

Committee:	Date:
Planning and Transportation	14 October 2014
Subject: 75 Carter Lane London EC4V 5EP Formation of a residential sub-basement (57sq.m).	
Ward: Farringdon Within	Public For Decision
Registered No: 14/00329/FULL	Registered on: 8 April 2014
Conservation Area: St Paul's Cathedral	Listed Building: No
<p><u>Summary</u></p> <p>The application relates to a non-listed, mid-terrace, former warehouse building on the south side of Carter Lane. The building is in the process of being converted into a single residential dwelling with an extension at roof level. Planning permission has been granted for these works.</p> <p>Planning permission is sought for the formation of an additional basement (57sq.m). The proposed sub-basement would be located directly below the existing basement. The excavation depth would be approximately 3.5 metres. The basement would be mechanically ventilated and used as a bedroom and for storage.</p> <p>Objections have been received to the scheme. The primary concerns relate to the impact of the works on the structure of adjoining buildings, noise and dust from construction work, the impact of the basement on the conservation area, the archaeological implications of the works, the lack of natural ventilation to the basement and whether appropriate fire escape arrangements can be accommodated within the proposal.</p> <p>There would be no external manifestation of the basement works above ground floor level. The proposal would not harm the significance of the application property or the churchyard of St Anne Blackfriars and its mature tree of heaven to the south of the site as non-designated heritage assets, or the significance of the St Paul's Cathedral Conservation area as a designated heritage asset.</p> <p>The applicant has submitted structural details and details of archaeological evaluation and ground investigation works that have been carried out to date. The information demonstrates that it would be feasible to construct a basement on the site. Outside planning, building control and associated regulations would control matters relating to engineering design and structural stability and the Party Wall Act controls development either side of the party wall.</p> <p>The permission would be subject to conditions requiring a scheme for protecting</p>	

neighbouring occupiers from the impacts of construction and a construction logistics plan.

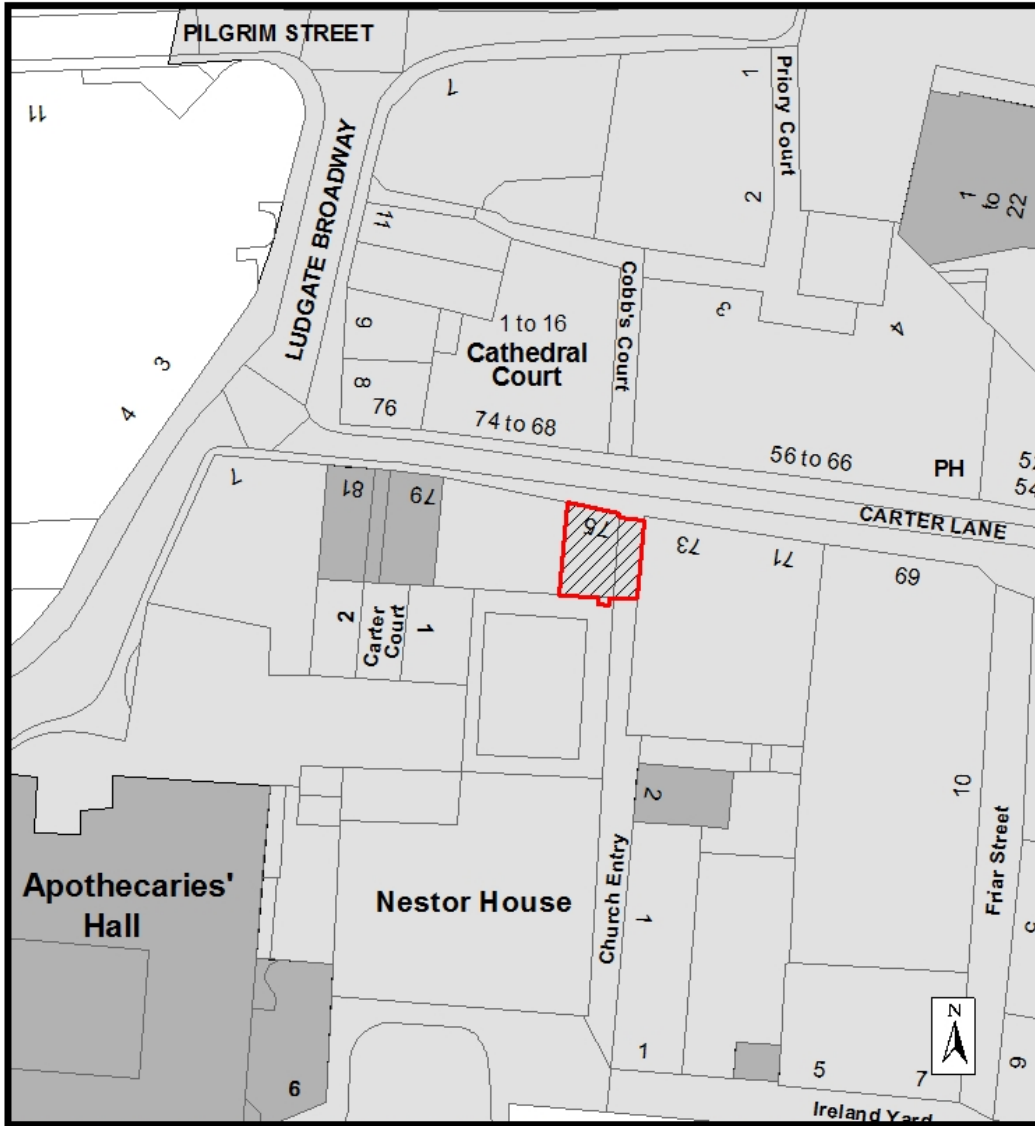
The applicant has demonstrated that fire escape and ventilation arrangements have been considered.

Archaeological evaluation has been carried out. A programme of archaeological work would be required by condition.

Recommendation

That planning permission be granted for the proposal in accordance with the attached schedule.

Site Location Plan



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ADDRESS:
75 Carter Lane

CASE No.
14/00329/FULL

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



75 Carter Lane: View from Carter Lane looking west

Site

1. The application site is located on the south side of Carter Lane. It comprises a non-listed former warehouse that dates from the 19th century. The building has stock brick elevations with a combination of gothic and industrial features. Access to Church Entry is incorporated into the building at ground floor level.
2. The building is in the process of being converted to a single residential dwelling (Use Class C3) and extended at roof level. The site was in office use (Class B1) prior to the conversion.
3. There are no listed buildings in the immediate vicinity of the site. The site is within the St Paul's Cathedral Conservation Area and partly within the St Paul's Depths Area. The southern boundary of the site abuts the churchyard of St Anne Blackfriars which is landscaped and contains a mature Tree of Heaven.

Planning History

4. An application for planning permission (ref. 10/00652/FULL) was approved on the 4th November 2010 for the conversion of the office building (Use Class B1) to four flats (Use Class C3), including alterations to the Church Entry elevation to accommodate a refuse storage chamber. Surrounding residential occupiers were consulted on the application between the 13th September 2010 and the 4th October 2010. No objections were raised.
5. An application for planning permission (ref. 11/00547/FULL) was approved on the 15th December 2011 for the conversion of the office building (Use Class B1) to a single dwelling (Use Class C3). Associated external alterations were approved including a new roof extension and terrace, the formation of a refuse chamber and new windows. Surrounding residential occupiers were consulted on the application between the 18th August 2011 and the 8th September 2011. No objections were raised.
6. An application for planning permission was approved on the 17th January 2013 (ref. 12/01105/FULL) for the conversion of the office building (Use Class B1) to a single dwelling (Class C3). The associated external alterations were as above but included further new windows and the insertion of three vents. Surrounding residential occupiers were consulted on the application between the 27th November 2012 and the 18th December 2012. No objections were raised.

Proposal

7. Planning permission is sought to extend the property through the formation of a sub-basement (57sq.m). The sub-basement would occupy the same footprint as the existing basement. An excavation depth of approximately 3.5 metres is proposed. Part of the basement would be located below Church Entry which is public highway.
8. The new floorspace would be used as a storage area and bedroom. It would be mechanically ventilated.

Consultations

9. The application has been publicised on site and in the press. Two rounds of resident consultation have been carried out.
10. The first resident consultation was carried out on the 22nd April 2014 running until the 13th May 2014. The initial application submission included the basement works and development consented and implemented under application reference 12/01105/FULL. The applicant subsequently withdrew the consented elements from the proposal.
11. The second round of consultation was carried out on the 19th August 2014 running until the 9th September 2014. Residents were advised of the amended content of the application and that additional information had been submitted in respect of the basement works.
12. 10 letters of objection have been received in response to the first round of consultation and four letters of objection have been received in response to the second round of consultation (three letters were follow up comments to the first round of consultation and one letter was an additional representation). The concerns over the sub-basement works are summarised as follows:
 - The basement could affect the structure and stability of 77 Carter Lane. The application does not provide for a strategy as to how any cracking in the party wall would be addressed. A structural methodology should be submitted.
 - The basement would not have light, ventilation or a protected fire escape route.
 - How would spoil be removed? Construction work would be noisy, disruptive and cause an increase in dust. Carter Lane is a trap for noise. Construction projects have recently taken place in the locality and disturbed residents. A Construction Management Plan should be required.
 - Any ventilation equipment required in association with the basement should not be noisy. Additional vents would be unacceptable.
 - The proposal would cause an increase in vermin in the local area.
 - The proposal would have archaeological implications and could cause damage to remains. A watching brief should be required.
 - The basement would have an undue impact on the conservation area.
 - The application should be refused. The building should be limited to one basement. Such a policy is applied in other London Boroughs such as Kensington and Chelsea.
 - The construction of an unnecessary basement would produce CO2 which is not sustainable.

