

By Email & Post

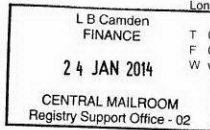
London Borough of Camden
6th Floor
Town Hall Extension
(Development Management)
Argyle Street
London
WC1H 8ND

FAO: Miheer Mehta

22nd January 2014



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Dear Sirs,

248 Kilburn High Road - 2013/7487/P

We are writing on behalf of our client, 254 Kilburn High Road LLP, to object to the above application, which is currently being considered by the Council.

As you may be aware, we are currently undertaking pre-application discussions with the Council (LBC ref 2013/6953/pre) for redevelopment of the adjoining site at 254 Kilburn High Road, looking at proposals comprising replacement commercial space at ground level, with around 60 flats above, which would include both market sale and affordable housing provision. We have attached a location plan showing the extent of our site.

We have now had the opportunity to review the application for 248 and are very concerned over the number of flats which have many habitable rooms facing north west directly into our site, set back just two to three metres from the boundary.

Our architects have prepared plans showing our proposals overlaid with the current application drawings, as attached, for first floor upwards. As can be seen, many of the proposed flats (ie B1, B2, B3, B4, B5, C1, C2, C3, C4 and C6) have windows to habitable rooms facing directly into our site, set back just two to three metres from the boundary. Some of these (ie B1, B3) would look more into the proposed parking area, but most at the proposed flank wall.

As set out at paragraph 4.25 of Camden's CPG2

"House and flat developments should be arranged to safeguard the amenity and privacy of occupiers and neighbours.

** New development, extensions, alterations and conversions should not subject neighbours to unacceptable noise disturbance, overlooking or loss of security....."*

The BRE guide also gives some helpful commentary on this at paragraph 2.3.1, saying



"from a daylighting standpoint it is possible to reduce the quality of adjoining development land by building too close to the boundary. A well designed building will stand a reasonable distance back from the boundaries so as to enable future nearby developments to enjoy similar access to daylight. By doing so, it will also keep its own natural light when the adjoining land is developed."

As you will be aware, CPG6 references the BRE document and says the Council will use guidelines and methods contained within it.

It would seem that if both schemes were approved, there would be an unacceptable impact on the outlook and daylight to a number of the flats contained within the 248 Kilburn High Road site. Given this, the 248 proposal would be unneighbourly development, which would have a prejudicial impact on our site, impacting on its efficient redevelopment and the delivery of employment space and new homes, including affordable homes, contrary to planning policies which seek to secure efficient use of land.

We realise that the window positions are similar to the previous permissions (2007/3467/P & 2009/5625/P), but these have now lapsed and can only be given limited weight. The fact we are now in active discussions with the Council about developing our site and intend to submit an application shortly does represent a change of circumstance and this issue has to be considered afresh.

We would also highlight that the submitted daylight report does not assess the light levels within the proposed flats. However, the internal light levels are contained in the Code for Sustainable Homes report as an appendix. This shows that some flats (ie B1, B2 and C1) already struggle for light, with some failures and many fairly close. Clearly this makes these flats more sensitive to development on adjoining sites.

