuate guests in case of an incident.

I also object to potential noise to neighbours and in particular those in Lauderdale Tower from events that could be held on terraces and balconies.

This is no location for a hotel as road is too narrow and traffic impact studies have not been adequately done.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Dr Mary Chard

Address: 171 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment:1 Long Lane is too narrow to sustain the additional traffic created by a busy hotel

2 there is a notable lack of rear access to any proposed hotel to allow movement of lorries servicing hotel

3 Proposed height and volume of building is substantially higher than existing building and disproportionate to the neighbouring buildings

4 The plans have failed to describe the inevitable additional floor(s) for plant and equipment

5 Balconies and terraces are likely to generate noise thus impacting on nearby residents

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mrs Lesley Steward

Address: 132 Lauderdale Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Traffic congestion. Difficulty for goods vehicles servicing Smithfield. Road too narrow to accommodate extra traffic. Noise. Hazardous for cyclists.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mrs A Resident

Address: Lauderdale Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I live in Lauderdale Tower. I object to the addition of any terraces for events as it would significantly increase noise for Lauderdale residents. We already get a lot of traffic noise, and noise from the street which carries upwards with no obstacles to stop or dampen the noise. Adding terraces or much more foot traffic in the area would significantly impact on quality of life and sleep for me and my children.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Dr Clare Wood

Address: Flat 301, Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: Our apartment looks directly down on this site.

I object on the following bases:

1. We already have to deal with regular traffic jams from Smithfield to the Aldersgate traffic lights. Car / lorry horns sound out on a regular basis. The road is very narrow with small cycle lanes on either side. I cannot conceive how the road could cope with the traffic that a hotel would create. There will be no goods entrance at the back so everything will need to come off the road. Taxi's picking up and dropping guests etc. There will be more noise / traffic jams / disruption in an already deeply congested area.
2. Smithfield market creates an large amount of heavy goods traffic most of which is at night however it starts in the early evening and can go through to late morning. This will add to the issues stated above.
3. The cycle lanes may become unsafe due to the additional traffic and the crossing of the cycle lane to provide access to the hotel.
4. The proposed height is twice the current size (or more when adding the roof services). It is not in keeping with the neighbourhood or the ability of the road to provide access to so many people.
5. To permit a change of use from offices to a hotel with balconies and terraces on which outdoor activities will be held when you have residences so close beside the property is a deep and very serious concern. The Barbican is a listed estate. We are not permitted to put in triple glazing and in any event the heating means that windows are often left open.

I object to this proposed development.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Ms Judith Brown

Address: 243 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Though I am in favour in principle of the proposal to replace the existing office building with a boutique hotel, I object to the height of the proposed building which is out of scale with the surrounding buildings and local streetscape, and inappropriate for this site.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Ann George

Address: 173 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: This is an absurd place to site a busy hotel. Street too narrow. Traffic congestion in an already busy area an additional hazard for all road users and pedestrians.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Dr James Backhouse

Address: Flat 293 Lauderdale Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Objection Points:

1. Traffic Congestion and Safety Concerns:

- Narrowness of Long Lane: Long Lane is too narrow to accommodate the significant increase in traffic that a busy hotel will generate. The introduction of additional vehicles, including taxis, Uber cabs, and lorries servicing the hotel, will exacerbate existing congestion and could lead to traffic gridlock, impacting the daily lives of local residents and businesses.

2. Increased Risk of Accidents:

- Danger to Eastbound Traffic: The location's proximity to the Smithfield gyratory presents a hazard as eastbound traffic will suddenly encounter standing vehicles servicing the hotel. This situation increases the risk of accidents, posing a threat to both vehicular and pedestrian safety in the area.

3. Impediment to Local Logistics and Servicing:

- Impact on HGVs Servicing Smithfield: The absence of a rear access road for the new hotel will severely restrict the movement of lorries and other large vehicles servicing both the hotel and Smithfield market. This could block essential east-west travel routes, disrupting deliveries and market operations, vital to the local economy and community.

4. Incompatibility with Local Architecture:

- Disproportionate Scale of Development: The proposed height and volume of the new building are

not in keeping with the character of the surrounding area. The historical and architectural context of Long Lane and its environs should be preserved, and any new development should complement, rather than dominate, this setting.

5. Misrepresentation of Building Height:

- Deceptive Planning Application: The planning application is misleading as it fails to adequately disclose the total height of the development, omitting additional floors designated for plant and equipment. This omission raises concerns about the transparency of the application and the full visual impact of the proposed development.

Conclusion:

The proposed development at 1-8 Long Lane raises significant conce

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Dr Patricia Marsden

Address: Flat 81 Lauderdale Tower Barbican london

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I agree with the suggestion to keep the building height in line with the existing structures on site to mitigate any adverse impact on neighbours; the proposal is significantly higher than any of the surrounding buildings and sets a precedent for further vertical densification directly adjacent to the city's biggest residential development.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Paul Morgan

Address: 321 Lauderdale Tower, Barbican, London EC2Y 8NA

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:1. Proposed height and volume of building not in keeping with surrounding buildings - Deceptive height in planning application that does not mention additional floor(s) for plant and equipment.

2. Balconies and terraces that can hold events that may generate noise thus impacting on nearby residents.

3. Long Lane is too narrow to sustain the additional traffic created by a busy hotel. The danger to traffic heading east and coming out of the Smithfield gyratory as traffic will suddenly encounter standing vehicles such as taxis, Uber cab or lorries servicing the hotel. HGVs servicing Smithfield will get blocked if unable to travel east or west to enter/exit the market. Lack of rear access or road to new hotel to allow movement of lorries servicing hotel. Cyclists heading east will be forced onto coming traffic if the cycle lane is blocked due to taxis or other vehicles blocking the cycle lane.

4. Over development of limited site with serious highway implications.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Nigel Bolt

Address: 61 John Trundle Court Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Traffic or Highways

Comment: The height of the proposed building is completely out of keeping with the surrounding neighbourhood, not only does this create issues around overlooking and loss of light, it will also look extremely silly when viewed from the Barbican.

The outdoor areas will inevitably result in increased noise which will directly affect residents in John Trundle Court.

Long Lane is narrow and a hotel is bound to increase traffic in an already congested road. This will impede traffic going to and from St. Bartholomews and Smithfield Market and will also cause congestion on Aldersgate Street resulting in increased traffic noise, furthermore Aldersgate Street is regularly used by emergency vehicles. Also, I could not find a traffic assessment for the construction phase which must involve part closures in Long Lane.

Accordingly I object to this proposal because it is inappropriate and detrimental to the area.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Paulie Fasoli

Address: 61 John Trundle Court Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I object to this proposal as it represents an overdevelopment of a small plot which is not in keeping with, and will be detrimental to, the neighbourhood.

The height proposed will result in loss of light and raise privacy issues for local residents. The proposed private guest terraces on the upper floors will add to noise and light pollution.

Long Lane is a busy, narrow and already congested road. The increased traffic generated during construction, then continued by guests and hotel service vehicles will add to the poor air quality, noise pollution and endanger pedestrians and cyclists.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Ms Ida May

Address: 57 John Trundle Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The proposed design of the hotel is out of alignment with the current architecture in the area. Especially it being next to iconic Barbican.

The height of the building will block light especially for the residents in Barbican.

And there will be noise, not just when the demolishing the current office building but when the building itself would be ready for it's hotel guests.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Sash Manev

Address: 36 John Trundle court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: There are already enough building sites on our doorstep, resulting in increased pollution, noise and deterioration of our neighbourhood.

There is already construction on the opposite side of that street with massive trucks all day. Having another one will be even worse.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mrs HELEN CLIFFORD

Address: 15 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Traffic or Highways

Comment:1. Hotel not suitable for this location. Access for hotel residents from Long Lane will cause traffic issues if only a small amount of guests arrive and depart via Ubers or Taxis. Parking down that narrow and busy street is impossible.

2. Re-restrict - in line with previous planning consent - the use of the terraces to between 8am-9pm on weekdays only. No live, amplified or other music was to be played on the roof terraces and no promoted events were to be allowed on the premises.

These conditions were imposed in order to "safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3."

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Ms Nora Vitola-Jones

Address: 3 Hayne Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: Having looked through most of the enclosed documents, I have not found a description of how the air quality and noise levels will be monitored throughout the demolition and construction process to make sure the surrounding residents and the schoolchildren of The Charterhouse Square School don't feel the negative impact.

The height of the planned and proposed building is excessive by two to three stories, based on loss of light and change of the landscape to the North of the building. It would set a precedent for building at increased height on the adjacent plot in future proposals. This would affect us directly. If an annual daylight simulation video was provided (which, I believe, has been made during the design process, and if not, could easily be provided by designated architects), the darkening effect could easily be observed. It seems either an oversight or an intentional occlusion.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Nora Vitola-Jones

Address: 3 Hayne Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: Having looked through most of the enclosed documents, I have not found a description of how the air quality and noise levels will be monitored throughout the demolition and construction process to guarantee the surrounding residents and the schoolchildren of The Charterhouse Square School don't feel the negative impact.

The height of the planned and proposed building is excessive by two to three stories, based on the loss of light to the North of the building and the change of the landscape. It would set a precedent for building at increased height on the adjacent plot in future proposals. This would affect us directly.

If an annual daylight simulation video was provided (which, I believe, has been made during the design process, and if not, could easily be provided by designated architects), the darkening effect could easily be observed. It seems either an oversight or an intentional occlusion.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr david Lawrence

Address: 181 Lauderdale Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Dear Sir/Madam

I am writing to object to the current plan to turn 1-8 Long Lane into a hotel, alongside the view that the plans proposed have made changes to original building shape / size which change the impact this building has on the environs.

A proposal to build a hotel on the site has many limitations. It requires different traffic flows which will impact pedestrian traffic on already narrow pavements. In addition the level and frequency of deliveries will need to increase to handle the requirements for food, laundry and similar servicing requirements for a hotel. This will involve greater disruption to normal traffic flows as there is no back entrance for deliveries. I would note that Long Lane is already heavily congested, at times, due to the level of traffic flowing West to East, as the traffic lights provide very limited flows of traffic which are frequently blocked by vehicles turning right into Aldersgate St.

A hotel would need to reinforce more strongly the current limit on external use of rooftop and similar space which is currently applied to office sites with roof / terraced spaces.

Regarding the overall building size of the proposed building and the height. This was objected to in

the original application and is still disproportionate to the area. At nine floors it will exceed the height of the local buildings.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mrs Sally Woodward

Address: 223 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I object to this planning application. The proposed height (including accommodation for plant and equipment) is too high and disproportionate to buildings around the site. If there are to be terraces, their use should be hours restricted so as not to cause unwarranted disturbance to nearby residents. In view of the site's proximity to a large residential community, working hours during construction should be restricted to avoid disturbance particularly at weekends.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Dr Michael Pike

Address: Flat 111, Lauderdale Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity
- Traffic or Highways

Comment: This will impact negatively on safety, traffic flow and accompanying noise and pollution given that Long Lane is far too narrow to accommodate the extra moving and parked traffic associated with this development.

The new building will also impact on the light of adjacent buildings and their occupants.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Richard Tomkins

Address: 333 Lauderdale Tower, Barbican, London EC2Y 8NA

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Traffic or Highways

Comment: I wish to make two objections to the application.