13. The City of London Conservation Area Advisory Committee raised no objections to the proposal.
14. The site is partially within the St Paul's depths area designed to protect the foundations of the Cathedral. The Dean and Chapter of the Cathedral and the Surveyor to the Fabric of the Cathedral have been consulted on the application and raise no objection to the works. Alan Baxter Associates have confirmed on the Dean and Surveyor's behalf that the site is just outside of the boundary line determining the area covered by the St Paul's Cathedral Preservation Act 1935 whilst the north and east walls, which are to be underpinned, are on the actual boundary. Notwithstanding, the proposed depth of underpinning would not penetrate below the level specified within the Act.

Policies

15. The development plan consists of the London Plan, the saved policies of the Unitary Development Plan and the Core strategy. The London Plan, UDP and Core Strategy policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
16. The draft Local Plan was published in December 2013 and is expected to be adopted in late 2014 or early 2015. Although it does not carry the full weight of an adopted plan, it is considered that the plan should carry significant weight as it is at the final stage of pre-submission consultation, prior to formal consideration at public examination. In accordance with the NPPF and Local Plan Regulations, the draft Plan has been considered by the Court of Common Council as sound planning policy for submission to the Secretary of State.
17. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Considerations

18. The Corporation, in determining the planning application has the following main statutory duties to perform:-
 - To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations so far as material to the application, and to any other material considerations (Section 70 (2) Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004);
 - When considering the applications special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
19. Chapter 12 of the NPPF sets out key policy considerations for applications relating to designated and non-designated heritage assets.

Other relevant guidance on heritage assets and the setting of heritage assets is provided by English Heritage including the documents Conservation Principles, Policies and Guidance, The Setting of Heritage Assets, Building in Context (EH/CABE) and the PPS5 Practice Guide.

20. In respect of sustainable development the NPPF states at paragraph 14 that 'at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision taking... for decision taking this means: approving development proposals that accord with the development plan without delay.'
21. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
22. The principal issues in considering this planning application are:
 - The extent to which the proposals comply with the relevant policies of the London Plan, Core Strategy and saved policies of the UDP.
 - The extent to which the proposals comply with Government policy advice (NPPF).
 - The impact of the proposal on the significance of designated and non-designated heritage assets.
 - The impact of the application on archaeological remains and a mature tree of heaven to the rear of the site.
 - The impact of the proposal on Church Entry as public highway.
 - The impact of the proposal on residential amenity.

Acceptability of the Basement Works

Heritage Considerations

23. The heritage assets that are relevant to the consideration of this case are the application property (non-designated asset), the churchyard of St Anne Blackfriars and its mature tree of heaven (non-designated asset) and the St Paul's Cathedral Conservation Area (designated asset).
24. The proposal has been assessed in terms of its impact on the significance of these assets in accordance with paragraph 129 of the NPPF and English Heritage guidance.
25. The application property and the churchyard of St Anne Blackfriars are of evidential and historic significance. They provide the opportunity to yield some understanding of past activity in the area. The exterior of the application property maintains the appearance of a 19th Century warehouse. The churchyard provides reference to the site of St Anne's Church.

26. The St Paul's Cathedral Conservation Area is of historic, evidential, communal and aesthetic significance as it encompasses St Paul's Cathedral and its setting.
27. There would be no external manifestation of the basement works above ground level. The works would be located directly below the footprint of the existing building. As such it is not considered that they would harm the significance of the application property, the churchyard or the St Paul's Cathedral Conservation Area.

Structural Considerations

28. The application site adjoins 77 Carter Lane. The residential occupiers of number 77 are concerned that the proposed works would affect the structural integrity of their building and the party wall.
29. The assessment of this application must focus on matters relevant to planning and should not duplicate other regimes. Building Control and associated Regulations control matters relating to engineering design and structural stability to ensure that the works would be constructed and used safely.
30. The Party Wall Act controls development either side of the party wall to ensure that it maintains its integrity and function to protect neighbouring interests. The Act is a private matter between neighbours.
31. Approval in Principle would be required from the City's highway team in order to carry out the works below Church Entry. The City's engineers would assess the works in order to safeguard the stability of the public highway.
32. Notwithstanding the above, paragraph 121 of the NPPF states that planning policies and decisions should ensure that a site is suitable for its new use taking account of ground conditions and land instability. Adequate site investigation information, prepared by a competent person, should be provided to demonstrate that these impacts have been understood.
33. At the request of the Local Planning Authority the applicant has provided structural drawings, structural calculations and a structural methodology statement. The statement concludes that the site is not within flood zones 2 or 3 as defined by the Environment Agency. Based on environmental data the ground water level would not be affected by the depth of the proposed basement. Three trial pits have been dug in the existing basement in order to assess the below ground conditions.
34. It is proposed that a method of reinforced concrete underpinning would be used to construct the basement. This approach has been signified as being sound in principle for this site by a structural engineer (Philip Deane BE CEng MStructE MICE MIEI from Ellis & Moore Consulting Engineers). It is likely that the underpinning would be completed around the perimeter walls with the central soil mass left intact prior to being removed.
35. The submitted information indicates that a subterranean development could be constructed at 75 Carter Lane taking into account the site,

existing structural conditions, geology and the requirements of current building regulations. The structural details would not form part of the documentation approved under this application as the methodologies may change subject to further ground investigation, but would need to incorporate the programme of archaeological recording and excavation.

Construction Impact

36. Local residents have raised concerns about the impact of noise and dust from the construction work. They note that other local planning authorities such as Westminster and Kensington and Chelsea require a construction management plan at application stage.
37. Whilst the City does not have draft or adopted policy relating to the information requirements for domestic basement applications, it is considered that it would be appropriate for a construction logistics plan and a scheme for protecting neighbouring occupiers from noise, dust and other environmental effects to be required by condition in order to minimise the impact of the works. The scheme for protecting neighbouring occupiers would be in accordance with the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites. The construction logistics plan would include details of how materials would be transported to and from the site. The details would be submitted prior to the commencement of any excavation work.
38. The applicant has agreed to provide a construction method statement at application stage and is in the process of compiling the details. Members will be advised of its receipt. If it is acceptable it will form part of the approved material and if further information is required it will remain the subject of a condition.

Ventilation of the Basement

39. Concerns have been raised by local residents over the lack of natural ventilation to the extension and the potential need for noisy mechanical ventilation. External vents formed part of the residential conversion works approved under application reference 12/01105/FULL. The vents were required in connection with an air source heat pump system that would serve the dwelling. This system has the capacity to, and would, serve the proposed basement.
40. The applicant has advised that the pumps would be located at third and sixth floor level within the dwelling. Attenuation equipment would be installed in connection with pumps. The applicant has confirmed that the equipment would comply with the City's noise requirement of 10 dBA below background level and this is required by condition.

Fire Escape

41. Local residents have queried the fire escape arrangements for the basement. While outside of planning control, the applicant has confirmed that a fire strategy has been discussed with a building control inspector that is a member of Institute of Fire Engineers and that a residential sprinkler system would be installed in the entire

property in accordance with BS9251:2005: Sprinkler systems for residential and domestic occupancies code of practice.

42. The existing pavement lights were built as fire safety measures as well as letting light into the basement. They would continue to be part of the fire strategy to release smoke from the basement in case of fire.

Impact on Trees and Planting at the rear of the Site

43. The mature tree of heaven at the rear of the site is considered to be an important specimen. Policy CS19 of the Core Strategy seeks to protect the amenity value of trees. The applicant has submitted an Arboricultural Impact Analysis in order to assess the impact of the basement works on the tree.
44. The survey concludes that the construction of the sub-basement would have a negligible impact on the tree. The existing basement and rear elevation of the building would form a barrier between the tree and the proposal. The City's Open Spaces team are satisfied that the survey draws reasonable conclusions and request that basement construction work does not take place from the churchyard. Construction access would be controlled by condition in order to protect the tree.

Archaeology

45. The site is in an area of archaeological potential where there is potential for significant remains from the Roman to post medieval period to survive. The site is within the northern part of the precinct of the medieval Blackfriars Priory, partly inside the north aisle of the nave of the church. Potential for remains from other periods include structures associated with the Roman city wall which lay to the west of the site, early medieval occupation and post medieval structural remains including post dissolution reuse of the priory church. There is potential for the survival of burials associated with Blackfriars Priory and the burial ground of St Ann Blackfriars lies to the immediate south of the site.
46. An Historic Environment Assessment and Archaeological Evaluation Report have been submitted with the application in accordance with policy ARC1 of the Unitary Development Plan.
47. Archaeological evaluation has been carried out in the building to provide additional information on the nature, character and date of archaeological survival. Post medieval brick structures and human bone were recorded. The human bone is considered to have been re-deposited and not to have come from in-situ burials.
48. The proposed excavation to form a new lower basement level would remove all archaeological remains from the footprint of the building. Based on the results of the evaluation and the findings of adjacent archaeological recording, the potential for surviving remains of the Blackfriars Priory to be found is low. The potential for remains from other periods, including burials, to survive remains.