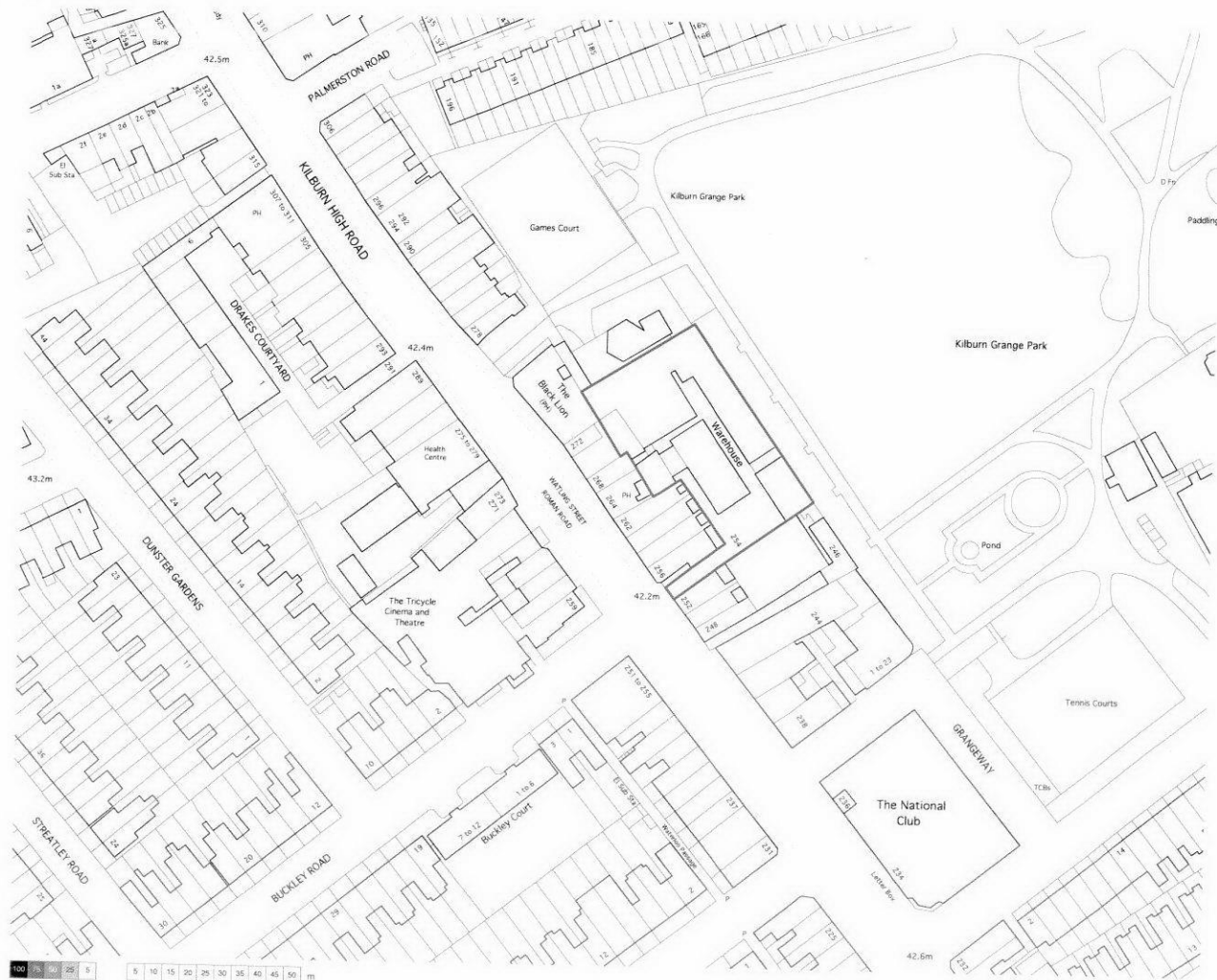
We have approached the applicants, Studio 246 Media Ltd, via their agent to discuss this issue, but it would appear this is an area we are not able to reach an agreement on. We would welcome the redevelopment of this site, but consider that it would be possible to do this in a way which does not have such an impact on our site.

As such, we object to this application on the grounds that it would be unneighbourly development, which would have a prejudicial impact on an adjoining site, impacting on its efficient redevelopment and the delivery of employment space and new homes, including affordable homes, contrary to planning policies which seek to secure efficient use of land.

We hope this is straight forward, but do let us know if you have any queries, or if the application is to be reported to Committee.

Yours faithfully,





CLARIDGEARCHITECTS

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 4 LINDSAY RD
 LONDON NW4 1EP

FOR 254 Kilburn High Road LLP

This planning application is submitted for the proposed development of 254 Kilburn High Road. The site is currently occupied by a residential building. The proposed development is a new residential building. The site is located in the Kilburn area of London. The proposed development is a new residential building. The site is located in the Kilburn area of London.