The first is about the immense size of the proposed hotel which would be out of keeping with the character of Long Lane. The northern side of Long Lane has fallen victim to cumulative development whereby each new planning application has built on the height datum set by the previous planning consent. This new application uses evasive language to avoid revealing the true height of the proposed building but it appears that the height would be even greater than the height permitted by the expiring planning consent because of the addition of a further storey accommodating plant and equipment.

The same applies to the mass of the proposed hotel. The previously consented scheme, though far too big for the site, had stepped-back upper storeys to relieve its over-bearing effect on Long Lane. It appears that the proposed hotel would have less stepping-back than the previously consented scheme so that the over-bearing effect on Long Lane would be even greater. The combination of height and mass would turn Long Lane into a darkened canyon.

The second objection is about access. The planning application shows that the developers expect hotel guests to be picked up or dropped off at the kerbside on Long Lane. Some guests will use public transport but many will arrive by taxi, Uber or minibus especially if they have heavy baggage and/or are travelling in groups.

Long Lane is a busy street and the constant arrival and departure of vehicles loading or unloading guests and their baggage will cause severe traffic problems. It will create an especially severe danger to cyclists because every arriving and departing vehicle will block the cycle lane forcing

cyclists to swerve out into the traffic.

The change of use to a hotel should not be permitted unless vehicle access is provided in Long Lane to an off-street drop-off and pick-up area within the hotel premises. And the hotel should be very much smaller than the one proposed.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mrs Sarah Mann

Address: 9 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: I object to the height of the proposed building which is significantly higher than the existing building and which will make Long Lane colder, windier and more unpleasant at street level.

I am concerned that there is no assessment of the potential loss of light to the flats on the West end of Defoe House.

If hotel residents arrive by taxi the cycle lane will be blocked with added risk to the cyclists.

There should be conditions to prevent light from the hotel or noise from the balconies affecting Barbican residents' bedrooms.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Dr Nicholas Deakin

Address: Flat 372, Lauderdale Tower, Barbican Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: The mass of the proposed building and noise/light impact on the surroundings are my primary concern.

First - I am unsure why the requirements / restrictions on terraces in line with previous planning consent are not a pre-requisite here. They should be, eg the use of the terraces to between 8am-6pm on weekdays only. No live, amplified or other music was to be played on the roof terraces and no promoted events were to be allowed on the premises.

These conditions were imposed in order to "safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3."

I am also concerned that this is yet again pushing up the height and mass of buildings on Long Lane. This is higher than other buildings and also previously had a design with stepped back other floors to minimise the impact on the street scene.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Peter Burrows

Address: 192 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Traffic or Highways

Comment: I object to this planning application. Strategic cycle route C11 passes immediately outside of the site, currently in an advisory on-carriageway cycle lane, where the safety of people cycling is already compromised by the narrow roads and high traffic levels. Taxi pick-up and drop-off will inevitably cause cyclists to be forced out of the cycle lanes into the traffic. This will be similar to the disruption to the cycle lanes regularly encountered outside the Sea Containers Lifestyle Hotel at 20 Upper Ground SE1 9PD despite there being a designated drop off area for the hotel in that case.

The transport statement notes that "taxis will be able to make use of the single yellow line kerbside adjacent to the Site. The hotel reception will be located directly opposite this location and will be able to monitor taxi activity at this frontage to ensure that vehicles do not dwell on-street and utilise this kerbside location for short set-down/collection purposes only."

It is extremely optimistic to expect hotel staff to police the road outside.

There is also concern about the safety risk to people cycling using C11 during construction which will further restrict the available carriageway width.

For the attention of:

Anna Tastsoglou Planning Officer

Thomas Roberts MRTPI | Planning Officer (Design)

Urban Design & Conservation | Planning Division | Environment Department

City of London Corporation | Guildhall | London EC2V 7HH

Comment on **Planning History, Design & Access Statement, (Built) Heritage, Townscape
And Visual Impact Assessment, and Planning Statement**

in relation to

23/01417/FULMAJ | Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works. | 1-8 Long Lane London EC1A 9HF

Dear Anna and Thomas –

We're submitting this objection to the above Planning Application as Residents and Business owners on the Southern Side of Charterhouse Square. Many of the names supporting this objection have been residents or had studios or businesses in these locations for over 30 years. Collectively we can recall many changes to the area but throughout them, development of the area has always left Charterhouse Square as one of the very few oases of green and tranquillity in a very busy City of London.

As occupants of offices and homes in the Square we value that, but we also appreciate the large number of visitors who value it as well. The proposed development threatens to overshadow Charterhouse Square as a looming monster lurking over the Victorian southern side and threatens to deprive the occupants of premises on the Southern side of the Square of daylight and sunshine binging noise, disruption and unwanted intrusion through overlooking directly into private residences in a manner which previous proposals dared not suggest.

Below we set out the factual basis for our objections, based on all considerations apart from the extreme loss of Daylight and Sunlight which has been treated separately as a specific topic for additional objections.

Planning History & Implications for 23/01417 FULMAJ

We can be reasonably certain that the City of London Planning archives contain more than enough information on the Planning History, but working from what is publicly disclosed in relation to **18/01020/FULMAJ** and **23/01417/FULMAJ** we have been able to piece together the following timeline of matters relevant to the current application.

Date & Reference	Summary [our emphasis in bold]	Relevance to 23/01417/FULMAJ from perspective of the South Side of Charterhouse Square
2016.02 2018.10.16 D&A Assessment 2.14	The initial pre-application document ...offered office accommodation over 22 stories massing up from seven stories at the west end to a taller element at the east...the principal concern raised by officers was that the scale of the design was considered too tall in relation to the existing character of Long Lane	The applicant has always sought to maximise the height of the structure and this has been a primary planning issue from the outset.
2016.07-09 2018.10.16 D&A Assessment 2.14	Pre Application 2 was submitted in July 2016 and a site meeting held on the 28th September 2016....It was made clear that a massing reduction was required but it was agreed that the height should be determined by visual assessment work and not be set arbitrarily by a predetermined number of stories.	<i>Idem</i> City of London Planning was concerned about the mass of the proposals from the outset
2016.11-12 2018.10.16 D&A Assessment 2.14	Pre-Application Submission 3 was made to the City of London in November 2016... telephone [call] with the Planning Consultant, Montagu Evans, in December 2016.....Upper storeys would only be acceptable if they are not visible in the nearer views from which a pedestrian would be aware of the scale of the building. ...officers still feel that the height apparent on the artists impressions in the closer views are still not acceptable....Building appeared too monolithic for the character of the street.	It appears that a 9 floor building was being discussed in pre-app at this stage, and that the massing and vertical scale was still giving cause for concern.
2017.03 2018.10.16 D&A Assessment 2.14.	Pre-Application Submission 4 was reviewed at a meeting with officers in March 2017. Feedback was provided by email ...The proposals as shown on the day still retained an unacceptably high façade height. The fifth floor was not set back as had been requested. An alternative recessed treatment with a set-back at sixth floor had been developed for comment instead. The overall height of the scheme still remains under review. The acceptability of the extent of the 5th, 6th and 7th floors is dependent on views...the overall height was last discussed in detail and the issue of overall height was to be addressed again when the	City of London Planning was trying to persuade reluctant developers to address the imposing mass of the proposed development through reduced height and stepping back upper stories.

Date & Reference	Summary [our emphasis in bold]	Relevance to 23/01417/FULMAJ from perspective of the South Side of Charterhouse Square
2017.04 2018.10.16 D&A Assessment 2.14	4th and 5th floor modelling had been agreed. Pre-Application Submission 5 was reviewed at a meeting with officers in April 2017. Discussion and design variations focused on the façade and the effective separation of same – e.g. objection to 5 th floor faience.	n/a – the debate at this stage was concerned the extent to which the façade, which encompassed all of 1-8 and 9-12 Long Lane, should look like one edifice or two “shoulder buildings” with a faience structure in the middle
2017.07-10 2018.10.16 D&A Assessment 2.14	The City of London Culture Mile Initiative, linking the new Museum of London site with existing cultural institutions at the Barbican, earmarked as a space of interest the open area between 1 Long Lane and the corner of Aldersgate as in the context of the Culture Mile initiative....the impact of the loss of this area, and options for its relocation at upper floors was presented to officers... providing the lost area from the open public space on a new 10th floor . In October, officers reported they were uncomfortable with the appearance of the upper floor massing from the Aldersgate Street/ Beech Street junction. Officers suggested a re-massing of the eastern end to mitigate views of the upper floors.	The developer sought to recover “lost” footprint by resorting again to increased height, with Officers pushing back on the extent to which this risked creating a monolithic façade. Until this point, the developers had acquiesced in reducing then height of the building to less than 9 floors (which stands as precedent against the proposals in 23/01417/FULMAJ)
2017.12 2018.10.16 D&A Assessment 2.14	Pre App 7 presented a response to officer’s concerns over the upper storey massing... fenestration design fronting on to the open space and facing Aldersgate Street was revised to a smaller window proportion that better reflects the building fenestration on the Long Lane façade ...	Officers continued to push for reducing the visual impact of the upper stories through recessing them and considered large fenestration (as per proposal 23/01417/FULMAJ) to be inconsistent with the surrounding area.
2018.01 2018.10.16 D&A Assessment 2.14	In January 2018 ...a schemelowering the central and westernmost plots by one floor at street frontage. ...the scheme was certainly seen positively on how the remodelled corner felt ... However, the vertical differentiation of the Long Lane façade appeared to have been lost in the new scheme. “The continuous unbroken attic floor ...results in an impression of a more monolithic structure....	Baby steps in the direction of reduced massing.
2018.03 2018.10.16 D&A Assessment	Pre-Application 9 was discussed on the 23rd of MarchIndications on how the upper floors and terraces and perhaps	View of structure from Long Lane reached a satisfactory state to proceed to Planning App but still several issues

Date & Reference	Summary [our emphasis in bold]	Relevance to 23/01417/FULMAJ from perspective of the South Side of Charterhouse Square
2.14	rear facade would accommodate amounts of planting... Provide further drawings for Northern facade - and limit potential light spillage to Charterhouse Square.	including impact on Charterhouse Square
2018.06-07 2018.10.16 Assessment 2.14	<i>D&A</i> Pre-Application 10 was discussed in July 2018 ...feedback was gave (<i>sic</i>) on an email from the 19th July and the overall scheme was accepted subject to further information on daylight/sunlight and extra CGI views which were supplied to the planning officer	A reliable Daylight and Sunlight assessment was required for the application to proceed.
2018.10 2018.10.16 D&A And D&A 6.03	16 th October, 2018 Planning Application 18/01020/FULMAJ was filed to redevelop the existing buildings at 1-12 Long Lane, London EC1A 9HA (the 'Site') with an office building of up to 9 storeys, with retail uses at the ground floor and basement.	Planning Application filed for up to 9 storeys (plus ground plus plant on roof so 10 stories to the layman, and in fact per the cross sections submitted as part of the D&A Assessment
2018.11 2020.10.27 Committee Report pp16 BRE 2018.12 BRE 2019.02	First Consultation resulted in more scrutiny and drew 27 Objections. An independent Daylight and Sunlight analysis of the D&S Assessment was commissioned from BRE which drew attention to the fact that the 41-43 Charterhouse Square had been omitted entirely from the Daylight and Sunlight Assessment produced in respect of the Application. BRE concluded that Point 2 (the authors of the Daylight and Sunlight Assessment) had used inappropriate VSC target values to justify their assessment of limited impact on 41-43 Charterhouse Square – concluding that the development would have “ a major adverse impact ” on the residents.	Notwithstanding the fact that the properties on the South side of Charterhouse Square are those most affected by loss of light, the developers chose to ignore the impact on these buildings – a disposition which continues to the present day. The impacts of the current development are similar.
2019.12 2020.10.27 Committee Report pp16	As a result of objections raised and concerns expressed by City of London Planning Department, a new application was submitted on 13 th November, 2019, leading to a new round of revised reports, consultations, objections and subsequent revisions. The new Scheme involved a reduction in massing through the removal of the	In its most recent Daylight and Sunlight Assessment, Point 2 continues to “interpret” and. “adjust” BRE guidelines so it can justify any loss of Daylight and Sunlight as “acceptable”. Notably, BRE was again called on to independently assess the Revised Daylight and Sunlight Assessment and found Point 2’s methodology “dubious”, reiterating their opinion

