
From: Charlotte Freeman
Sent: 24 November 2024 13:56
To: Planning
Subject: 10 Pratt Mews objection - 2024/4426/P
Attachments: 10 Pratt Mews objection.docx

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Good afternoon,

I have submitted an online response to the planning application at 10 Pratt Mews, but could not attach photos. Please find attached a full copy of my response with photos, which I would like to be considered. The text is the same as my online response, except it has references to the photos in the attached version.

Thank you!

Kind regards,
Charlotte Freeman

Dear Sir/Madam,

I am writing to strongly object to the proposed construction of an additional storey at 10 Pratt Mews. I have divided my grounds for objecting to the development into subsections below for clarity.

Light levels

I live opposite the proposed development site on the first floor (windows 62 and 63 in the Daylight and Sunlight Assessment). The proposed additional storey would obstruct the already limited natural light that is able to enter the property to the extent that it does not comply with the standards set out by the BRE guidelines. The reduction in daylight would make the property unliveable and have a detrimental impact on the wellbeing of those of us who live in the property.

BRE guidelines state that daylight in a room may be adversely affected if the area of the working plane in a room is reduced by 20% of its former value. The Daylight and Sunlight Assessment reports that the proposed development would reduce the Daylight Distribution of window 62 by 38% of its former value, far exceeding the BRE limit. The applicant argues in the report that the reduction in daylight to this room is less important because it is a bedroom. However, I would like to emphasise that this master bedroom is used as a workspace and study constantly throughout the day. The flat is occupied by two students and a self-employed person. We all work from home and have no choice but to use this bedroom as a study. The current lack of light to our largest living space – the living room/kitchen served by window 63 – makes it even more vital to preserve the greatest amount of natural light we receive in the property from window 62. In fact, the only source of visible sky for window 63 comes from the limited space above 8-9 and 10 Pratt Mews (see Figure 1). Therefore, the construction of an additional story at 10 Pratt Mews will have a serious effect on our main living area too.

The BRE guidelines state that it is particularly noticeable to occupants when the 'no sky line' encroaches on key areas like kitchen sinks and worktops. I have measured the 'no sky line' in the master bedroom using the diagram in Figure D1 Appendix D of the BRE guidelines. Currently the 'no sky line' reaches past our desk space. The proposed development would bring the 'no sky line' far behind the desk and quite close to the window. The small area of the bedroom would make it difficult to achieve a configuration where the desk would receive natural sunlight. Please see the view from the centre of window 62 (x0.5 lens) in Figure 2, which displays more simply just how much visible sky we would lose if the proposed development was to go ahead.

It is also important to note that window 61, which serves a living room/kitchen area in Flat 3, is also significantly impacted by the construction of an additional storey at 10 Pratt Mews. Window 61 would suffer an astronomical 47% decrease in its Daylight Distribution figures, dropping to 38%. Again this is a much larger decrease than the 20% BRE limit. The consultants argue that the room is over 5m deep, however, given that the decrease is so significant, the Daylight Distribution would likely still reduce past the 20% limit even if the room was exactly 5m deep.

Both windows 61 and 62 serve as main living spaces and are used constantly throughout the day. As such, any reduction of daylight to these rooms, let alone a reduction far exceeding the BRE limits, will have an immeasurably detrimental effect on those living in these properties.

Window 24 of 84 Camden High Street also fails to comply with BRE guidelines for the Daylight Distribution reduction it would suffer. It is unclear what the use of the room served by this window is, being labelled only as "Non-domestic", but the other windows in this building serve residential living rooms. No attention has been drawn to this in the application.

Furthermore, Daylight Distribution has not been provided for the entirety of 86 Camden High Street or 11 Pratt Mews, as well as 6 other windows in various properties. Seeing as the vast majority of these windows belong to residential properties and as 86 Camden High Street directly faces 10 Pratt Mews, these windows should be tested before the application can be considered for approval. The construction of an additional storey could have a serious negative impact on the Daylight Distribution to these windows potentially serving primary living spaces.