49. Conditions are attached to cover a programme of archaeological work to record surviving archaeological remains, carry out post excavation work, publication and archiving, foundation design and methodology.

Planning Obligations

50. The proposed floorspace increase is such that it would not trigger a CIL or S.106 contribution.

Conclusion

51. The proposed sub-basement would not be visible from ground level or above. It would not harm the significance of the application property, the churchyard or the tree as non-designated heritage assets or the St Paul's Cathedral Conservation Area as a designated asset.
52. The applicant has submitted additional details relating to the proposed structure of the basement and details of ground investigation works carried out to date. The information indicates that the site could accommodate a sub-basement, subject to compliance with other regimes.
53. A scheme for protecting residents from the impacts of construction of the basement and a construction logistics statement would either be approved or required by condition.
54. The applicant has submitted sufficient information to demonstrate that consideration has been given to the ventilation of the basement and the fire escape arrangements such as not to impact on planning considerations.
55. Archaeological evaluation has been carried out and a programme of archaeological work to record remains affected by the development would be required by conditions.
56. It is considered that the proposal accords with the development plan subject to compliance with the conditions.

Background Papers

Internal

22.09.2014 Email City Gardens Manager

External

07.05.2014 Email Donald Pedley

11.05.2014 Letter David French

12.05.2014 Letter Tony and Melanie Medniuk

12.05.2014 Letter Ikuko Kurahone and Jan-Jacob Vershoor

12.05.2014 Letter Marilyn Sullivan

12.05.2014 Email Rafy Kouyoumijian

13.05.2014 Letter Andrew Dunn

13.05.2014 Letter Mark Rance

13.05.2014 Email Yvonne Tabron

19.05.2015 Letter Richard Cole

02.06.2014 Letter Alan Baxter & Associates LLP

15.08.2014 Letter Philip Deane, Ellis and Moore Consulting Engineers Ltd.

18.08.2014 Letter Dominic O Riordan

11.09.2014 Email Mark Rance

11.09.2014 Letter David French

11.09.2014 Email Resident 77 Carter Lane (Requested anonymity)

12.09.2014 Email Jan-Jaap Verschoor

15.09.2014 Letter Tony and Melanie Medniuk

Drawing numbers: 177 150; 177 008 rev. P3; 177 009 rev. P6; 177 010 rev. P9; 177 011 rev. P6; 177 012 rev. P7; 177 013 rev. P5; 177 014 rev. P7; 1177 015 rev. P8; 177 050 rev P2; 177 051 rev P3; 177 052 rev. P3; 1101 L(-4)01 rev. B; 1101 L(-3)01 rev. A; 1101 L(-3)02; 1101 L(-2)01 rev. B; 1101 L(-2)03.

Design and Access Statement

Written Scheme of Investigation dated April 2014

Historic Environment Assessment dated March 2014

Evaluation Report dated June 2014

Calculations Relating to Structural Works dated August 2012

J A C Construction Limited Method Statement for Safe Working (including method and sequence of operations)

Structural Methodology Statement

Arboricultural Impact Analysis dated 17th September 2014

Appendix A

London Plan Policies

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Unitary Development Plan and Core Strategy Policies

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

ENV6 Design of alterations to buildings

To ensure that all alterations or extensions to an existing building take account of its scale, proportions, architectural character, materials and setting.

ARC1 Archaeology - evaluation and impact

To require planning applications which involve excavation or groundworks on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site including the impact of the proposed development.

ARC2 To preserve archaeological remains

To require development proposals to preserve in situ, protect and safeguard important ancient monuments and important archaeological remains and their settings, and where appropriate, to require the permanent public display and/or interpretation of the monument or remains.

ARC3 Recording of archaeological remains

To ensure the proper investigation, recording of sites, and publication of the results, by an approved organisation as an integral part of a development programme where a development incorporates archaeological remains or where it is considered that preservation in situ is not appropriate.

SCHEDULE

APPLICATION: **14/00329/FULL**

75 Carter Lane London EC4V 5EP

Formation of a residential sub-basement (57sq.m).

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.
REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policy of the Core Strategy: CS15.
- 3 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site construction of the development has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14.
- 4 No enabling works or works of excavation for the new sub-basement shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and

approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary or enabling works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policies of the Unitary Development Plan: ARC2, ARC3

- 5 No works of demolition or construction of the new sub-basement shall take place before details of the foundations and piling configuration, to include any temporary or enabling works and a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policies of the Unitary Development Plan: ARC2, ARC3.
- 6 No basement construction work shall take place from the churchyard of St Anne Blackfriars directly to the south of the application site unless otherwise agreed in writing by the Local Planning Authority.
REASON: To ensure the protection of the adjacent tree in accordance with the following policies of the Unitary Development Plan and Core Strategy: EN9, CS15.
- 7 Unless otherwise agreed in writing by the Director of Markets and Consumer Protection the level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the nearest window or facade of the nearest premises. The measurements and assessments shall be made in accordance with B.S. 4142. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. A report demonstrating compliance with this condition must be submitted to and approved in writing by the Local Planning Authority before the plant hereby approved comes into operation.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Core Strategy: CS15, CS21.
- 8 Before any new plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound, in accordance with a scheme to be agreed in writing with the Local Planning Authority.
REASON: In order to protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Core Strategy: CS15, CS21.

- 9 The stability of the existing building to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur to be necessary.
REASON: To ensure the stability of the structure to be retained in accordance with the following policies of the Core Strategy: CS10, CS12.
- 10 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: 1101 L(-4)11 rev. F; 1101 L(-2)11 rev. E; 1101 L(-1) 01 rev. A.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:
- detailed advice in the form of statutory policies in the Core Strategy/ Unitary Development Plan, Supplementary Planning documents, and other written guidance has been made available;
- a full pre application advice service has been offered;
- where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 2 Should access to the churchyard be required for construction work, the contractors/building owner would need to seek permission from St Anne Blackfriars and the City's Open Spaces team.
- 3 This permission is granted having regard to planning considerations only and is without prejudice to the requirements of separate regulations and legislation including building control and the Party Wall etc. Act 1996.

Delves, Gemma

From: PLN - Comments
Sent: 07 May 2014 16:37
To: Delves, Gemma
Subject: Comments for Planning Application 14/00329/FULL

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

Comments were submitted at 4:37 PM on 07 May 2014 from Mr Donald Pedley.

Application Summary

Address: 75 Carter Lane London EC4V 5EP

Proposal: (i) change of use from office (Class B1) to residential (Class C3) use (240.sq.m) (ii) alterations to the Church Entry elevation to create a refuse chamber (iii) extension (24.5sq.m) and alterations at roof level to create a new roof terrace (iv) replacement windows to the south and north facing elevations (v) insertion of a new window in the west facing elevation at sixth floor level (vi) insertion of a roof light at ground floor level and (vii) the insertion of three vents into the rear elevation; (viii) formation of a basement. In accordance with sections 3 and 4 of the City of London (St Paul's Cathedral Preservation) Act 1935, the notice and deposit of plans before commencement of deep level work and intermediate work will follow.

Case Officer: Gemma Delves

[Click for further information](#)

Customer Details

Name: Mr Donald Pedley

Email:

Address: 5, Cathedral Court 68-74, Carter Lane London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: Whilst I welcome the change of use for this building I wish to object to the extension to the roof line for this property. I live in Cathedral Court on the first floor, immediately opposite No. 75. Carter Lane has a medieval street layout - narrowing particularly at this end, and I am concerned that any addition to the roof height will considerably cut out natural light to my apartment.

DAVID FRENCH

architect

24 ALBION SQUARE LONDON E8 4ES

email:

11 May 2014
Gemma Delves
Planning Officer
Development Division - West
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

RE: PLANNING APPLICATION REF: 14/00329/FULL
75 CARTER LANE, LONDON EC4V 5EP

Dear Ms Delves

I am the owner of the leasehold flat No: 6, 77 Carter Lane, London EC4V 5EP which abuts the party wall with No 75 Carter Lane and also a director of Carter Court Management Ltd.

I do not object to the conversion to residential use but certain aspects of the proposals are not acceptable specifically the construction of a sub-basement, insertion of a widow in the party wall at 4th floor level and installation of an air source heat pump. There have been 2 previous planning applications for this property 11/00547/FULL & 12/01105/FULL to which I would have objected if the Planning Department had written to notify neighbouring residents of the application.

I object to the granting of planning permission for the proposed works at 75 Carter Lane because the proposals do not conform to planning policies as set out in the Corporation's Core Strategies Document.

1. 75 & 77 Carter Lane are within the St Paul's Conservation Area and the construction of a sub-basement below the existing basement will be detrimental and have undue impact on the conservation area and is therefore in contravention of the Core Strategy **PolicyCS12 Historic Environment**.
2. The 6.5m deep excavation required to construct the basement provides an unacceptable risk to the structural stability of the party wall to 77 Carter Lane. It is acknowledged by structural engineers that excavation of this nature will produce cracking in the party wall up to level 2 but there is no strategy provided with this application to show how greater damage caused by changing the foundations under the party wall will be resisted. The effect of the abrupt change of foundation depth between the party wall and the front and rear elevations of 77 Carter Lane is not addressed nor is the temporary propping of the excavation to resist lateral ground movement below no: 77 and the effect on bearing capacity of adjacent ground.
3. If construction of the sub-basement was to be approved, a structural methodology statement should be required as part of the application in order to meet your policies of protecting buildings in conservation areas.
4. The rooms provided in the basement should function for the purpose intended. In the sub-basement one room is shown as a bedroom. This space does not provide an acceptable quality of environment in terms of daylighting and ventilation and could

ACKNOWLEDGED

S

Application Ref: 14/00329/FULL

only function as storage. It is not apparent from the application how either basement level is to be ventilated. The new rooflight in St Anne's Burial Ground is non-openable and brings light only to the 1st basement level. There is a note on the drawings that there are vents below the ground floor windows but these are not shown on elevation. How the building is to be ventilated is not clear and it seems possible that the 3no 300x300 vents shown on the rear elevation may not be adequate.