Date & Reference	Summary [our emphasis in bold]	Relevance to 23/01417/FULMAJ from perspective of the South Side of Charterhouse Square
<p>2020.03 2020.10.27 <i>Committee Report pp16</i> 2020.03.09 <i>North Elevation</i></p>	<p>ninth floor and plant enclosure above and a reduction in the footprint of the seventh and eighth floors.</p> <p>Revisions to the scheme and further alterations involving set back elevations on the north west corner of the building at fifth to eight floors to minimise the daylight impact on Griffin Court.</p>	<p>from a year earlier that the impact would count as “moderate to major adverse” on the residents of 41-43 Charterhouse Square.</p> <p>Most of the revisions appear to relate to 9-12 Long Lane Superseded plans show 8 floor structure well stepped back from the East to the Centre</p>
<p>2020.09 2020.10.27 <i>Committee Report pp16</i> 2020.07.29 <i>Southern Elevation PL05</i></p>	<p>Additional changes were introduced including the removal of the eighth floor and the further setting back of the fifth, sixth and seventh floors from the western end of the building to minimise the daylight and sunlight impact on surrounding properties...</p>	<p>This appears to be the final scheme which was submitted for planning – revision 5 of the elevations show a ground floor of 5m from the lower western-most datum (12 Long Lane) reducing to ~4m at the eastern end (1 Long Lane), 6 further floors at 4m per floor of 4 bays from the east and a 7th floor of 9 bays in the centre (~32m total) to accommodate plant on the roof.</p>
<p>2020.08.29 2020.08.29 Revised Application</p>	<p>Revised Application Submitted. The original application was for 72% expansion of internal area (5,595 to 9,600 square m). while the revised application was submitted proposing a 57% expansion of the site in terms of square footage (5595 to 8,800 square m)</p>	<p>23/01417/FULMAJ entails an GIA expansion of 64% (3,225 to 5,277 square m) plus roof space and balconies for hotel guests, and so is closer to the rejected site utilisation than the final proposed application.</p>
<p>2020.10.02 <i>Revised Daylight and Sunlight Report</i></p>	<p>Further Daylight and Sunlight Assessments were commissioned and reviewed by BRE</p>	<p>BRE reiterated their previous assessments criticising Point 2’s methodology as “dubious” and recognising severe loss of daylight and sunlight amenity to the South side of Charterhouse Square while conceding that the impact was less damaging than previous schemes, but still severe for all except 3rd and 4th floors.</p>
<p>2021.07.20 2021.07.20 <i>Decision</i> 2020.10.27 <i>Committee Report PP 123 -127</i></p>	<p>Conditional Planning Approval Granted Salient Conditions: (1) Work on site to start by 2024.07.20 (2) Eight storey office (Class B1) building with basement and lower basement with retail (Class A1/A2/A3) – much less intrusive on existing residential properties than a hotel</p>	<p>Condition 30 prohibits the use of terraces between 21:00 and 8:00, and weekends and holidays. This condition precludes balconies outside any hotel’s public or private spaces.</p>

Date & Reference	Summary [our emphasis in bold]	Relevance to 23/01417/FULMAJ from perspective of the South Side of Charterhouse Square
2023.12.22	<p>(3) Condition 30 The terraces hereby permitted shall not be used or accessed between the hours of 21:00 on one day and 08:00 on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p> <p>(Condition 30 was further explained by the Committee Report)</p>	<p>23/01417/FULMAJ Filed – to repurpose the site as a hotel on substantially the same foot print as regards 1-8 Long Lane, but with much greater massing.</p>

Links for Timeline

- [2018.10.16 D&A](#)
- [BRE 2018.12](#)
- [BRE 2019.02](#)
- [2019.11 Application](#)
- [BRE 2020.01](#)
- [2020.03.09 North Elevation](#)
- [2020.07.29 Southern Elevation PL05](#)
- [2020.08.29 Revised Application](#)
- [2021.07.20 Decision](#)

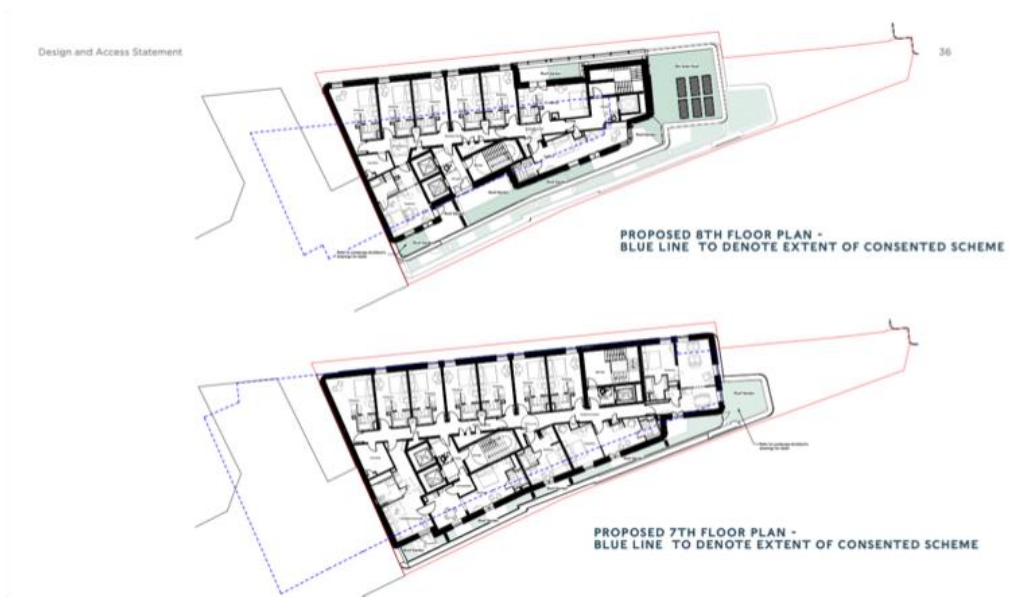
Issues Arising from Application 23/01417/FULMAJ

(1) The Height and Massing of the Building

- a. The height of the proposed development appears to be within the bounds of the previous plan according to the Design and Access Statement but it is very difficult to make the numbers add up.
 - i. The timeline above shows that over 5 years of negotiation CoL Planning successfully reduced the height of proposed development 18/01020, from an initially idiotic 22 stories to 7 floors including roof. It is difficult for the layman to judge the height of the design from the historic plans and it is clear that the datum drops somewhat from East

- to West but overall it seems that the final design was ~32-33m at its highest from ground level, with ~3-4m accounted for by housing for plant on the roof.
- ii. The Design and Access Statement for 23/01417 (4.3 p.37) states that *“Our proposed building, excluding plant equipment, is approx. 350mm lower than the 2021 consented scheme.”*
 - iii. The only filed source for the maximum height of 18/01020 final plans seems to be the Elevations revision PL05 cited above, but these include 4m for the 7th floor roof.
 - iv. It therefore follows that 23/01417 is at least **3650mm higher** than 18/10120 and this is possibly signified by the faint dotted green line in the plans which comment on the Massing Comparison in the Design & Access Statement (4.3 p.37)
 - v. The increase in height is consistent with the negative impact on Daylight and Sunlight presented by Point 2 with regard to the South side of Charterhouse Square, when 18/01020 is compared with 23/01417.
- b. Opportunity to revisit height of proposals for the site in light of realistic visuals
- i. The fact that the developer no longer proposes to avail itself of the conditional consent granted in respect of 18/01020, provides CoL Planning with an opportunity to revisit the visual impact of the height of the development on this site from critical perspectives which were not adequately reviewed in the earlier planning application.
 - ii. Any reader of the (Built) Heritage, Townscape and Visual Impact Assessment, which was submitted as part of 23/01417, is struck by how selective the view points for the visual impact are and the extent to which the authors make efforts to disguise the impact of the proposal (as was the case with a similar report in connection with 18/01020)
 - iii. One view which cannot be disguised at all is the one directly South of the proposed development from Cloth Street, but it is noticeable that the authors of the report have moved the standpoint slightly to provide a more favourable comparison with 18/01020, which is not in truth merited (see below)
 - iv. It is difficult to understand why no visual impact from directly north of the site was submitted in the case of 18/01020, or now in the case of 23/01417, when such views are readily obtainable, unless it was because the result was considered highly detrimental to the application’s chances of success.
 - v. In fact, the Design and Access Consultants (Emrys) did include a view from directly north of the proposed development in 2018, but only as a section break page in connection with their report supporting 18/01020, but this view (although clearly readily available) was not considered as an assessed viewpoint (see below)
 - vi. Proper assessment of the proposal should no longer make reference to plans which were granted conditional approval in 2021, but should assess the entire façade of the north side of Long Lane from the CrossRail building to Aldersgate (from the South) and take several perspectives from the North, which means several different viewpoints in Charterhouse Square (see below)
- c. Massing – the stepping back of the upper stories which CoL Planning fought for and largely delivered with respect to 18/01020 is discarded in the proposals for 23/01417.
- i. The timeline clearly shows that CoL Planning considered the stepping back of the upper stories of the proposed 18/01020 to be critical in securing conditional approval for same.
 - ii. To obtain permission for the prior development, the applicants extolled the “stepping back” of the upper floors as both reducing the massing effect of the building and providing an opportunity for green spaces. E.g.