According to the BRE guidelines, a Vertical Sky Component (VSC) of 27% is generally sufficient to ensure adequate daylight through standard window designs. It is worth noting that 33 of the windows considered in the VSC test already have a VSC below 27%, so any further reduction, even if small, will have a disproportionality negative effective on the quality of life of the people that use those rooms. Over 50% of these 33 windows will suffer if the construction of an additional storey at 10 Pratt Mews is approved. Given that the proposed development affects the day-to-day lives of so many people, it should at least be for a good cause. However, the additional storey will only provide 53m² of office space. The entire 3 floors of 10 Pratt Mews will only house the equivalent of 20 full-time employees, few of which will be seated on the top floor. The development will therefore provide little to no public benefit.

Moreover, the VSC for window 25 actually increases after the proposed development. This does not make sense and calls into question the reliability of VSC as a good metric for measuring daylight. The fact that all of the windows passed the VSC test is therefore not necessarily significant.

Five residential windows, including those serving living rooms come close to failing all 3 of the BRE sunlight to window reduction limits. Two windows in 11 Pratt Mews (windows 46 and 47) and two windows in Regents House do not comply (windows 53 and 55). Although the consultant argues that these serve non-residential purposes, it should be checked that those rooms do not have a requirement for light in order to comply with the standards set out by the BRE. Using this metric, 22 windows are affected negatively in some way. Almost 60% of these windows already receive less than 25% or 5% of annual or winter probable sunlight hours respectively, so any further reduction is going to be detrimental to the wellbeing of those using and the purpose of those rooms for little to no public benefit. For example, window 63 is the only light source for our main living space in our flat. The proposed development would lead to a 16% decrease in our Total sunlight hours over the course of the year.

Finally, section 4.2.6 of the light report states that the Council's planning application process would be unfair if they do not approve the application. The Council cannot be expected to foresee all future potential developments surrounding a planning application site. The Council's task is to evaluate a proposal based on the state of the surrounding properties at that time. Right of Light Consulting are in no position to criticise the Council's process. Their argument also calls into question the credibility of the report and its measurements and is a reminder that it is clearly biased in favour of the developer.

Noise

The Noise Impact Assessment undertaken on the three air conditioning units to be placed on top of the additional storey at 10 Pratt Mews states, "We have taken into consideration the nearest and most affected noise sensitive premises that may potentially be affected by the proposed plant." However, the noise testing was only carried out in one location in between the buildings on the High Street and the buildings on the Mews. The Mews benefits from being a tranquil, residential space where conversations can easily be had during the day. Since the Noise Impact Assessment fails to

evaluate the noise pollution that the air conditioning units would cause to the Mews, their full impact cannot be properly evaluated by the Council.

Energy Rating

The current energy rating of 10 Pratt Mews is E. Despite the proposal of installing solar panels, the three air conditioning units could well tip the EPC rating into the F category, making the property unlettable. Further investigation is needed to check that this is not the case.

Overlooking and privacy

The proposed development would add three mansard windows on an additional storey. These windows would directly overlook our master bedroom/study. We feel that this decrease in privacy could significantly reduce our quality of life. The additional storey would also exacerbate the sense of enclosure already experienced by those of us facing the tall buildings.

Waste

The waste services on the Mews are already extremely stressed with the top of the Mews commonly in a dire state due to waste being left out for collection by the current businesses on the Mews. Please see the photograph in Figure 3 taken on 20 November 2024. It is imperative that any waste remains within 10 Pratt Mews until it is collected so the current waste problem is not exacerbated. The proposed plans allow space for only two wheelie bins at the back of the property, which may not be enough for the equivalent of 20 full-time employees.