5. It is proposed that the building will be heated by an air source heat pump. No location is shown for the installation. It is unlikely that for a building of this size it will conform to the requirements for permitted development in terms of volume, distance from boundaries and sound pressure level.
6. The drawings do not show how fire escape from the two basement levels or from the 4 floors above ground are to be protected. Although this is a building control issue it may well involve an additional escape route and door at ground level. The open void shown at ground floor level, the bedroom at existing basement level which appears to be an inner room condition and the fire protection of all the stairs will need to be addressed and may require amendments to the plans that will have planning implications.
7. The logistics of basement construction have not been addressed. The site is in a conservation area, Carter Lane is closed to vehicles between 8.00am and 6.00pm each day as part of a policy to reduce traffic and pollution. Carter Lane is now a predominantly residential area and is identified in CoL Core Strategy as 'peaceful high quality residential'. How is the basement to be constructed? No construction management plan has been submitted with the application. Hours of site operations, hours and size of vehicles access, loading/ unloading of materials, mitigation of noise, dust and disruption to neighbouring residents. The site of 75 Carter Lane is the foot print of the building. How is spoil to be stored on site and removed? There should be a requirement for the contractor to have membership of the Considerate Constructors Scheme.
8. The excavation of the sub-basement will result in the destruction of archaeological remains in an archaeological priority area. If this were to be approved an archaeological watching brief should be required during excavation work.
9. The construction of an unnecessary level of basement does not accord with the City's Core Strategy **Policy CS15: Sustainable Development and Climate Change**. The construction of basements uses materials and techniques with very high energy content. The excavation, construction, transportation of construction waste and use of a subterranean development produces a significant amount of Carbon Dioxide (CO₂), which contributes to climate change. In particular, CO₂ is produced during construction with the excavation and transportation of spoil, making and setting of concrete, and in use through the servicing of the space during its life which requires higher levels of energy use for lighting and ventilation. This cannot be said to be sustainable. Limiting the size and extent of the basement will limit carbon emissions and contribute to mitigating climate change. This proposal will not contribute to the City's Strategic Objective of minimising carbon emissions.
10. I object very strongly to the insertion of a window at 4th floor level overlooking the roof of 77 Carter Lane. The Party Wall surveyor acting for 77 Carter Lane has confirmed that this remains the party wall when raised up and no window can be inserted without consent. It will not comply with building regulations.

In the London Boroughs (Kensington & Chelsea, Westminster, Camden, Haringey) that have experienced significant levels of basement construction in residential areas, policies have been adopted or are in the process of adoption to limit the impact of basement construction on neighbourhoods.

Basements have been limited to one storey (3-4 metres) and generally not allowed below listed buildings. It would be in line with general policy to refuse permission for the construction of the sub-basement.

This application should be refused because it endangers the stability of buildings and has an undue impact on the historic environment within the St Paul's Conservation Area. The risks associated with construction of the basement are not offset by the provision of accommodation which is not acceptable as habitable rooms and particularly not bedrooms. It is not a sustainable development and represents an unacceptable use of resources.

Yours sincerely

David French

Tony and Melanie Medniuk

Flat 1, 77 Carter Lane

London EC4V 5EP

Email:

12th May 2014

Ms Gemma Delves

The Department of the Built Environment

City of London

PO Box 270

Guildhall

London EC2P 2EJ

Dear Ms Delves,

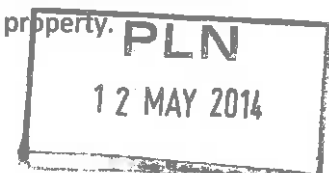
Re: Planning Application REF: [REDACTED]

75 Carter Lane, London EC4V 5EP

We write as the owners of Flat 1, 77 Carter Lane, EC4V 5EP. Our flat, which is a ground /lower ground floor property, adjoins 75 Carter Lane and, accordingly, is very significantly affected by the party wall which connects our respective properties. From the outset, we wish to confirm that we do not in principle object to the conversion into a residential property but, had we been advised by City of London last August (which we were not) of the prior planning proposals, we would definitely have raised certain objections.

With respect to the current application, we have three principal objections: (1) the construction of a sub-basement; (2) the insertion of a window into the party wall; and, (3) the proposed use of an air source heat pump. Also, we have concerns as to how the building process, should it proceed, will be conducted.

The Sub-Basement. Carter Lane is a tight, narrow lane and is an integral part of the St. Paul's conservation area. Our building (no. 77) is quite old and we are very concerned at the potential structural damage to our building which the excavation of a 6.5m hole (at no.75) below its current basement level will create. We think this poses an unnecessarily high risk to the fabric and stability of our building. Inevitably, such a construction will create the potential for stress cracks to occur further up the party wall with consequent degradation not just to the wall itself but also to the structure of no. 77 as a whole. This hazard should not be imposed on our property.



The size of the proposed sub-basement appears rather small for use as a bedroom and there is no apparent suitable ventilation or daylight coming into this space. On this premise alone, it would appear to fall below current standards for a bedroom. Furthermore, from our review of drawings, there is no provision for a protected fire escape route and this too should be a reason to decline the application.

Window in the Party Wall. We are confused and perplexed by this feature and strongly object to it. Our party wall surveyor has confirmed that party wall regulations do apply to this aspect of the plan and that it cannot proceed without our agreement. We understand that this proposal would contravene Building Regulations especially as no such consent has been given by us. We request that this window be removed from the plan

Air Source Heat Pump. It is not clear from the drawings where this pump is to be located. We have prior experience of using such a system and, while there are some ecological benefits, noise abatement is definitely not one of them! In a barn or a country house they are excellent but, in the close confines of Carter Lane, these noisy generators will be very intrusive. Given the size of the property at no. 75, it is unlikely that a single generator, unless it is extremely large, will be sufficient to fulfil heating needs. The increase in noise pollution will be considerable and we would request that this item be declined unless it can be unambiguously demonstrated that noise levels will not be increased as a result of this system being installed.

General. Carter Lane is an important historical locale, a part of the St. Paul's conservation area. We believe the addition of a sub-basement, below existing basement level, will be detrimental to the conserved environment. Although we are not listed, we understand that policy in some London boroughs (Camden, Westminster, Haringey & others) is to limit basement development to not exceed a single story. That would seem appropriate for this plan

The very narrow width of Carter Lane and close proximity of its buildings creates significant logistical challenges for a development of this nature. Carter Lane is pedestrianised between 08.00 and 18.00 and the area is designated by the City in its core strategy as 'peaceful, high quality residential'. We do not know how this basement is to be constructed or how and when spoil would be removed. Whatever plan is approved by the City, we would ask for a pre-agreed construction management plan to be resolved between us. This practice is followed in other boroughs and clearly makes sense in this instance. The prospect for a high level of noise and disturbance arising from this development is inherent in the plan and careful management of it will be critical for existing residents.

Conclusion. We cannot see that the trade-off between the risks posed to the fabric of no.77 and the change to the conservation area generally are either adequately addressed or compensated by the very limited extra accommodation, which may not be suitable for purpose, that will ultimately be achieved by the building of a sub-basement in no. 75. We object to this plan and request it be declined.

Yours sincerely,

TONY & MELANIE MEDNIUK.

Ms Ikuko Kurahone and Mr Jan-jacob Verschoor
Flat 13 Cathedral Court
68 Carter Lane
London EC4V 5EG

The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

12th May 2014

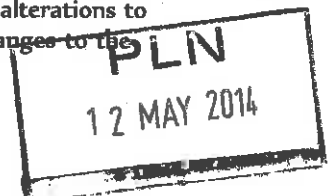
PLANNING APPLICATION REF: [REDACTED]
75 CARTER LANE, LONDON EC4V 5EP

Dear Ms Delves

We are the residents of flat No. 13 Cathedral Court, 68 Carter Lane, EC4V 5EG. We have been the tenants of this address for six years not only for proximity to work but also due to the historic character that Carter Lane offers. We hereby write to protest against the following: application to insert a new window in the west facing elevation at sixth floor level; to form a basement; and to add air source heat pumps, which produce noise, to 75 Carter Lane.