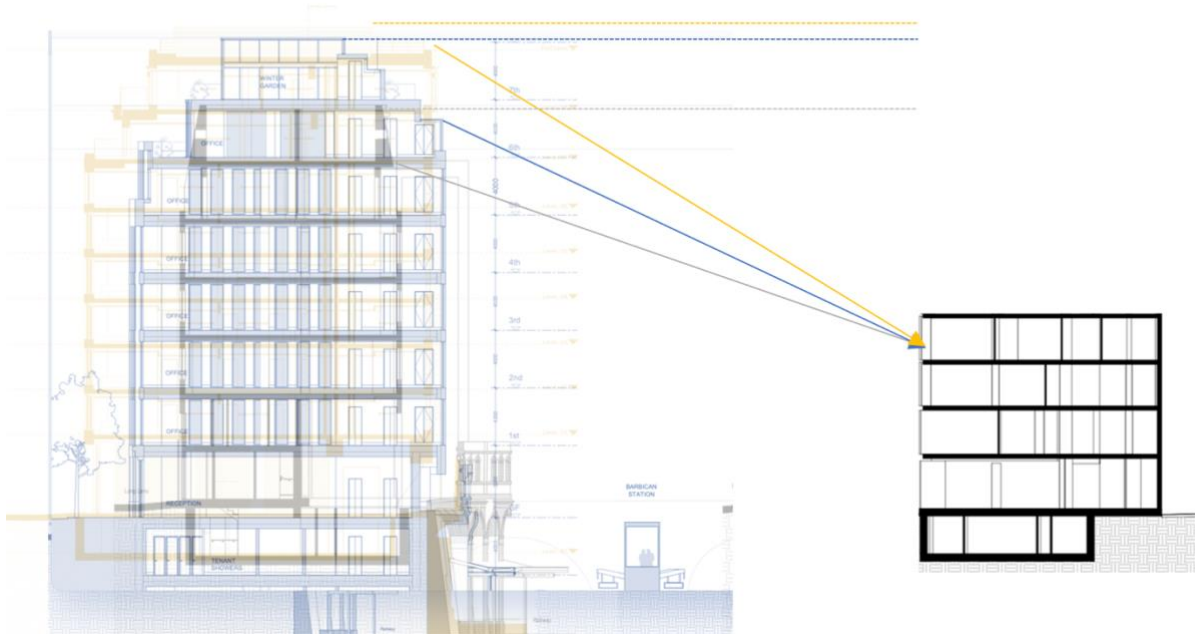
1. 18/01020 Planning Statement 4.9 *“The massing / floor plates of the building reduce as the building steps back from Long Lane to respond to the townscape.”*
 2. 18/01020 Planning Statement 4.10 *“The setbacks provide the opportunity for terraces and urban greening at each set back level. Greening is also taken around to the rear façade at these levels.”*
 3. 18/01020 Planning Statement Addendum (2019.11 Changes to the Proposed Development) 3.2 *The extent of the eighth floor has been reduced substantially and incorporates a plant enclosure within it and a small winter garden. It is set back from the rear elevation by approximately 3.5m. **The eighth floor is reduced in width by approximately 15m along the northern boundary.***
 4. 18/01020 Planning Statement Addendum (2019.11 Changes to the Proposed Development) 3.3 *At seventh floor level the building would be set in from the east by 13m. **This reduces the width of the floor along the northern boundary by approximately 15m.***
- iii. There are many other examples in the records of the importance placed on the “stepping back” of the upper stories both from the East, West and North boundaries of the site and it is extremely difficult to conclude otherwise than that these changes to the proposals were the *sine qua non* for the eventual conditional approval of 18/01020 in July, 2021.
 - iv. The “stepping back” is radically reduced in 23/01417: on the seventh and eighth floors, there is a sizeable increase in massing to the East, North and South to the extent that the “stepping back is eliminated”.



(from 23/01417 Design & Access Statement 4.3, p.36)

- v. It is very difficult to appreciate the impact of the massing on neighbouring buildings from the drawings and plans which have been provided in support of the application. It would be helpful to show an extended site cross-section, based on Sections A-A, B-B, and C-C (per below) which includes 42/43 Charterhouse Square and uses coloured lines to show the outline profile of (a) the existing building (b) the previously proposed schemes. These sectional drawings are missing from the publicly available files but must have been filed with the other application plans on 26th September, 2018, must have been debated, discussed and ultimately rejected and adapted in the eventually consented scheme from 18/01020. Comparison of the sectional drawings for the consented scheme and the the currently proposed scheme, is indeed essential so that the incremental massing impact of the set-back to floor 8 can be adequately considered by CoL Planning and all affected properties.

The below provides an illustration of the suggestion and also serves to demonstrate the extent of the height and massing issue from the perspective of the properties on the South side of Charterhouse Square (23/01417 impact shown in yellow and 18/01020) shown in light blue, with nearest point from 18/01020 in grey).



- vi. Massing of this extent has been such a critical issue since development of this site was first proposed in 2016, therefore it is difficult to believe that it can be countenanced in the context of 23/01417
- vii. Other Planning concessions (e.g. the extent of lost Daylight and Sunlight beyond BRE guideline levels; maximum elevation slightly more than CrossRail etc.) were no doubt granted in lieu of reduced massing, therefore it is difficult to believe that the entire precedent of consent for 18/01020 should not be revisited in every respect. Otherwise, the developers are incentivised to secure planning on a different basis ever year or so, taking their concessions as the new base line and expanding on that until they have a 22 floor building as originally sought.

(2) A Hotel is very different from an Office

- a. In the context of 18/01020, CoL planning recognised that a much larger office development would have a negative impact on the private residences in the area and the townscape generally. Conditions were imposed when conditional approval was granted to 18/01020 in July, 2021 and Condition 30 has been cited in the timeline above.
- b. Other conditions in the formal decision (31-33) made efforts to ensure that there would be no incremental noise pollution as a result of the development (no musical events, no promoted events, no external live or recorded music).
- c. The Committee deliberations (2020.10.27 Committee Report paragraphs 123 -127) explained the rationale of these conditions in more detail as follows:
 - i. *125. Residents have raised objections that the proposed terraces would give rise to increased noise nuisance and overlooking over nearby residential properties and have suggested that the hours of use of the roof terraces should be limited by condition.*
 - ii. *126. The proposed terrace at seventh floor has been designed and located to help ensure that there would be no direct overlooking of the adjacent residential properties on the upper floors of Griffin Court, 13 – 17 Long Lane. The terrace has been set back*

from the western edge of the building and the layout has been designed to include a landscaped buffer zone along their western perimeter, to further reduce the potential for overlooking. The western end of the proposed terrace at sixth floor level is considered to have the potential to overlook the residential premises at Griffin Court. Therefore, a condition is recommended restricting access to the western end other than for maintenance purposes or in the case of emergency.

- iii. *127. The hours of use of the terraces would be restricted by condition so that cannot be used or accessed between the hours of 21:00 on one day and 08:00 on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency*
- d. The terraces originally proposed for an office building have become roof gardens for rooms or communal use in the proposal 23/01417. A hotel cannot at the same time charge guests for these amenities and then tell them not to use them, so it is clear that the applicant is really asking for the revocation of another important condition to the conditional approval of 18/01020.
- e. While at first reading, the references to Griffin Court may seem irrelevant, given that 23/01417 does not propose the development of 8-12 Long Lane, the principle is very much at issue with regard to the proposal's reclaiming of the "stepped back" footprint to the North and South for the creation of balconies, which threaten the same level of overlooking in those directions, as was the case with regard to Griffin Court in 18/01020.
- f. It would follow that the restrictions which were applied to the terraces to the West in 18/01020, should be applied to the North and South elevations with respect to 23/01417, though of course, this is entirely unworkable for a hotel.
- g. It is also worth noting, that given the height of the structure and floor plans which disclose rooms with views to the north, these rooms will overlook and infringe the privacy of all residential dwellings to the North of the site, particularly on weekends and out of office hours, which would be less of an issue with an Office building.

(3) Planning with respect to 8-12 Long Lane – Cumulative Impact

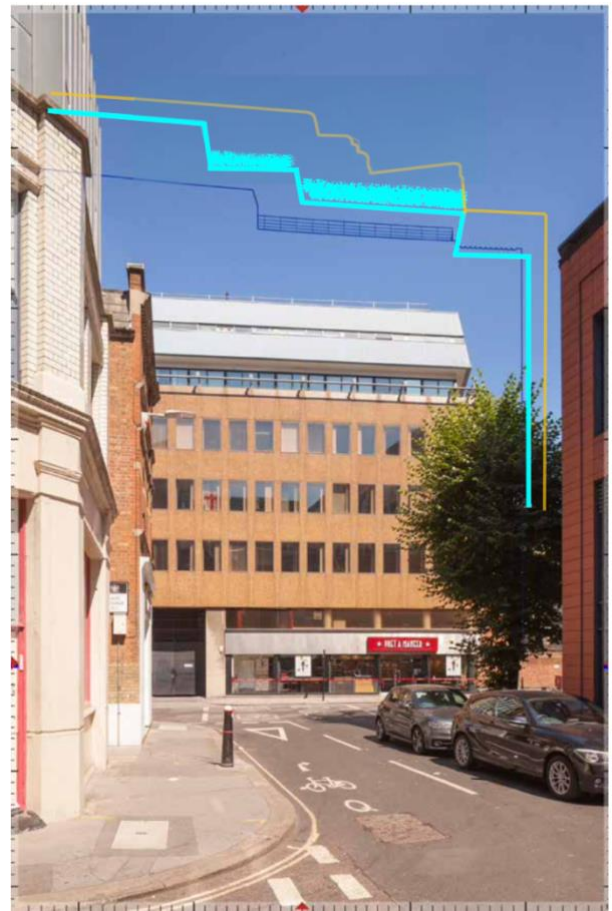
- a. The elephant in the room with respect to 23/01417 is what planning application will be pursued with regard to 8-12 Long Lane, also owned by the applicant.
- b. In absence of a definitive application, it looks very much as though the applicant has decided to divide the site, to maximise planning gain on one part and then use that as precedent for the next part, so that the cumulative effect is to secure concessions which have in principle been rejected already.
- c. The danger for residents can be quantified to some extent by reference to the Daylight and Sunlight Assessment.
 - i. Assuming that the authors of the Daylight and Sunlight Assessment were at least consistent in application of their "dubious" methodology, their calculations show that the **entirety** of the negative impact expected from 18/01020 on the South side of Charterhouse Square is matched by the negative impact of 23/01417, which includes no allowance for the development of 8-12 Long Lane.
 - ii. If these limits – which are outside the BRE guidelines – are allowed to be utilised fully through 23/01417, then what protection do residents have with regard to their residual Daylight and Sunlight amenity, and what protection is offered that it is not to be removed altogether through the cumulative impact of incremental applications ?
 - iii. Without a categorical undertaking that there will be no development of 8-12 Long Lane – which seems contractually impossible – the occupants of properties on the South side

Charterhouse Square (and many others) can simply await a further unspecified deterioration of their amenities, well beyond that inflicted as a result of conditional approval for 18/01020.

(4) Visual Impact – Viewpoints from North and South Matter

- a. Given that the development is built along an approximate East-West Axis, the issue of Massing and Visual impact is best appreciated from North and South perspectives.
- b. The Heritage Reports which have accompanied both 18/01020 and 23/01417 suffer from the absence of views from direct North, and it is surprising that this bias was not challenged in the case of 18/01020, but the examination of 23/01417 provides an opportunity to address this.
- c. Apart from the statutory LVMF assessment from Alexandra Palace – which in the case of the Heritage and Visual Impact Assessments associated with both 18/01020 and 23/01417 disclose little more than an abundance of foliage – most of the views are oblique East and West Views of the proposed developments. The exceptions are those from Cloth Street to the South and Charterhouse Precincts, when other potential viewpoints from the North would serve to demonstrate the extent of the visual impact more concretely.
- d. South Perspective Cloth Street:
 - i. The Heritage, Townscape and Visual Impact Assessment for 23/01417 section 10.45 and 10.46 shows the mass of the proposed plan from Cloth Street, but takes a view point which is inconsistent with the viewpoints adopted for previously rejected and the eventually consented scheme 18/01020 in order to show a more favourable comparison.
 - ii. The below left views is as presented in the Heritage, Townscape and Visual Impact Assessment for 23/01417 section 10.45 (in yellow) , the view on the right shows the profile of the new proposals per 23/01417 section 10.45, in relation to the visual impact assessment from 18/01020 Revised Addendum Built Heritage, Townscape and Visual Impact Assessment from August 2020, showing the outline of the previously proposed (i.e. rejected) plan in light blue as well as the eventually consented plan in dark blue

- iii. Comparison of the three views from the same viewpoint shows that the vertical profile of the proposals under 23/01417 are more imposing than the revised and previously proposed schemes of 18/01020, and would completely dominate the view of Long Lane from Cloth Street.