Construction and Destruction Work Disruption

The planned destruction and construction works would run from February 2025 to December 2025. The Mews is a narrow and quiet street. These works would seriously hamper the peacefulness of the Mews and adversely affect the numerous businesses, charities and churches that operate on the Mews. The construction vehicles would consume the entire width of the Mews. This would make it difficult for the many parents dropping-off and picking-up their children daily from Martial Arts, Dance and Music studios. It would also disrupt the biweekly queueing outside Camden Foodbank which lasts throughout the day. Both are located on the Mews just a couple of doors up from the proposed development site. It could also restrict access to services run by the Jehovah Witness and City Church groups, particularly for those who have disabilities. The Jehovah Witness Group is located at the bottom of the Mews. The narrowness of the Mews raises safety concerns, especially for the children, as passers-by would have to walk closely to any destruction/construction works and vehicles. Furthermore, 11 Pratt Mews have a garage which they need constant access to. Overall, these works, lasting for 11 months, would cause serious disruption to the many businesses that operate on the Mews and the people who live and work here.

Character of the mews

The CTCAA (October 2007) guidance in relation to mews developments states that 'predominantly two-storey buildings give the narrow passages their special scale'. 10 Pratt Mews was identified as a positive building in the conservation appraisal for its 'strong mews character and grouping which forms part of the significance of this part of the conservation area'. Although the modern character of the mews is considered by Camden Council to be two storeys plus mansard level, the proposed development includes solar panels and air conditioning units on top of this. Also, 10 Pratt Mews is one of the few remaining two storey buildings in the Mews. If an additional mansard level was constructed, the Mews would no longer be 'predominantly two-storey' and would therefore lose its defining character. In a recent planning application refusal in relation to 8-9 Pratt Mews, the council officer stated 'it is important not to let any further height accumulate in the Mews'.

In conclusion, this planning application breaches accepted standards on multiple counts or fails to evaluate them properly with regards to light and noise. It will place strain on waste services, harm the operation of local businesses and destroy the character of the Mews. The approval of this planning application would set a precedent, paving the way for further extensions along the Mews. This would further worsen all the aforementioned problems, eventually making the area unliveable.

Thank you in advance for taking our concerns into account when adjudicating on this planning application.

Yours sincerely,
Charlotte Freeman
Lily Freeman
Adam Samm



Figure 1 View from window 63, red line showing the height of the proposed development (including solar panels)

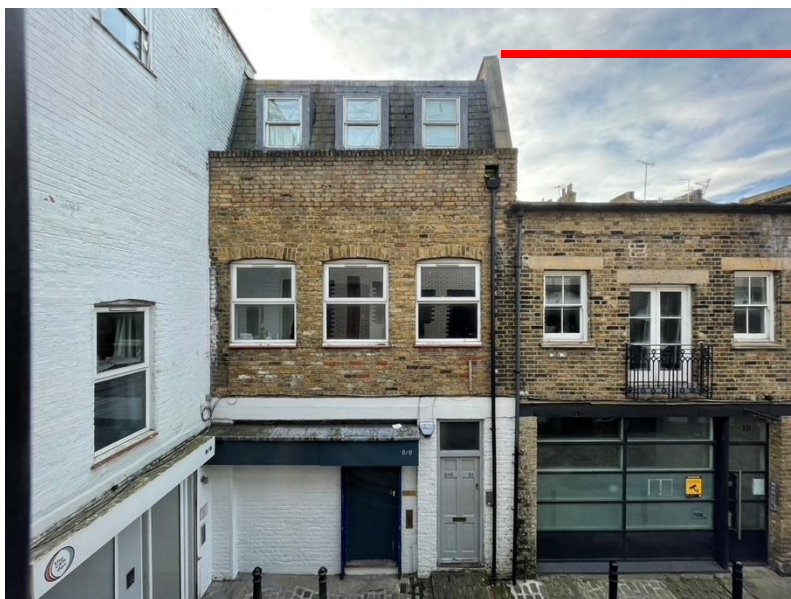


Figure 2 - View from window 62, red line showing the height of the proposed development (including solar panels).



Figure 3 – waste disposal for businesses on the Mews, at the top of the Mews