Our main concerns are:

- 1) Our flat is opposite of No. 75 and directly facing the floor where some of the work would be conducted. Due to this proximity (5 meters), we are very concerned about increased noise levels and dust, which is likely to be produced from the construction work and could cause health hazard. Construction work at Ludgate Broadway in 2013 serves as a precedent. For the duration of the work, significant amount of noise and dust was produced, which prevented us from opening the windows during the summertime. Even so, our flat floor, furniture and bed linen was covered by dust. This was especially difficult for Ikuko, who has allergy to house and some industrial dust. We wish to avoid the repeat of this disturbance, which would be on our doorstep.
- 2) For many years, we have been affected by noise emanating from the Patch bar premises, 58-60 Carte Lane, London, EC4V 5EA, and anti-social behaviour from its patrons during the evening and early hours of the morning. Should the planning application at No. 75 Carter Lane be approved, noise will affect us during day and night, for about 18 hours continuously. This will increase our psychological stress and greatly reduce the quality of our lives.
- 3) Carter Lane is located in a residential, conservation area and it is pedestrianized. We appreciate that this was done because the Corporation has designated Carter Lane as a prioritised residential area. There is no vehicular traffic during the day along the lane. Should the application be approved, the builders' lorry would likely park outside during the daytime, for the duration of the works. However, there likely will be spoil removal later in the evening, when the driving restrictions are lifted. Not only would this extent noise pollution beyond normal construction hours, but it is also not clear how this process can be effected in such a cramped area. Our neighbouring boroughs require a Construction Management Plan as a matter of course and do not give consent without it. We request the same.
- 4) Our flat is located on the south east corner of Cathedral Court. Currently, sunlight is only coming from the south side as the east of Cathedral Court is blocked by No. 62-66 Carter Lane. Should any roof-level alterations to No. 75 Carter Lane go ahead, we are concerned that we could face a significant and permanent reduction in sunlight.
- 5) We understand that No. 75 may be located on top of important historical heritage, which should be protected.
- 6) We choose to live here due to the historic character offered by this part of Carter Lane. We currently look out on historic buildings, of which Carter Lane 75 is one. Any alterations to our direct view would change this assessment. We therefore object to any changes to the outside façade of Carter Lane 75.



We hope that the Department of the Built Environment will give our arguments due consideration and refuse this application, thereby preserving the historic environment within the St Paul's Conservation Area.

Yours sincerely

Ikuko Kurahone
Jan-Jacob Verschoor

Ms M Sullivan
Flat 4, 2 Carter Court
London
EC4V 5EN

Ms Gemma Delves
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

12th May 2014

Re: Planning Application ref: 14/00329/FULL
75 Carter Lane, London EC4V 5EP

Dear Ms Delves

I am writing as the owner of 1 Carter Court and Flat 4, 2 Carter Court. Both properties form part of the residential complex including 77 Carter Lane.

I have received no written notice at any time from the City of London concerning 75 Carter Lane but I have now been notified by the other residents of 77 Carter, as well as Directors of Carter Court Management Ltd of the proposed development details. I note that a planning application is pending in-addition to prior applications made and granted last year. As I live at Carter Court and will be impacted by this development I am very concerned as to the proposals and wish to lodge a strong objection.

In-particular to :

- The construction of a sub-basement
- An additional roof extension, terrace, and window in a raised party wall
- The addition of air source heat pumps

1) The proposed sub-basement.

I consider the proposal to be totally unsuitable given the footprint of 75 Carter Lane; its proposed use; as well as the highly likely detrimental impact creating this sub-basement would have on the structural integrity of the party wall with 77 Carter Lane. I have resided at 1 Carter Court which has bedrooms at the basement level since the original conversion from Office development 15 years ago. It was a planning requirement at the time that the basement rooms required light, ventilation, and fire escape access. This was achieved by creating large light wells within Carter Court. However this was possible at the time as Carter Court was within the demise of the overall footprint of the new residential development. I cannot see how the current proposals for a sub-basement at 75 Carter Lane meet the necessary Planning or Building Regulations. It surely is not possible to meet these within the confines of the building footprint. Therefore there will be insufficient provision of ventilation, light, and fire escape access for residential use.

Additionally any major excavation of materials within such a confined and restricted space to create a sub-basement runs a very very high risk of imposing structural

damage on adjacent buildings – particularly the party wall of 77 Carter Lane and so directly impacting many residential properties. Furthermore the works involved will create unacceptable noise and disruption to the neighbouring residents as well as impacting the general use of Carter Lane as a highway.

For these reasons the construction of a sub-basement within the confines of a building within a narrow and cramped street such as Carter Lane is wholly in-appropriate and the planning proposal should be rejected.

2) The additional roof extension, terrace, and window in a raised party wall

The window in the party wall should be immediately rejected as I believe they have no legal right to create this without the consent of the owners of Carter Court Management Ltd – namely all the residents of 77 Carter Lane and Carter Court.

Additionally as the owner of flat 4, 2 Carter Court which is a roof top property, I object to the proposed roof extension and terrace. I believe this will overlook the existing roof level properties and intrude on the views enjoyed by these residents, as well as generating additional noise. Given that Carter Lane is within a Conservation Area it would be inappropriate to permit existing historic buildings to expand upwards without consideration of the detrimental impact on adjoining properties. For these reasons the proposal for the construction of a roof extension and terrace should be rejected.

3) The addition of air source heat pumps

I understand that air source heat pumps generate considerable noise. It is not clear from the planning proposal as to their size or location but the generation of considerable noise pollution would be in-appropriate within the Carter Lane Conservation Area. For this reason this proposal should also be rejected.

In conclusion, the planning application for 75 Carter Lane should only be approved to the extent that developments are strictly within the current shell of the building. Any extension upwards or downwards is detrimental to adjacent residents and is wholly in-appropriate within the historic character of Carter Lane.

Yours sincerely

Marilyn Sullivan

Delves, Gemma

From: PLN - Comments
Sent: 12 May 2014 18:57
To: Delves, Gemma
Subject: Comments for Planning Application 14/00329/FULL

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

Comments were submitted at 6:57 PM on 12 May 2014 from Mr Rafy Kouyoumjian.

Application Summary

Address: 75 Carter Lane London EC4V 5EP

Proposal: (i) change of use from office (Class B1) to residential (Class C3) use (240.sq.m) (ii) alterations to the Church Entry elevation to create a refuse chamber (iii) extension (24.5sq.m) and alterations at roof level to create a new roof terrace (iv) replacement windows to the south and north facing elevations (v) insertion of a new window in the west facing elevation at sixth floor level (vi) insertion of a roof light at ground floor level and (vii) the insertion of three vents into the rear elevation; (viii) formation of a basement.

Case Officer: Gemma Delves

[Click for further information](#)

Customer Details

Name: Mr Rafy Kouyoumjian

Email:

Address: Flat 3 77 Carter Lane London

Comments Details

Commenter type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: Dear Ms Delves, I have no objection to the general conversion to residential use. I do, however, object to a number of the proposed changes. FORMATION OF A BASEMENT (under a basement!) I am concerned about the structural impact on 77 Carter Lane where I own a flat. The probability of damage to this and other adjoining buildings in a conservation area of archaeological importance warrants, in my view, detailed plans about how such risks will be managed, monitored and minimised during the excavation construction phase. I believe the CoL has policies in place to protect buildings in conservation areas. Are you satisfied that the current application meets these policies? Given the narrow street scene, I am concerned at the lack of a detailed construction management plan addressing issues such as

hours of work, vehicle size/access as well as waste removal. Given Carter Lane is such a densely populated and highly residential area, I would expect the Corporation of London to request and monitor such a logistical plan before granting consent, in line with other London boroughs. If the purpose of this 'sub-basement' is to increase habitable space (consistent with general CoL policy), then the current plans do not appear to support this from the point of view of natural daylight, adequate ventilation and fire safety. If the space is to be used as storage, then I don't consider the above risks worth taking. AIR SOURCE HEAT PUMP I am concerned about the lack of detail around the location of such a pump. The potential for associated noise pollution needs to be addressed before consent is granted. Thank you for considering these important points when making your decision. Regards, Rafy Kouyoumjian

Flat 6A
77 Carter Lane
London
EC4V 5EP

13th May 2014

RE: Planning Application Ref: 14/000329/FULL
75 Carter Lane, London EC4V 5EP

Dear Ms Delves,

I would like to register my objections to some of the elements within the above proposed planning application.

1) I am concerned about the proposal to construct a sub-basement below No. 75 Carter Lane. This has the potential to impact on the structural integrity of buildings in Carter Lane and more particularly on the party wall with No. 77 Carter Lane. The fact that this sub-basement is intended to be at a level below any existing basements leads me to suspect that any structural problems forthcoming would be severe and potentially hazardous. Furthermore, the provisions for adequate natural lighting and ventilation for the sub-basement level do not seem to be satisfactorily detailed for the purpose that they are intended for.

2) Alterations proposed at roof level to create a roof terrace and to insert a window with a west facing aspect into the party wall are not acceptable. The addition of an outside terrace would create the potential for ongoing noise and disturbance for local residents, particularly in the evening. The canyon-like topography of Carter Lane, which tends to amplify any sound, would exacerbate this. The inclusion of a window overlooking the roof of No 77 Carter Lane would seem to go against normal planning allowances and would need specific permissions that would unlikely to be forthcoming.

3) It is not obvious from the proposal where the air source heat pump would be located. However, an external location on the roof or walls of No. 75 Carter Lane would cause considerable and ongoing noise impact to adjoining properties. This does not seem to be a sensible use of this technology and its inclusion in the proposal should be rejected.

To conclude, I would support the change of usage from office to residential for 75 Carter Lane but as a resident of 77 Carter Lane would strongly object to the particular proposals detailed above.