- iv. CoL Planning should also consider the submission of alternative views from further south along Cloth Street to fully assess how much the proposed development imposes itself on the Cloth Fair and St Bartholomew character area, particularly in relation to previously proposed schemes which were revised specifically because of the extent of the imposition they forced on the area.
- e. Charterhouse Square
 - i. The Heritage, Townscape & Visual Impact Assessment is modelled on that submitted in the context of 18/01020 originally and as revised in 2020. It takes two viewpoints from the North within the selected Townscape Area Plan area No 1, being Charterhouse Square.
 - ii. As noted above, this is an odd omission when there are several other unobscured viewpoints available with serve to demonstrate the imposing nature of this as well as the previously proposed schemes.
 - iii. Emrys- the authors of the Design and Access Statement in connection with 18/01020 - did include one such view in the original D&A Statement, but only as a section separator [18/1020 D&A Part 3](#). Nonetheless, the view is instructive especially in light of the claims that *“Every effort has been made to respect the massing of the consented scheme.”* Since we can observe that this is not true with respect to the “stepping back” of the eastern elevations we can judge that the below CGI view of the previously proposed (i.e. rejected) scheme- while completely dominating the view from Charterhouse Square, is

nevertheless not as imposing as the scheme presented in 23/01417. The relevance of



the impression to the current application is emphasised by the fact that the western section (9-12 Long Lane) which is not part of 23/01417, is obscured by foliage in the CGI.

- iv. The above view also shows that it is possible to analyse the visual impact of the scheme from other viewpoints in Charterhouse Square and indeed suggests that it is negligent not to do so, given that this is the one public green space in the entire Townscape Character Area where people can congregate to escape an entirely urban environment (much as is illustrated in the above CGI).
- v. It is also somewhat cynical that the only view illustrated by authors of the Heritage, Townscape and Visual Impact Assessment for 23/01417, is clearly taken in summer from the extensive foliage which obscures any view of the site whatsoever. It should be recalled that the date of this Assessment is December, 2023 when the trees are not in leaf, and that in the introduction to this report we can find the statement “*The photographs were taken in winter 2023, and so capture deciduous trees without their foliage, in line with best practice.*”
- vi. In addition, the claims in section 10.68 of this report are evidently false, as demonstrated by the above CGI.
 1. *10.68 The experience of the view is likely to be transient, while walking through the Square. Some receptors may sit in the garden in a similar viewing location, although this would be closer to the Proposed Development, where it would be more screened by interposing development.*
- vii. While viewpoint 10 has been selected to show a picture of lime trees in leaf in mid-summer, view point 11 has been selected to show that if a “receptor” is sufficiently far northwest within the private precincts of medical college grounds, it is difficult to see above the northern elevations of the Charterhouse. Neither view is representative of the impact of the development on the publicly accessible areas of Charterhouse Square.

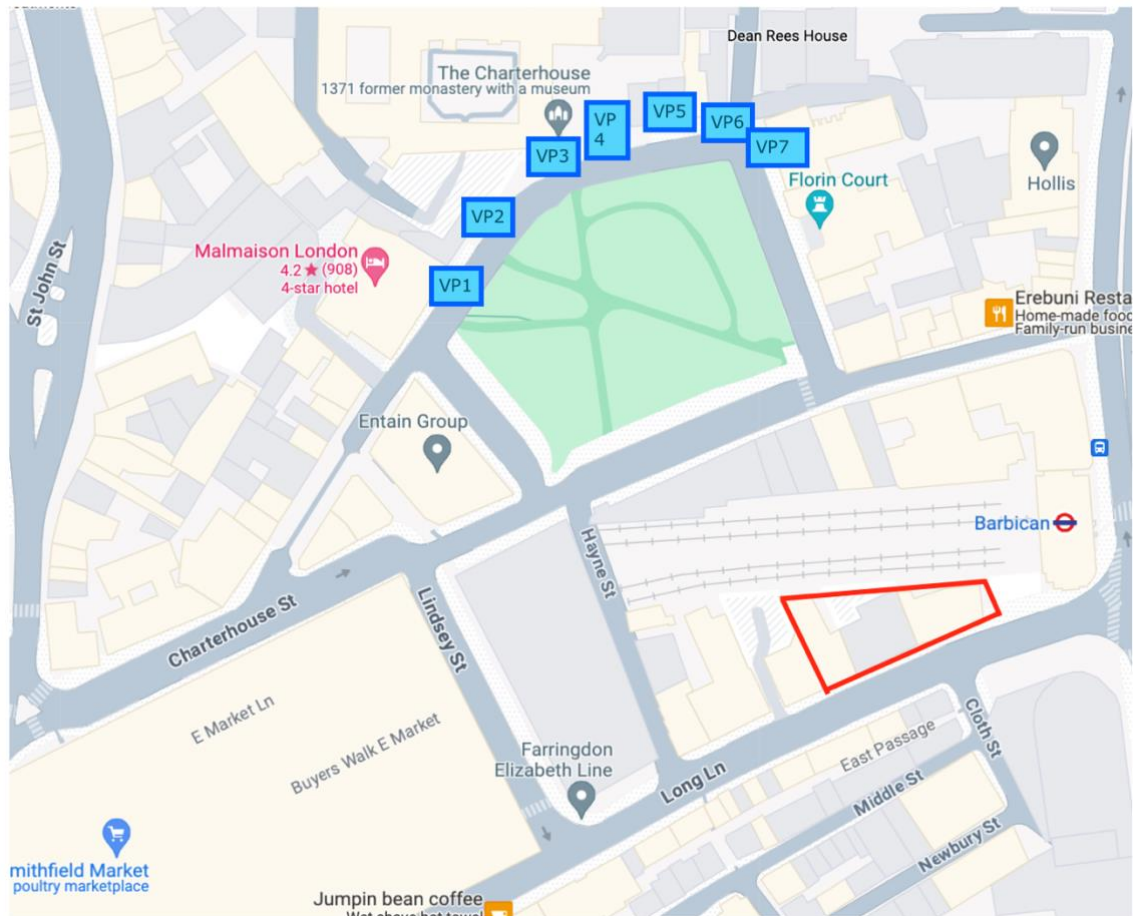
Heritage, Townscape and Visual Impact Assessment View 10



Heritage, Townscape and Visual Impact Assessment View 11



- viii. More relevant viewpoints are clearly available, especially from November through April when foliage interferes less with the views, as illustrated below.



- ix. To explore further the suggestion that the true impact of proposal is best appreciated by making use of alternative viewpoints, some crude illustrations are presented below. The CGI noted above (e.iii) serves as a decent proxy for VP4 above.

viii. View Point 2 (VP2)



ix. View Point 7 (VP7)



- x. Further crude illustrations of the visual impact on Charterhouse Square are possible but hopefully enough have been provided here to prove the case that alternative view points in Charterhouse Square need to be examined and hopefully before there is an abundance of foliage to disguise the impact of the proposals.

In summary, application 23/01417 is retrograde.

- (a) The proposal inflicts a material adverse impact in terms of height and mass achieved in the scheme of 18/1020, and rescinds many of the adjustments made in the period 2016-2021 when the developer was negotiating an accommodation which eventually resulted in consent for a much altered scheme.
- (b) The applicant does not recognise any of this, treating the “consented scheme” as a base-line on which further expansion in terms of height and massing can be delivered.
- (c) The proposal for a Hotel is very different and will intrude on residential properties and radically affect the privacy of existing residents of the area, as well as running contrary to the specific planning conditions of the “consented scheme”, in a further illustration of (b) above.
- (d) The proposal is silent with respect to the development of 9-12 Long Lane but given that both properties are owned by the same party and previous consent has been sought for the development of both as part of a single scheme, and that future development of 9-12 Long Lane could lead cumulatively to a further material adverse impact on the area, the residents and the historic townscape. It is impossible to consider 23/0147 without securing contractual undertakings with respect to 9-12 Long Lane.
- (e) The Visual Impact of the proposed scheme is significant and adverse on the neighbourhood and cannot be analysed adequately based on the carefully selected and foliage obscured visual images which have been submitted in support of the scheme. In particular, CoL Planning should seek an independent report which considers alternative view points which are more likely to do justice to the impact on Charterhouse Square.

The undersigned occupants of properties on the South side of Charterhouse Square object to the proposed development 23/01417.

Neal Birnie
Casimir Fulleylove-Golob
Peter Golob
Claudia Janesenwillen
Stefan Kaszubowski
Robyn Minshall
Peta Turvey
Sophie Walter
Richard Wentworth

Miranda Fulleylove
Ralph Fiennes
Juliet James
Kirstin Kaszubowska
Ian Logan
Jörg Mohaupt
Shane Walter
Jane Wentworth

Sent by: Peter Golob, Flat 6, 42 Charterhouse Square, London EC1M 6EA

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Jonathan Vaughan

Address: Guildhall School of Music & Drama Silk Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I support the proposal on the basis that it will enhance the area for tourism and cultural engagement, increase footfall and support the objectives of Destination City.

Comments for Planning Application 23/01417/FULMAJ

Application Summary

Application Number: 23/01417/FULMAJ

Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Case Officer: Anna Tastsoglou

Customer Details

Name: Mr Tom Elliott

Address: 32 Great James Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:GMS Estates Ltd (GMS) are freeholders of CAP House immediately adjoining 1-8 Long lane. GMS are fully supportive of the repurposing of an unused 1970's office building to create high quality hotel accommodation. The future development plans for the Museum of London and the 'Cultural Mile' will inevitably require hotel accommodation within the vicinity. 1-8 Long Lane is situated next to the Barbican Station and the Elizabeth Line Farringdon (Long Lane) entrance is 100 yards away. It is perfectly located to fill the hotel requirements for the Museum of London and indeed wider London with its links to the TFL network.

Peter Golob
42 Charterhouse Square
London EC1M 6EA

21st April, 2024

E | [REDACTED]
M | + [REDACTED]

Comment and Objection to 23/01417/FULMAJ based on Daylight and Sunlight Assessment in relation to the proposed Development of 1-8 Long Lane

In the weeks since submitting an initial objection to the above development, solely from my own perspective, on the grounds of the evident misrepresentations and concerning inaccuracies contained in the Daylight and Sunlight Assessment prepared by Point2, further consideration has produced evidence that this report is wholly inadequate. Its failings appear to be so manifest that it raises questions as to whether the report can be relied on to assess the material consideration of the impact on neighbouring properties' daylight and sunlight amenity. We strongly recommend that City of London Planning should oversee the commissioning of an alternative and independent report by consultants appointed directly by, or in consultation with, City of London Planning (see 3 below).

D&S is a complex area, and not one which can easily be contested without expert advice. There are BRE guidelines, but some of these are open to interpretation or adjustment, depending on the particulars of the area being considered. For this reason, and because there is necessarily doubt about the assemblage of the base data, and the analysis or conclusions of the Point2 submission, it would be in the interests of all residents, businesses and CoL Planning to have access to a completely independent report, with the benefit of independently verified data and calculations which all stakeholders can agree have been prepared with the requisite degree of professional integrity.

Our suspicions are aroused because wherever we can cross-check a fact as presented, or a supposition or conclusion, we find an issue with the Point2 D&S Assessment. By extension, we can have little confidence that those areas we have not been able to cross-check serve as examples of a different standard. This criticism extends to the base data, which should be verified independently, rather than accepted and reviewed as in previous third party commentaries.

- (1) The Daylight and Sunlight Assessment submitted by Point2 ("D&S P1348") is dated December, 2023, but it is clear that it relies almost entirely on information dating from 2018 or before. For example, the section detailing Window Maps still does not include any windows from 41-43 Charterhouse Square, as per the original report compiled in relation to planning application 18/01020/FULMAJ. This was criticised at the time of that application and Point2 were forced to conduct additional work to make good these failings in relation to that application. Because Point2 conducted that analysis as a separate exercise, it is

probable that the inclusion was omitted in the “cut and paste” from the 2018 report, suggesting some sloppiness which concerns us.

- (2) The fact that the report is out of date, means it relies on out-of-date data. For example, D&S P1348 states (p.3)

Detailed daylight and sunlight assessments have been carried out to the surrounding residential habitable room windows on Long Lane, East Passage, Middle Street, Cloth Street, Charterhouse Square and Aldersgate Street. In accordance with the BRE guidelines detailed assessments have not been carried out to the surrounding commercial or non-habitable room windows, with the exception of the windows which serve Charterhouse School, as they are not considered to have a reasonable expectation of daylight or sunlight. (my emphasis)

and

We have obtained some floor plan layouts from the City of London’s planning portal, however, are of the understanding that the school occupies the basement and ground floor levels of 38-39 Charterhouse Square and all floors of 40 Charterhouse Square as shown within the purple bounding lines below. (p.24)

leading the authors to propose the window map below (p.25)



Figure 10: Window Map of Charterhouse School

In fact, in the time which has elapsed since early 2018 when we presume the underlying work for D&S P1348 was conducted, the school has expanded and for some time has occupied the entire set of buildings from the main entrance at 33 Charterhouse Square through and including 40 Charterhouse Square at all floor levels as well as the roof. Independent reviews of the school compliment all aspects of the school – approach, curriculum, academic

standards, - and include the internal design (“corridors are wide, bright and functional with space for desks”) (e.g. [school-reviews/ charterhouse-square-school/](#)).

All the windows of all buildings from 33-40 Charterhouse Square should form part of any D&S Assessment, and not just those identified in 2018 and outlined in purple, as noted in a report dated 19th December, 2023.

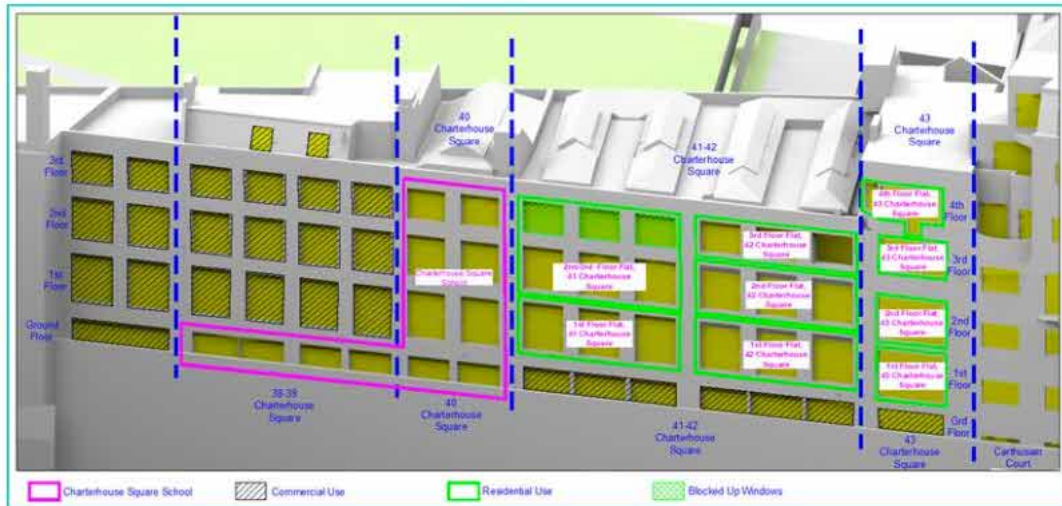


Figure 9: Elevation to northern Side of the Railway Line

The above is but one example of the omissions and inaccuracies which are evident in the report and stem directly from the submission of a report which purports to date from December, 2023 when the underlying work seems to have been carried out approximately five years previously.

The above is critical since loss of light to school children in classrooms should be of concern to all, as noted in the first of the BRE reviews of Point2’s previous D&S Assessment in relation to 18/01020/FULMAJ (see below 3.a.iv, 3.d.iii)

- (3) Nothing in the prior history of Point2’s conduct in relation to this and prior applications relating to this site suggests that the analysis presented can be relied upon. In the period 2018-2020, Point2’s D&S Assessment in relation to 18/01020/FULMAJ was heavily criticised and independent reviews of their work were conducted on four separate occasions.
 - a. BRE prepared a review of the original D&S Assessment from July, 2018 (no longer available on the planning website) for CoL Planning which was issued on 20th December, 2018.
 - i. The remit of this report was “to review the scope and methodology, text and conclusions of the report, but not verification of the calculations.” (p.2)
 - ii. The initial submission was criticised for ignoring 41-43 Charterhouse Square, and 18-21 Middle Street. (pp.2, 11,13)
 - iii. The report was also criticised since “Point2 have sought to determine alternative target values for daylight and sunlight...[but] Point2’s choice of comparable area is dubious. Suggesting that Point2 would be better advised to utilise as comparators the “more generously spaced residential buildings on the Barbican Estate or in Charterhouse Square.” (p. 6)
 - iv. BRE chided Point2 for its cursory analysis of the impact of the proposed development on Charterhouse School, noting “There would also be a

significant impact on daylight distribution to five of the six rooms analysed. Daylight provision is particularly important for young children, and the negative impact will depend on what the use of the rooms is and whether the children will be in them all day.” (p.11)

- b. The above report by BRE led to additional D&S submissions, which BRE reviewed in February 2019, in which Point2 addressed some of the omissions from its original D&S Assessment.
 - i. BRE noted that Point2 had now considered 41-43 Charterhouse Square commenting that the impact would be well outside the BRE guidelines for the impact of new developments on existing residences, with VSC reductions of 45-60%
 - ii. BRE noted that Point2 had made some adjustments per BRE guidance, to allow for “balconies”, but even so the reductions in VSC remained “*well outside BRE guidelines*” at 40-48% based on Point2’s calculations which BRE did not check. Nor did BRE visit the sites which would have shown that the “balconies” were not “balconies” but fire-escapes which admitted light to the rooms.
 - iii. BRE criticised Point2’s methodology of referring to a target area which was particularly conducive to producing a more favourable analysis for the developer and was insistent that “*The new development would result in large non-daylit areas on the first and second floors within these flats.... This would count as a major adverse impact.*”.
 - iv. While the proposed development was much revised to take account of these and other concerns, resulting in a lower impact, the historical submissions and reviews are cited here to demonstrate that Point2 has a track record of (a) overlooking matters which are inconvenient to its client’s plans (e.g. major adverse impacts) and (b) choosing to apply questionable methodologies to create data which suits their arguments (in the two reviews so far, BRE gently suggested that the reference point for alternative target values was inappropriate, but Point2 did not address this criticism)
- c. BRE was tasked to prepare a review of the revised D&S report and submitted this in January, 2020 in light of changes to the height and mass of the proposed development as reflected in a revised application which was filed in November, 2019. BRE again reviewed the work of Point2, strengthening the language employed to criticise Point2’s methodology in relation to the same matter already highlighted in BRE’s two previous reviews of Point2’s work.
 - i. “*Point2 have sought to determine alternative target values for daylight and sunlight. While the principle behind this is endorsed by the BRE Report, Point2’s choice of comparable area is dubious.*”
 - ii. BRE concluded that the loss of light to the buildings on the southern side of Charterhouse Square would count as “*a moderate to major adverse impact*”
- d. After further revisions to the proposed development scheme, BRE was tasked to prepare a further review of the further revised D&S report dated July, 2020 in a report which BRE submitted in October 2020. This final revised D&A Assessment is the one available on the City of London Planning Portal.
 - i. BRE reiterated the criticism of Point2’s methodology in seeking an alternative target value, repeating the statement “*Point2’s choice of comparable area is dubious*” in reference to Point2’s discussion of same in section 6 of the final report.

- ii. Point2 considered all those windows which it attributed to the school as well as all those windows it attributed to residential occupation in 41-43 Charterhouse Square, and we focus on the latter here, since we are better able to cross-check the accuracy of those assessments.
- iii. In the case of every one of 68 windows assessed on the south side of Charterhouse Square, including 35 in No 12 Carthusian Court, Point2 found only one to be problematic. This window was in Carthusian Court. All other windows assessed were “considered acceptable” by Point2.
- iv. BRE on the other hand noted that one window in 39 Charterhouse Square was marginally outside BRE guidelines and that “*In number 40, loss of vertical sky component would be outside the BRE guidelines for three of the windows analysed, but only marginally. However, there would also be a significant impact on daylight distribution to four of the six rooms analysed. Daylight provision is particularly important for young children, and the negative impact will depend on what the use of the rooms is and whether the children will be in them all day. In the absence of further information, a minor adverse impact is suggested; the results are better than for the previous scheme.*”
- v. With respect to 41-43 Charterhouse Square, BRE concluded “*Except on the top floor of number 43, and a small number of secondary windows that do not directly face the proposal site, all the windows on this side, would have a loss of light outside the BRE guidelines. Windows on the main façade would have relative reductions in vertical sky component of between 20-40%, with residual VSCs down to 7-15% for those windows with balconies or fire escape stairs above them. Daylight distribution would also be adversely affected in some of these rooms, with three rooms in 42 Charterhouse Square losing over a third of their daylight area...
In summary, these dwellings are likely to be well daylighted currently, but the new development would result in their being significantly less well daylighted on this side of the building. This would count as a moderate adverse impact.*”
- vi. With respect to 12 Carthusian Court, BRE shows that it only reviewed the data provided to it by Point2, stating “*It appears that the lower four floors of this building are offices. Only the top three floors are residential. ...But concluding “Four of the rooms would have a significant adverse effect on their daylight distribution. However, the losses of light are not far below the guidelines, and therefore this would be classed as a minor adverse impact.”*”
- vii. In summary, where Point2 found one minor issue, BRE, on reviewing the data provided by Point2 and without conducting any on the ground assessment in its own right, concluded that: (a) the loss of daylight and sunlight to the school rooms merited special attention and (b) that virtually every window at 41-43 Charterhouse Square would suffer loss of light outside BRE guidelines. It is important to note that this was based on Point2’s surveying and not independent surveying.
- e. Given the bias in the analysis revealed by BRE, we assume that there would be merit in thoroughly checking the base data. And, if there’s a perceived need to check the basic data as well as the analysis of same, then there is clearly a need for a fully independent survey which really should have been commissioned in the case of 18/01020/FULMAJ. The point of this review of the D&S Assessment submitted with 18/01020/FULMAJ and BRE’s four examinations of same, is that 23/ 01417/ FULMAJ provides an opportunity to address this problem at the outset and commission an

independent report so that all stakeholders may have confidence in the results. It also enjoins all stakeholders to read the D&S Assessment submitted in connection with 23/ 01417/ FULMAJ with no small measure of suspicion.

i. For example, BRE's review of Point2's methodology described above (3.d.i) concluded it was "*dubious*" on two occasions. It seems that the focus of this criticism was section 6.4 in 18/ 01020/ FULMAJ as follows:

1. *To establish a suitable alternative target value for VSC we have considered the levels of daylight that are generally enjoyed in the immediate area. We understand that the area immediately to the south of the site is predominantly of residential use and we have therefore run assessments to the area within the red line shown below, the results of which are shown in Figure 4.*

which even the layman can tell is strangely similar to section 6.4 in the D&S Assessment submitted in connection with 23/ 01417/ FULMAJ , as follows:

To establish a suitable alternative target value for VSC we have considered the levels of daylight that are generally enjoyed in the immediate area. We understand that the area immediately to the south of the site is predominantly of residential use and we have therefore run assessments to the area within the red line shown below, the results of which are shown in Figure 4.