Yours Sincerely,

Andrew Dunn

13 MAY 2014

████████████████████ Mr Mark Rance
Flat 8
77 Carter Lane
London EC4V 5EP

8th May 2014

Re: 75 Carter Lane London EC4V 5EP

13 MAY 2014

Dear Ms Delves

We hereby write to protest against the following: application to insert a new window in the west facing elevation at sixth floor level; to form a basement; and to add air source heat pumps (which produce noise), to 75 Carter Lane.

We note again that no-one in our building was advised of this process on 18th August 2013 (as your first letter indicated) and so lack of objections at that stage did not indicate consent. We appreciate that such notification by you is not required by law, but it is good practice and our neighbouring boroughs do notify neighbours.

Our main concerns are:

- 1) Our flat adjoins no. 75, and our building (no. 77) is not new. We are very concerned about structural damage inflicted when digging out a basement at no. 75.
- 2) We are baffled by the proposed plans. We note that the proposed basement has no light and ventilation (and so would not be habitable as a bedroom), and no protected fire escape route, unless one is made into Church Entry – in which case this should be clearly marked on the plans and planning consent sought. We don't understand the creation of a window at sixth floor level, as this would be in our joint party wall, which contravenes building regulations (yet we gather that it already has approval!).
- 3) We are in a conservation area, which is also highly residential. Carter Lane is pedestrianised, and this was done, we understand, because the Corporation has designated Carter Lane as a prioritised residential area. There is supposed to be no vehicular traffic during the day along the lane. When 75 Carter Lane was stripped out (an exceptionally noisy process), the builders' lorry was parked outside during the daytime, for the duration of the works. This will presumably be repeated should the proposed basement go ahead, and we have not been informed how the spoil is to be removed. As well as noise during the daytime, presumably there will be spoil removal at night when the driving restrictions are lifted. It is not clear how this noisy, obstructive, nuisance-causing process can be effected in such a cramped area. Our neighbouring boroughs require a Construction Management Plan as a matter of course and do not give consent without it. We request the same.
- 4) We live on the top floor of no. 77 Carter Lane, and are surrounded by noise-producing plant, which is very obtrusive during the summertime when our windows are open. The building opposite ours on the south side, across St Ann's Churchyard,

installed plant a few years ago. We asked Dawn Patel of the Corporation's Environmental Health Department to assess it but paradoxically as there was so much noise she was unable to ascertain "background noise", so that she could not measure how much noise it alone was producing. We would insist that "background noise" be measured by the Corporation before the installation of any air source heat pumps, so that the increase in decibels once operative could be measured. We include in this objection any air extract vents that are installed, as we cannot see from the plans how ventilation of the building is intended, nor where.

5) Some of us in 77 Carter Lane have a view of St Paul's Cathedral, and this is likely to be obstructed by the roof-level alterations. Can a neighbour just take away a resident's Cathedral view? Is there not legislation on Cathedral site-lines?

6) As an ancient heritage site, we note that no. 75 "lies possibly along, or adjacent to, the line of the western Roman city wall" and "Breaking out the concrete slab, excavation of the new sub-basement and underpinning of existing foundations would entirely remove any surviving archaeological remains within the footprint of the works, reducing asset significance to negligible" (quoted from the Museum of London's 2014 report).

We further note "it is recommended that archaeological evaluation of the site take place in order to clarify the likely extent of ground disturbance and the possible presence, depth and significance of any archaeological remains".

Finally, we report ten years of mice and rats in 77 Carter Lane (we bought our flat ten years ago). Discreet Pest Control has been working to solve this problem throughout. As well as the tremendous noise and dust and blockage that adding a storey and basement to no. 75 will cause, we have every reason to fear an increase in vermin within our flats. For all these reasons, we would ask that the Corporation of London permit the Edwards' to refit no. 75 for residential use, but retain the shell of the building as it stands.

Yours sincerely



Mark Rance

Delves, Gemma

From: PLN - Comments
Sent: 13 May 2014 13:31
To: Delves, Gemma
Subject: Comments for Planning Application 14/00329/FULL

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

Comments were submitted at 1:30 PM on 13 May 2014 from Ms Yvonne Tabron.

Application Summary

Address: 75 Carter Lane London EC4V 5EP

Proposal:

(i) change of use from office (Class B1) to residential (Class C3) use (240.sq.m) (ii) alterations to the Church Entry elevation to create a refuse chamber (iii) extension (24.5sq.m) and alterations at roof level to create a new roof terrace (iv) replacement windows to the south and north facing elevations (v) insertion of a new window in the west facing elevation at sixth floor level (vi) insertion of a roof light at ground floor level and (vii) the insertion of three vents into the rear elevation; (viii) formation of a basement.

Case Officer: Gemma Delves

[Click for further information](#)

Customer Details

Name: Ms Yvonne Tabron

Email:

Address: Flat 6A 77 Carter Lane London

Comments Details

Commenter type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: As an owner and resident at 77 Carter Lane and having recently been notified of a planning application for 75 Carter Lane London, EC4V 5EP I am writing to object most strongly to certain elements within the planning proposal. 1. The proposed basement seems to fail to provide extra residential capability given that there is no planned natural light and ventilation and no protected fire escape route. This sub-basement proposal (below the pre-existing basement) also introduces structural risk to our property, the publicly maintained road and surrounding buildings. As a property owner with an adjoining party wall with No. 75 I am particularly worried that the structural integrity of our building may be compromised with the execution of the proposed scheme. 2. Access and egress to No 75 is limited and

Carter Lane is a very small and narrow road which is pedestrianised during the day. Given that a substantial amount of rubble and soil waste will be produced from the excavation, it is not clear how this will be handled. Lorry activity can only take place during the evenings and weekends which will cause significant disturbance both in terms of noise and access to our property. In addition, a number of the service activities to the buildings in Carter Lane take place during the early evening and it is not clear how refuse collection and similar activity could take place if the road was blocked through waste removal vehicles. Will a Construction Management Plan be required similar to that sought in the neighbouring boroughs? 3. The addition of an air source heat pump (or pumps) introduces a concern around noise pollution. During the day there is a degree of background noise in Carter Lane, but at night it is a relatively peaceful residential area. My previous experience of air source heat pumps is that they are extremely noisy and entirely not suitable for a high density urban development such as this. Although the location of the pump seems not to have been determined, and indeed would cause disturbance wherever sited, common sense would point toward an outside wall or rooftop installation. This would adversely affect residents, particularly those on our upper floors and particularly at night, and would seem to be unacceptably detrimental to peace and quiet of the neighbourhood. It would be useful to undertake an assessment of the background noise during the evening to understand the impact that the addition of the pump would have. Equally, there doesn't appear to be the provision for ventilation on the current plan but I presume that ventilation will be required and hence my pre-emptive objection to extractor vents, particularly given that they are likely to be very close to bedroom windows. 4. Finally, I object to the window in the west facing elevation at sixth floor level which is in our party wall and overlooks our building. I am given to understand that this already has planning permission (without any notification to us as the parties to the party wall). In summary, I do not object to the development of No. 75 for residential use, but it should be undertaken within the footprint and shell of the current building in order to protect against the aforementioned risks. Thank you for your consideration.

15th May 2014

Gemma Delves
 Planning Officer
 Department of the Built Environment
 City of London
 PO box 270
 Guildhall
 London EC2P 2EJ

Flat 7
 77 Carter Lane
 London
 EC4V 5EP

19 MAY 2014

~~MAY 2014~~

ACKNOWLEDGED

Dear Ms Delves

Re: Planning Application of 75 Carter Lane, EC4V 5EP

I write to register my strong objections to certain aspects of the planning application for the above property. Before I specify my objections below I am concerned that apparently various planning consents may have already been provided and yet notification of the applications has only been provided directly to me through your letter of 22nd April 2014.

My first objection is to the proposed sixth floor extension and terrace. I currently enjoy a good view of the dome and upper west roof towers of St Pauls from my upper floor flat in 77 Carter Lane. The enjoyment of this view is an important part of the residential amenity of my property. The proposed 6th floor extension will obstruct my view of St Pauls unless it is reconfigured to place the extension of the north of 75 Carter Lane. Similarly we are increasingly witnessing neighbouring buildings growing in height and leading to sun and light obstruction in our flats and this proposed roof extension on 75 Carter lane exacerbates this issue. We understand that the proposed window in the 75 / 77 party walls at roof level has been dropped but clearly I would have objected to this on building control grounds.

I also strongly object to the proposed creation of a new basement level in 73 Carter Lane. The danger to our building from potential subsidence, the protection of the archaeological heritage beneath the site and the impact on the conservation area of Carter Lane during construction are my greatest concerns. As you will know Carter Lane is closed to motor traffic and the proposed site is very constrained with much pedestrian traffic day and night. It seems inconceivable that such major works could be undertaken without major disruption, noise and dirt for all using the area for many months. The required Construction management Plan would need to be highly specified and monitored for such an exercise to even be considered but I feel strongly that the applicant's request should be rejected before the inhabitants and office workers of Carter lane are subjected to such disruptions for many months.

S

Finally it would appear that the application proposes an air heat pump at roof level. I object to this as totally inappropriate in a dense, inner city conservation area where noise and air/heat pollution from roof mounted machinery is already too high. Consideration should be given to ensuring proper insulation of roofs, walls and windows is the best route to energy conservation in this office to house conversion and that the conservation solution does not place a further burden on the quiet enjoyment of neighbours' properties.

I should add that I and some of my neighbours are prepared to enter into constructive dialogue with the applicants to help them achieve the overall objectives of the house conversion. However, I strongly feel that the above noted elements have to be rejected from the application as being unsuitable and unnecessary developments for the building, the area and the Carter lane residents and workers.