2. It seems safe to conclude that yet another review of this paragraph will lead to similar conclusions as to the nature of the methodology.

(4) I personally submitted an objection referencing the D&S Assessment only on 22nd February 2024, which solely addressed the concerns of Flat 6, 42 Charterhouse Square, but since then I have had the opportunity to consult with my neighbours to produce a more extensive and better set of images, which illustrate the loss of light from the proposal 23/ 01417/ FULMAJ .

In each of the following illustrations we endeavour to show (1) the status quo, and (2) the impact of the proposed scheme, if by a slightly different methodology in each case.

- a. Ground Floor 41 Charterhouse Square Office Apartment (not considered relevant by Point2) – Current



- b. Consented



c. Proposed



The above images clearly show that the proposed development represents a major further encroachment on the available daylight and sunlight to the rear windows of this property, which was not part of Point2's analysis.

d. 3rd Floor 42 Charterhouse Square (Point2 window reference W30/403) current with proposed development overlaid on panoramic photo of current outlook.



The above superimposition of the north elevation of the proposed scheme on this existing view from the central window W30/ 403 clearly shows that direct light is blocked almost entirely from the main

lower part of the window by the extent of the newly proposed development. When the owner/developer applies for a similarly large structure to be constructed on the site of 9-12 Long Lane the direct light through the main lower window will be obliterated completely.

e. 1st Floor, 42 Charterhouse Square (Point2 references W27/401)



This third illustration demonstrates the extreme loss of direct daylight to this window which results from the northern elevation of the proposed development being brought so far north compared with the consented plan which had that development well stepped back at the higher levels. As one may observe, there is total loss of the VSC to this window.

Unsurprisingly, Point2 concludes “*Overall it has been shown that whilst some daylight effects are beyond the BRE guidelines, the rooms will retain a good level of daylight for an urban area..We are therefore of the opinion that the effects of the Proposed Development can be considered acceptable*” in line with its “opinion” with respect to nearly every other window considered in its study.

In conclusion,

- (1) Given the concerns raised by the D&S Assessments submitted by Point2 in support of applications 18/ 01020/ FULMAJ and now 23/ 01417/ FULMAJ , it is challenging for independent stakeholders to have any faith in Point2’s (a) basic data (b) their methodologies - which were criticised as “dubious” in the past - or (c) their conclusions.
- (2) It is critical that all parties start from the same basis in this matter. Rather than accepting and then reviewing the desktop analysis from Point2, City of London Planning should insist on the appointment of a verifiably independent surveyor to conduct a verifiably independent D&S Assessment which is beyond reproach. It would be ideal, if this independent D&S Assessment could take advantage of the willingness of those affected by the proposed development to provide access to their properties so that the windows affected could be analysed from that perspective. This perspective is clearly much valued, otherwise Point2 would not go to such lengths to misrepresent the extent to which they’ve had access to same.

- (3) The fact that several of the most affected buildings are the premises of a primary school, something which Point2 has chosen to dispute in its report, makes this matter all the more urgent since as BRE stated in its reviews “*Daylight provision is particularly important for young children, and the negative impact will depend on what the use of the rooms is and whether the children will be in them all day.*”
- (4) The detrimental effects of the probable extent of the loss of daylight and sunlight to primary school children, suggests the need to ensure that the D&S Assessment is of the highest standard and that all parties should be able to rely on such a report for any deliberations on the merits of application 23/ 01417/ FULMAJ .
- (5) As noted already in a comment of 22rd February with respect to certain windows only , for which data comparisons were easily made, and according to Point2’s own (suspect ?) data, the proposed scheme 23/ 01417/ FULMAJ would create a negative differential in comparison with the much larger scheme proposed under 18/ 01020/ FULMAJ with respect to (1) Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH), although there is a marginal improvement in terms of No Sky Line (NSL).
- (6) This raises the critical issue that a development, which would have been prohibited if proposed as a single scheme, is open to developers through filing for multiple applications for different parts of the same site, even though the cumulative impact on D&S of nearby properties is adversely affected well beyond the BRE guidelines. In other words, without contractual undertakings restricting the development of 9-12 Long Lane the prohibited combined loss of amenity rests only on a future application. Evidence to support this is reproduced in Annex 1 below.
- (7) Given that the developer is now happy to represent that the consented scheme will never be built ([Financial Viability Report April,2024](#) p,5), we question whether any representations which cite the precedent of 18/ 01020/ FULMAJ are valid.

Yours sincerely,

Neal Birnie	Claudia Janesenwillen	Peta Turvey
Miranda Fulleylove	Kirstin Kaszubowska	Shane Walter
Casimir Fulleylove-Golob	Stefan Kaszubowski	Sophie Walter
Ralph Fiennes	Ian Logan	Jane Wentworth
Peter Golob	Robyn Minshall	Richard Wentworth

Sent by: Peter Golob, Flat 6, 42 Charterhouse Square, London EC1M 6EA

Annex 1

The below data shows that in most cases, all the daylight and sunlight loss of the previously analysed scheme is taken by the current proposed scheme, even making allowance for the future development of 9-12 Long Lane, in a manner which is wholly unrealistic . Since any development of 9-12 Long Lane would follow the proposed development 23/ 01417/ FULMAJ in time and take advantage of the new height and mass levels established in 23/ 01417/ FULMAJ , the impact would never be as modelled by Point2 but much more severe. Point2 notes that its basis for comparison “*is not a real proposal*” but gives no indication as to why it assumed that a future development of 9-

12 Long Lane would undertake the same stepping back as the Consented Scheme, when approval has been assumed for 23/ 01417/ FULMAJ with its much reduced stepping back.

If 23/ 01417/ FULMAJ is approved, then the developers of 9-12 Long Lane will build to the increased height and mass of 23/ 01417/ FULMAJ . This should be analysed but it has not been.

1-8 Long Lane Comparison of Daylight Impact of 18-01020-FULMAJ vs. 23-01417-FULMAJ on Flat 6 42 Charterhouse Square													
Point 2 Ref	2020.07			2023.12			2020.07			2023.12			
Room	Window	Existing VSC	Delta	Proposed VSC	Delta	Loss	Delta	% Loss	Delta	2020.07	2023.12	Delta	
R1 403	W1 403	7.08	7.08	0.00	5.07	5.07	0.00	2.01	2.01	0.00	28.4%	28.4%	0.0%
R2 403	W2 403	2.82	2.82	0.00	2.75	2.73	-0.02	0.07	0.09	0.02	2.5%	3.2%	0.7%
R2 403	W30 403	31.27	31.27	0.00	24.63	24.67	0.04	6.64	6.60	-0.04	21.2%	21.1%	-0.1%
R3 403	W29 403	31.48	31.49	0.01	24.78	25.23	0.45	6.70	6.26	-0.44	21.3%	19.9%	-1.4%
R1 18	W1 18	12.24	12.24	0.00	7.31	6.42	-0.89	4.93	5.82	0.89	40.3%	47.5%	7.3%
NSL													
		2020.07			2023.12			2020.07			2023.12		
		Existing Sq. ft	Delta	Proposed Sq. ft	Delta	Loss	Delta	% Loss	Delta	2020.07	2023.12	Delta	
R1 403	W1 403	96.5	96.5	0.0	96.5	96.5	0.0	0	0	0.0	0%	0%	0%
R2 403	W2 403	197.2	197.2	0.0	124.1	126.2	2.1	73.1	71	-2.1	37%	36%	-1%
R3 403	W29 403	86.0	86.0	0.0	86.0	86.0	0.0	0	0	0.0	0%	0%	0%
R1 18	W1 18	180.4	180.4	0.0	170.9	174.8	3.9	9.5	5.6	-3.9	5%	3%	-2%
ASHP													
		2020.07			2023.12			2020.07			2023.12		
		Existing Winter	Delta	Existing Annual	Delta	Proposed Winter	Delta	Proposed Annual	Delta	2020.07	2023.12	Delta	
R1 403	W1 403	4	4	0.0	19	19	0.0	0	0	0.0	15	15	0.0
R2 403	W2 403	1	1	0.0	3	3	0.0	1	1	0.0	3	3	0.0
R2 403	W30 403	23	23	0.0	74	74	0.0	12	11	-1.0	63	62	-1.0
R3 403	W29 403	22	22	0.0	74	74	0.0	13	12	-1.0	65	64	-1.0
R1 18	W1 18	15	15	0.0	36	36	0.0	6	2	-4.0	27	23	-4.0
ASHP													
		2020.07			2023.12			2020.07			2023.12		
		Proposed Winter Loss	Delta	Proposed Annual Loss	Delta	Proposed Winter Loss %	Delta	Proposed Annual Loss %	Delta	2020.07	2023.12	Delta	
		-4	-4	0.0	-4	-4	0.0	-100%	-100%	0%	-21%	-21%	0%
		0	0	0.0	0	0	0.0	0%	0%	0%	0%	0%	0%
		-11	-12	-1.0	-11	-12	-1.0	-48%	-52%	-4%	-15%	-16%	-1%
		-9	-10	-1.0	-9	-10	-1.0	-41%	-45%	-5%	-12%	-14%	-1%
		-9	-13	-4.0	-9	-13	-4.0	-60%	-87%	-27%	-25%	-36%	-11%

Peter Golob
42 Charterhouse Square
London EC1M 6EA
8th May, 2024

For the attention of:
Anna Tastsoglou Planning Officer
Thomas Roberts MRTPI | Planning Officer (Design)
Urban Design & Conservation | Planning Division | Environment Department
City of London Corporation | Guildhall | London EC2V 7HH

Comment and Objection in relation to 23/ 01417/ FULMAJ with specific reference to
DAYLIGHT/SUNLIGHT ADDENDUM REPORT

Dear Anna and Thomas -

This comment and objection concerns the Addendum to Daylight & Sunlight Assessment prepared by Point 2 dated 25th April, 2024, which attempts to address many of the issues raised in my letter to you of 21st February 2024.

I should note two points at the outset:

- (1) The Addendum does not address the subsequent Comment and Objection filed by me on behalf of a large number of residents of the South Side of Charterhouse Square dated 21st April
- (2) All submissions I have made personally or on behalf of others should be classified as "Comments and Objections" but for some reason the Public Comments Tab on your website records my comments as "Neutral". I hope this mis-categorisation does not contribute to any confusion as to the nature of the Objections.

Turning to the Daylight and Sunlight Addendum Report, I've aimed to keep comments brief, so that you're not hosting an entire written record of addenda submitted by Point2 with my comments pointing out errors and defects.