Yours sincerely

A large black rectangular redaction box covering the signature of the sender.

Richard J Cole

Hampson, Rebecca

OFFICE COPY

14/00329
PLN
10 SEP 2014

From: Delves, Gemma
Sent: 11 September 2014 09:35
To: DBE - PLN Support
Subject: FW: OBJECTION to the application to build a sub-basement at 75 Carter Lane

Please can this be acknowledged and put on the web. It is in conjunction with application 14/00329/FULL.

Thanks

Gemma

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

From: Mark Ranc
Sent: 10 September 2014 21:44
To: Delves, Gemma

Subject: OBJECTION to the application to build a sub-basement at 75 Carter Lane

Dear Gemma,

Many objections were raised to the building of a residential sub-basement at 75 Carter Lane in an email from David French of 77 Carter Lane back in May. Most of the objections he raised then were to the construction of the sub-basement and still stand. I am echoing here his points and adding my own objections. In summary his objections were:

1. Archaeological loss
2. Structural damage to both buildings was possible
3. Effect on conservation area
4. Quality of habitable accommodation provided by sub-basement
5. Fire escape from basement was insufficient
6. Logistics of basement construction were poorly planned
7. Construction of a sub-basement uses high energy content materials & construction techniques which does not accord with CofL Core Strategic Policy
8. The City of London has no policy on residential basements. Other boroughs with significant levels of basement construction have adopted policies to limit basement construction and its effects on neighbours.

The current application has much more detail than the one prior and some of these issues have been addressed in the new information submitted with the application but there remains several reasons to object strongly:

1. The archaeological survey and report confirms that little of archaeological value will be lost by the excavation. However, the site sits on Roman ruins. There is reason then to reconsider the report.
2. A structural report and methodology statement has been included which explains the process of excavation and construction. But there remains strong doubt that Mr. Edwards, an amateur builder, can successfully execute this plan without risking great damage.
3. The effect on the conservation area is still a legitimate concern.
4. Personally, I agree with David French and consider the quality of the proposed habitable accommodation to be unacceptable. In other words what is the value to be gained here?
5. This issue has been dealt with by the proposed installation of sprinklers and smoke extract form the basement to the apparent satisfaction of Building Control. The Building Inspector appears to favour active measures of fire protection to passive ones.

ACKNOWLEDGED

6. Mr Edwards has produced a plan to minimise the impact on us as neighbours by hand excavation and removal of spoil from site by barrow to lorries which will not wait in Carter Lane. However, breaking up of the concrete of the existing basement slab will still be a very noisy operation. This should not be minimised, and it will likely go on for weeks. In fact, to date all of Mr. Edwards work to remove rubble has been disruptive. Removing the basement rubble is likely only to make matters much worse. Given the way the works currently in process have gone there is no reason to think Mr. Edwards can adhere to his plan nor contain the disruption he will cause.

7. This objection still stands.

8. I agree with David French here and would like to see the City of London adopt a policy similar to other boroughs regarding basement dwellings and apply it to this application.

My overall feeling is that the basement construction will bring severe and prolonged disruption in addition to that which we currently suffer from the works to the rest of the building.

Our strong objections to the previous application have meant that proper consideration has had to be given to the design and process of construction. Undoubtedly there are risks and drawbacks associated with the sub-basement construction but the best outcome for us would be a refusal of the application.

In fact the cons outweigh the pros even more when compounded by the glaring fact that Mr. Edwards is not a professional builder, architect nor someone with construction experience. Complicated and problematic works of the kind outlined in the proposal should not be trusted to an amateur. It is a recipe for disaster.

The balance of risk and advantage to be considered between the underpinning of the wall at Mr Edwards' expense and leaving the existing structure untouched leaves us with no choice but to express the very strong opinion that no permission should be granted for such works.

I want to clearly state that I OBJECT to any works of this nature and I hope that the City of London will deny the application.

Yours,

Mark Rance
Flat 8
77 Carter Lane
EC4V 5EP

Sent from phone. Please excuse any typos.

PLANNING & TRANSPORTATION		
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No		
FILE		

DAVID FRENCH

architect

24 ALBION SQUARE LONDON E8 4ES

11 September 2014
 Gemma Delves
 Planning Officer
 Development Division - West
 The Department of the Built Environment
 City of London
 PO Box 270
 Guildhall
 London EC2P 2EJ

ACKNOWLEDGED

RE: **PLANNING APPLICATION REF: 14/00329/FULL**
75 CARTER LANE, LONDON EC4V 5EP

Dear Ms Delves

I am the owner of the leasehold flat No: 6, 77 Carter Lane, London EC4V 5EP which abuts the party wall with No 75 Carter Lane and also a director of Carter Court Management Ltd.

On 11 May 2014 I sent a letter of objection to this planning application as then submitted. My objections mainly related to the construction of a sub-basement at 75 Carter Lane and therefore still stand in relation to the present revised application. I have updated that letter to take account of the additional information submitted.

I object to the granting of planning permission for the proposed sub-basement at 75 Carter Lane because the proposals do not conform to planning policies as set out in the Corporation's Core Strategies Document.

1. 75 & 77 Carter Lane are within the St Paul's Conservation Area and the construction of a sub-basement below the existing basement will be detrimental and have undue impact on the conservation area and is therefore in contravention of the Core Strategy **Policy CS12 Historic Environment**. It will not comply with your policies of protecting buildings in conservation areas.
2. The 6.5m deep excavation required to construct the basement provides an unacceptable risk to the structural stability of the party wall to 77 Carter Lane. It is acknowledged by structural engineers that excavation of this nature will produce cracking in the party wall up to level 2. The lack of a strategy has been addressed in the revised application but still does not show how greater damage caused by changing the foundations under the party wall will be resisted. The effect of the abrupt change of foundation depth between the party wall and the front and rear elevations of 77 Carter Lane is still not addressed. The method statement for safe working from JAC Construction describes the process of temporary propping proposed. The adequacy of this to resist lateral ground movement below no: 77 and the effect on bearing capacity of adjacent ground is not clear. The sequence drawing states that temporary propping of the structure is the sole responsibility of the contractor so the safety of the party wall and adjacent building is dependent on the contractor's competence to carry this out. JAC Construction may be a competent contractor but there is no guarantee that they will be carrying out the work or that it will be adequately supervised.



3. The Structural Methodology statement in figure 2.2 refers to 77 Carter Lane as a concrete/steel frame building. It should be noted that the external and party walls of no 77 are of loadbearing masonry. The party wall with 77 is, therefore, loadbearing along its entire length and not a framed structure.
4. The rooms provided in the basement should function for the purpose intended. In the sub-basement one room is shown as a bedroom – a habitable space. This space does not provide an acceptable quality of environment in terms of daylighting and ventilation and could only function as storage. It is not apparent from the application how either basement level is to be ventilated. The new rooflight in St Anne's Burial Ground is non-openable and brings light only to the 1st basement level. There is a note on the drawings that there are vents below the ground floor windows but these are not clear on elevation. How the building is to be ventilated is not clear from the submitted documents and it seems possible that the 2no 300x300 & no 300x200 vents shown on the rear elevation may not be adequate.
5. The revised information submitted with the application implies that the arrangements for fire escape are considered acceptable to Building Control. Personally, I am concerned that escape from 4 floors above ground and 2 levels of basement relies purely on the operation of a sprinkler system and not additionally on any passive measures.
6. The structural procedure for construction of basement has been addressed in the documents provided. However, the site is in a conservation area, Carter Lane is closed to vehicles between 8.00am and 6.00pm each day as part of a policy to reduce traffic and pollution. Carter Lane is now a predominantly residential area and is identified in CoL Core Strategy as 'peaceful high quality residential'. How is the basement to be constructed? No construction management plan has been submitted with the application detailing hours of site operations, hours and size of vehicles access, loading/unloading of materials, mitigation of noise, dust and disruption to neighbouring residents. The site of 75 Carter Lane is the foot print of the building. How is spoil to be stored on site and removed? This all needs to be addressed in a construction management plan. It is of concern that the method statement for safe working provided by JAC Construction in section 5 states: **The property is within a residential area and effort should be made to avoid noisy works before 8.00am in consideration of neighbouring properties.**
 Given the residential character of the neighbourhood there should be no noisy work outside the working hours permitted by the City of London and a planning condition should be attached to any permission. Additionally, there also should be a requirement for the contractor to have membership of the Considerate Constructors Scheme.
7. The excavation of the sub-basement will result in the destruction of archaeological remains in an archaeological priority area. An archaeological watching brief should be required during excavation work as a requirement of any planning permission.
8. The construction of an unnecessary level of basement does not accord with the City's Core Strategy **Policy CS15: Sustainable Development and Climate Change**. The construction of basements uses materials and techniques with very high energy content. The excavation, construction, transportation of construction waste and use of a subterranean development produces a significant amount of Carbon Dioxide (CO₂), which contributes to climate change. In particular, CO₂ is produced during construction with the excavation and transportation of spoil, making and setting of concrete, and in use through the servicing of the space during its life which requires higher levels of energy use for lighting and ventilation. This cannot be said to be sustainable. Limiting the size and extent of the basement will limit carbon emissions and contribute to mitigating climate change. This proposal will not contribute to the City's Strategic Objective of minimising carbon emissions.
9. in order to meet your policies of protecting buildings in conservation areas.

The Corporation should understand the level of hostility felt by residents to the disruption caused by the unnecessary construction of basements in residential areas. A recent

application for construction of a sub-basement in LB Hackney at 42 Northchurch Road N1 4EJ received 39 letters of objection causing the applicants to withdraw this part of the application. In the London Boroughs (Kensington & Chelsea, Westminster, Camden, Haringey) that have experienced significant levels of basement construction in residential areas, policies have been adopted or are in the process of adoption to limit the impact of basement construction on neighbourhoods.

These policies have limited basement construction to one storey (3-4 metres) and generally not allowed them below listed buildings. It would be in line with general policy to refuse permission for the construction of the sub-basement.

This application should be refused because it endangers the stability of buildings and has an undue impact on the historic environment within the St Paul's Conservation Area. The risks associated with construction of the basement are not offset by the provision of accommodation which is not acceptable as habitable rooms and particularly not bedrooms. It is not a sustainable development and represents an unacceptable use of resources.

Yours sincerely

David French

Ball, Matthew

From: DBE - PLN Support
Subject: FW: carter lane 75 application for a sub-basement

From: Jan-Jaap Verschoor [REDACTED]
Sent: 12 September 2014 00:17
To: Delves, Gemma
Cc: [REDACTED]
Subject: carter lane 75 application for a sub-basement

12 SEP 2014

Hi Gemma,

ACKNOWLEDGED

We herewith would like to object to the application for a sub-basement at no 75 Carter Lane.

We live directly opposite of 75 carter lane and accordingly have much to suffer from those construction works, however it appears that noise pollution is not a valid argument to prevent further construction works..... unfortunately it is precisely the noise pollution associated with back-to-back construction works on this end of carter lane, that have rendered this residential area truly inhabitable.

So, as we on prior occasions have failed to communicate to the licensing committee the precise extent to which the narrow street and high walls on this side of carter lane, 'trap' the noise (thereby making construction activities here much more of a hindrance to residents than in other streets), I have shot some videos of the 75 carter lane construction works.... hoping to convey the extent of the noise pollution associated with construction works on this end of carter lane (each recording is 30 sec, i.e. ~50 MB, which should download within 1 min):

- Drilling: http://www.jan-jaap.com/carter_lane/IMG_0533.MOV
- Electric saw: http://www.jan-jaap.com/carter_lane/IMG_0461.MOV
- Cutting of iron bar on the public street: http://www.jan-jaap.com/carter_lane/IMG_0444.MOV
- Handling of equipment whilst not in operation: http://www.jan-jaap.com/carter_lane/IMG_0396.MOV
- Loading stone rubbish into truck (indeed at 7:28 am on a Saturday morning): http://www.jan-jaap.com/carter_lane/IMG_0314.MOV
- Radio: http://www.jan-jaap.com/carter_lane/IMG_0524.MOV

And all this whilst...

- Patch Bar customers keep us awake at night (http://www.jan-jaap.com/carter_lane/IMG_0460.MOV) and
- more customary maintenance activities continue (http://www.jan-jaap.com/carter_lane/IMG_0424.MOV)

Now, there is a lot of support from the police and other support functions within the City of London, which we truly appreciate, however as long as the licensing committee continues to hand out licenses for construction activities as if they were hot sausages, it is like mopping with the tap open.

So I would like to ask the licensing committee not to grant this application for the construction of a sub-basement at 75 carter lane, solely to allow people to return back to their lives again on this side of carter lane, even if only for 1 month, before 69 carter lane construction works kick in, as we have faced back-to-back construction works for more than a year-and-a-half now (and I do mean month-in-month out, week-in-week out, day-in-day out, rendering days



without pneumatic hammers/drills a distant memory by now) and ultimately the intent of a residential area is that people actually can live there.

Kind regards,

Jan-Jaap Verschoor
68 Carter Lane
Cathedral Court, flat 13
EC4V 5EG, London
United Kingdom

Email:

15 Sept 2014

Ms Gemma Delves
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Dear Ms Delves,

Re: Planning Application REF: 14/00329/FULL

75 Carter Lane, London EC4V 5EP

Formation of a Residential Sub-basement

Thank you for your letter of 19 August, 2014 which we have only very recently received on return from an extended trip to Australia. Our travel had commenced prior to your letter being written.

We write as the owners of Flat 1, 77 Carter Lane, EC4V 5EP. Our flat, which is a ground /lower ground floor property, adjoins 75 Carter Lane and, accordingly, is very significantly affected both by the party wall which connects our respective properties and especially by the proposed development of a residential sub-basement. From the outset, we wish to confirm that we do not in principle object to the conversion into a residential property but, had we been advised by City of London last August (which we were not) of the prior planning proposals, we would definitely have raised certain objections.

With respect to the current application, we have three principal objections: (1) the unacceptable risk posed to the structural integrity of the foundations of 77 Carter Lane and also to the party wall shared by the two properties which would arise from the construction of a sub-basement; (2) the resulting residential accommodation would not be fit for purpose; and, (3) the unnecessary destruction of archaeological remains in a noted historic priority area. Also, we have concerns as to how the building process, should it proceed, will be conducted.

Risk to no. 77.

Carter Lane is a tight, narrow lane and is an integral part of the St. Paul's conservation area. Our building (no. 77) is quite old and we are very concerned at the potential structural damage to our building which the excavation of a 6.5m hole (at no.75) below its current basement level will create.

We think this poses an unnecessarily high risk to the fabric and stability of our building. Inevitably, such a construction will create the potential for stress cracks to occur further up the party wall with consequent degradation not just to the wall itself but also to the structure of no. 77 as a whole. This unnecessary hazard should not be imposed on our property.

Usable Accommodation.

The size of the proposed sub-basement appears rather small for use as a bedroom and there is no apparent suitable ventilation or daylight coming into this space. On this premise alone, it would appear to fall below current standards for a bedroom. Furthermore, from our review of drawings, there is no provision for a protected fire escape route and this too should be a reason to decline the application. The proposed roof light will only provide light to the 1st basement not to the sub-basement. A sprinkler system is the only protection to support escape from the sub-basement, which, we think, does not meet current safety standards.

Archaeological Priority Area.

Carter Lane is an important historical locale, a part of the St. Paul's conservation area. We believe the addition of a sub-basement, below existing basement level, will be detrimental to the conserved environment. Although we are not listed, we understand that policy in some London boroughs (Camden, Westminster, Haringey & others) is to limit basement development to not exceed a single storey. That would seem appropriate for this plan. There is no compelling reason to for this sub-basement to risk compromising such an established historical area.

General.

The very narrow width of Carter Lane and close proximity of its buildings creates significant logistical challenges for a development of this nature. Carter Lane is pedestrianised between 08.00 and 18.00 and the area is designated by the City in its core strategy as 'peaceful, high quality residential'. We do not know how this basement is to be constructed or how and when spoil would be removed. Whatever plan is approved by the City, we would ask for a pre-agreed construction management plan to be resolved between us. This practice is followed in other boroughs and clearly makes sense in this instance. The prospect for a high level of noise and disturbance arising from this development is inherent in the plan and careful management of it will be critical for existing residents.

Conclusion. We cannot see that the trade-off between the risks posed to the fabric of no.77 and the change to the conservation area generally are either adequately addressed or compensated by the very limited extra accommodation, which may not be suitable for purpose, that will ultimately be achieved by the building of a sub-basement in no. 75. We object to this plan and request it be declined.

Yours sincerely,

TONY & MELANIE MEDNIUK.

Delves, Gemma

From: [REDACTED]
Sent: 11 September 2014 09:24
To: Delves, Gemma
Subject: Objections to the current application for a sub-basement at no 75 Carter Lane

Dear Gemma

I hereby object to the current application for a sub-basement at no 75 Carter Lane. I live in the flat adjoining the party wall (in no. 77 Carter Lane), and as I write, workmen are trampling on our roof (which they have been doing since 8.15am this morning) and repeatedly dropping heavy loads on it, and drilling. Living next door to a building site whilst trying to write a book and bring up a child is intolerable. I am typing this in my flat with every window and door closed whilst wearing industrial headphones that I bought from a hardware shop, the kind that drillers wear. They do not cut the noise, only mitigate it, and are highly uncomfortable, but I am at my wit's end as to how to continue to live my life. Breaking up a basement will cause worse noise pollution. We have suffered greatly recently, not just from no. 75 but also from the changing from offices to flats on the corner of Carter Lane and Blackfriars Lane. Carter Lane is one of the narrowest lanes in the City, meaning that building-site noise is exacerbated.

I gather that the City of London has no policy on limiting basement construction and its effects on neighbours, despite the widespread concern about it in the press, and the reaction by other London boroughs. I note the MOLAS's report that both 75 and 77 Carter Lane are likely to lie directly atop the Roman Wall. I note that Carter Lane is in a Conservation Area, and that this provides grounds for objection to both disturbing the integrity of old buildings and intruding extensions onto the skyline - a process that is going ahead, apparently, I gather, with Corporation permission, even though we were not notified about it in advance.

There are other objections: to the structural safety of our building, to the doubtful habitability of the basement, to the logistics of spoil removal; but whilst this knocking, banging, drilling, dropping (not to mention the workmen's language - I have a ten year old) and loud sound is going on, this is my main objection.

Yours sincerely

[REDACTED]
Flat 8
77 Carter Lane