- (1) With respect to 38-40 Charterhouse Square, it is gratifying to note that Point2 now "*understand that this property is no longer a mixed-use building as set out in our Submitted Report but used solely a school*" some 4 years after the fact. I hope it will not take another 4 years for Point2 to accord the rest of the buildings belonging to the school a similar status. The fact that after multiple submissions over the past 5 years and two submissions in the past 6 months, Point2 is still accounting for only ~60% of the school building, demonstrates the inadequacy of the exercise which Point2 has carried out. The Assessment gives the appearance of relying on site visits (see below) but the Addendum confirms that no one from Point2 has bothered to visit even the reception area of the school.

This seems careless and forces the reader of the Addendum to consider what other

misrepresentations have resulted from such an approach. It should be recalled that in relation to 18/ 01020/ FULMAJ, Point2 had to be corrected with respect to the categorisation of 41-43 Charterhouse Square as “commercial”. These are serious errors, and the fact that Point2 seems to rely on others to discover where the errors are to be found, does not promote faith in the Assessment or its findings

- (2) The Daylight and Sunlight Assessment of December 2023 argues (1.13) that comparison with a wholly unrealistic scenario (that 9-12 Long Lane is developed as per the plan consented as 18/ 01020/ FULMAJ) could take place alongside the proposed scheme “*and overall, the impact on the surrounding neighbours is the same as the Consented Scheme*”. However, in the Addendum, the authors present no such evidence that this is the case with respect to the majority of the school buildings, which is directly in the shadow of any combined development. Why is the school treated differently ?

Turning now to the Addendum comments on the submission I made in my Comments and Objection of 21st February:

- (3) I note that the authors, having previously stated that they had access to Flat 6, but not to one half of it (giving the impression that they were unaware that the two flats had been conjoined some 20 years previously), now state that they *did* have access to all of it, but did not use the site notes which refer to half of it, but that this doesn’t make any difference because they would conclude the same, regardless of whether they or not they had visited the flat. I think I’ve got that right and I suppose that is all possible, though it does beg the question of how much value the authors place on site visits and real observations, versus desktop exercises. It leads to the impression that the answer to this may be “not enough”.
- (4) I had pointed out that the December Assessment decided that fire-escapes were “balconies” and that the authors of the Assessment felt it was reasonable to include an analysis with and without “balconies”. To the layman, it seems a bit odd to imagine alternative facts and to conduct an analysis based on them, since the fire-escapes certainly exist and cannot be removed. They are not optional; they are not amenities affording residents use of outside space, nor do they have solid floors. I suppose this again shows a preference for the ease of desktop exercises and convenient modelling (perhaps the software used does not allow for assessment semi-translucent structures ?) as opposed to actual data from site visits.
- (5) With respect to “Impacts from Proposed Development compared to the Consented Scheme”, it has since been confirmed that the Consented Scheme will not be built, and that 9-12 Long Lane will not be redeveloped per the Consented Plan (1-8, Long Lane, EC1A 9HF Financial Viability Review passim and p.5 - [FINANCIAL VIABILITY REVIEW](#)). In this context, Point2’s comment that “*Whilst some areas of the Proposed Massing are higher/set further forward than the consented, other parts are lower/set further back.*” is disingenuous with respect to the Daylight and Sunlight impact on the buildings to the south of the development site.

The authors will be aware that any elements of the proposed development which are lower / set further back (to be honest, I cannot find any) are on the northern side of the building, with the applicant admitting that there is increased massing on the northern

side of the proposed development site, creating a more severe impact on any building in the shadow of the proposed development site to the south.

In addition, if the Consented Scheme will not be built, why should it be seen as a precedent for anything? Finally, if the proposed development is allowed to proceed, will it not set new datum levels for height and mass when the owners of 9-12 Long Lane submit their development proposals? Why would the developers of 9-12 Long Lane rest their application on a scheme which has not been built, when they can refer to a scheme which has been built? Even a desktop exercise should at the very least consider the impact as if the entirety of 1-12 Long Lane would be built to the height, mass, and cross section precedents set by the proposed development of 1-8 Long Lane.

In any case, the authors state *“If we were to not include the western end of the consented scheme in this analysis the results would show a lot more gains when compared to the consented scheme which would be unrepresentative.”* I suppose we should assume from this comment that the authors consider their own submissions with respect to the windows of the school which they have analysed, to be “unrepresentative” (c.f. 2 above).

Turning to the final section of the addendum dealing with “Assessment Results for the Proposed Layouts to Flat 6, 42 Charterhouse Square”:

- (6) Paragraph 2.20: The VSC for the window which Point2 identifies as W1/18, shows a modelled reduction of 48% which is well outside BRE guidelines, but Point2 refers to a set of “alternative facts” as if the fire-escapes could be removed, and thereby the window retains a level of daylight which *“is considered good for an urban area and exceeds the commensurate target values we have established for the local area.”* It would take up too much space to comment on the logical contortions required to reach this – and similar conclusions – with respect to every window, but it is enough to say with respect to this instance that (a) we need to imagine that the fire-escapes do not exist, in order to have a reduction which remotely approximates something BRE guidelines might countenance and that (b) we then have to accept that the *“values we have established for the local area”* are valid, despite being criticised by BRE from 2018 onwards as “dubious”. If the fire escapes cannot be removed and if the values used for comparison with the local area are unreliable, it would seem that any conclusions are unrealistic as well as unreliable.

Similar logical contortions can be detected in each Addendum paragraphs 2.21-2.27, and I would be happy to elaborate if asked to do so. Needless to say, in every case Point2 concludes – Candide like - that the result of whatever development takes place, there is a “good level of daylight / sunlight”. It makes the layman wonder what the purpose of BRE guidelines are, if they can be ignored in such an obvious way.

- (7) The owners of Flat 6 have been forced to take a view on the possible development of this site and have concluded that to preserve certainty of adequate daylight and sunlight to living areas, it is necessary to open up more space to the sky on the southern end of the premises. These are mitigating actions, anticipating the negative impact of the proposed development on this property, which will enjoy no compensating benefits.

Not every resident of the south side of Charterhouse Square lives on the top floor and not every resident is in a position to sacrifice living space in this way to preserve adequate (and indeed recommended levels) of daylight and sunlight. Those of my neighbours who live on lower floors will suffer a more extreme effect of the proposed development without any similar scope for mitigation.

I would be prepared to add to the criticism of Point2's addendum, however, the above should suffice to call into question the accuracy of the analysis presented, as well as the validity of the opinions offered.

Point2 admits to working from plans and data which are out of date with respect to the properties considered in the Addendum. Its willingness to utilise old plans, as opposed to site visits, raises serious questions with respect to the accuracy of any of the base data for all the buildings considered in its Assessment. Furthermore, Point2 has been content to submit erroneous data and analysis until the errors are pointed out. We cannot be sure how many errors have not been pointed out until there is a fully independent Daylight and Sunlight Assessment.

The entire addendum reiterates the futility of the sort of desktop exercise which Point2 has carried out. For anyone to have confidence in the D&S Assessment, it is imperative that a fully independent report is commissioned and, in particular, one that is based on access to affected windows rather than a desktop exercise conducted solely from the perspective of the developer and the prospective development.

For the avoidance of doubt, please consider this an objection based on the inadequacy of the D&S Assessment and the Addendum's futile attempt at exculpation.

Yours Sincerely –

Peter Golob

Peter Golob
42 Charterhouse Square
London EC1M 6EA
19th May, 2024

For the attention of:

Anna Tastsoglou Planning Officer
Thomas Roberts MRTPI | Planning Officer (Design)
Urban Design & Conservation | Planning Division | Environment Department
City of London Corporation | Guildhall | London EC2V 7HH

Comment and Objection in relation to 23/ 01417/ FULMAJ with specific reference to –
RESPONSE TO OBJECTIONS submitted by Point 2 dated 8th May, 2024

Dear Anna and Thomas -

This comment and objection concerns the Comment submitted by Point 2 dated 8th May, 2024, which attempts to address some of the issues raised in my letter to you on behalf of many residents of Charterhouse Square dated 21st April, 2024.

I remain reasonably convinced City of London Planning has no wish to host an entire written record of comments on comments but some of the matters raised by Point2 in their letter of 8th May do demand a further response.

- (1) In Comment (2) Point2 states “*For clarity, any additional windows which are located further away from the Site (i.e within to 33-37 Charterhouse Square) will only experience smaller reductions than those assessed and will therefore also experience effects that are within the BRE guidelines criteria.*” So as of 8th May, having been told that the entirety of 33-40 Charterhouse Square is a School, but only conducted a desk-top analysis of 38-40 Charterhouse Square, Point 2 concludes that the rest of the School need not be analysed because the development will have no meaningful impact. This of course, contrasts with the statement in the original submission of December, 2023 when of 33-37 Charterhouse Square were excluded from consideration because they were deemed to be offices (*c.f. 5.3 All other surrounding properties are therefore considered to be of commercial use which does not have a reasonable expectation of daylight or sunlight.*). It does not inspire confidence in its more detailed analysis, that Point2 can quickly reach such a conclusion with no analysis whatsoever.
- (2) It is impossible not to admire the irony that Comment (1), being an admission that the report is largely based on analysis from 2018 or earlier “*because it is still relevant*”, is followed swiftly by Comment (2) that the authors of the report have “*recently been made aware that parts of 40 Charterhouse Square, which were previously understood to be an office, are now part of the School*”, which information was contained in the Comment and Objection they refer to. I suppose it is an economic approach to maintain

everything should be considered up-to-date and fit for purpose unless or until someone points out how much things have changed over the past 5-6 years. However, to the layman, it does not seem entirely professional, and gives emphasis to the concerns already expressed regarding what “issues” have been left outstanding by excessive reliance of this method of discovering what is no longer relevant.

- (3) With respect to Comment (3), it is concerning to see Point2 treat the Building Research Establishment’s guidelines as opinions which can and should be differed with, when they run contrary to the interests of the developers or the authors of the report. Again, to the layman, BRE guidelines should carry more weight than the opinions of interested parties, even if the conclusions are inconvenient to the arguments made by Point2.
- (4) With respect to Comment (4), in the letter of 21st April, we did not present the images referred to in Comment 4 as accurate but as illustrations to show the impact of the development on some of the affected windows. I think we should all be pleased that Point 2 concur that the extent of the impact is not captured by the desktop exercise carried out to date (the tests), and their pursuit solely of a qualitative assessment via computer modelling is unsatisfactory from the victim’s perspective, even if that is all that their basic brief demands. Too great a difference between “quantitative” measurements against “adjusted” or “normalised” expected measurements and actual visual impact indicates that more emphasis does indeed need to be given to actual visual impact. Point 2 state “*We have carried out quantitative assessments that can be considered against the guidance set out in the BRE guidelines including our alternative target value assessment*”, though BRE has called this approach “dubious” leading to the difference of opinion in (3) above, where Point 2 essentially ignores BRE criticisms.
- (5) Finally, the developers have admitted that the Consented Scheme will not be built - rather than may not be built. Therefore, it can have no more status as a “precedent” than any other scheme which was not built. The danger for all affected parties is that the footprint for the Consented Scheme is split into two or more parts with each riding on the “precedent” of a more recent application to exceed the overall impact of what was consented and potentially even what was refused, so the cumulative effect is significantly more detrimental than originally contemplated. Unless all parties to the original scheme give binding undertakings to the contrary, there is a distinct risk that the gains aimed for by the developers of 1-8 Long Lane become the new baseline for gains aimed for by the developers of 9-12 Long Lane. Therefore, the impact should be assessed as if 9-12 Long Lane is developed not as consented but as per the base line set by 1-8 Long Lane as Proposed.

Yours Sincerely –

Peter Golob