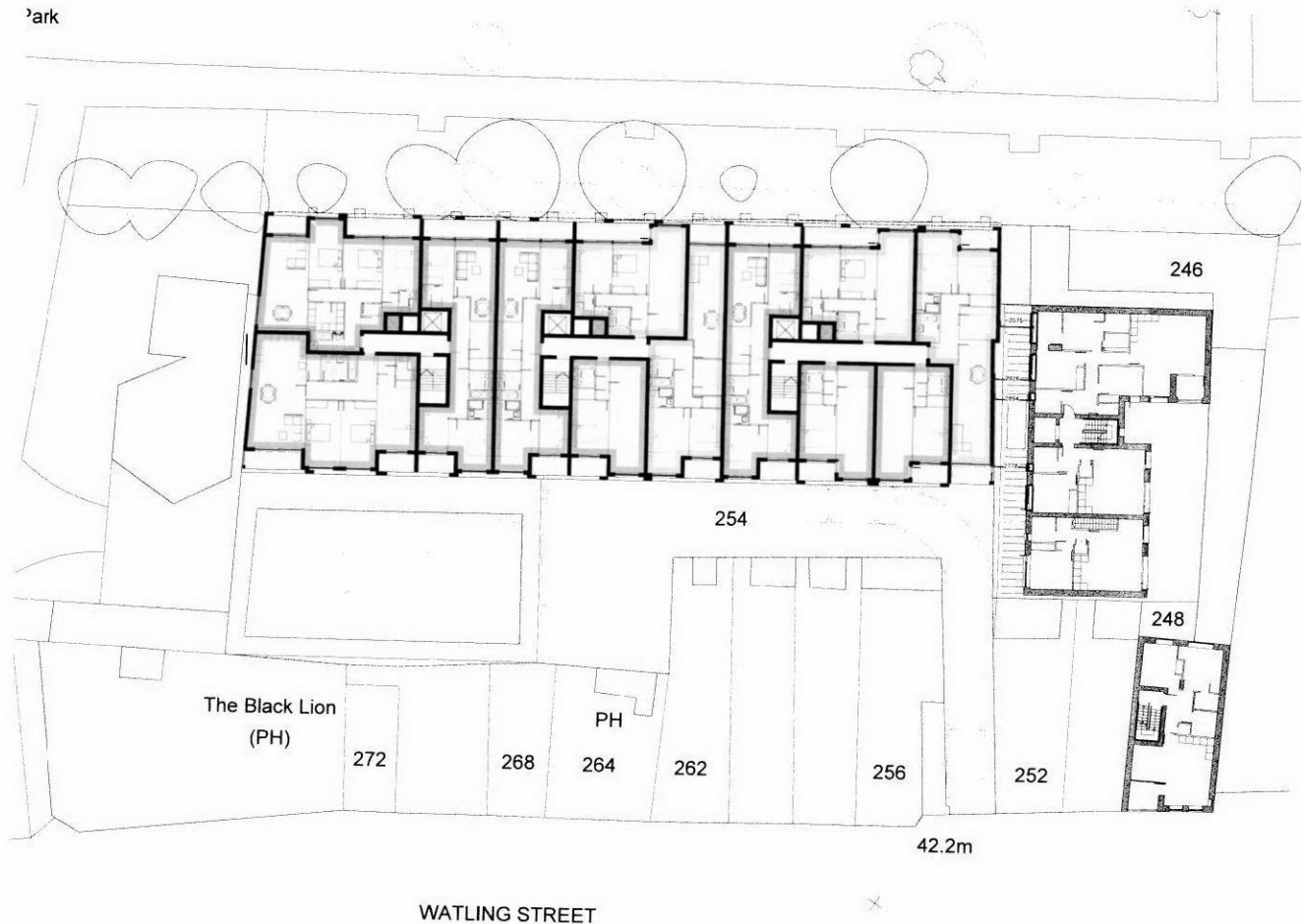
NO.	DATE	NOTES
1	10/11/12	Initial site visit and consultation with the client.
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100	25/03/14	Site visit and consultation with the client.

PROJECT 544 KILBURN HIGH ROAD
 TITLE Site Location Plan

DATE 16.11.12
 DRAWN BY A3
 CHECKED BY A3
 SCALE 1:1000
 DATE 12/04/13
 SCALE 5.00

16.11.12 1:1000 12/04/13 5.00

park



CLARIDGE

1 via 002-PHAR 002 2 via 002-PHAR 002
 # PRODUCTIONS
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Atch Group Holdings Ltd

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PROJECT 254 Kilburn High Road

TITLE Proposed First Floor Plan

DATE Pre-Planning

15.01.14 1:150 12066 GA.01

15.01.14 1:150 12066 GA.01

Architectural floor plan of a residential development. The plan shows a central row of units labeled 254, 252, 256, 262, 264, 268, and 272. To the right of unit 252 is a larger building labeled 246. Below unit 252 is a smaller building labeled 248. To the left of unit 272 is a building labeled 'The Black Lion (PH)'. A dimension line at the bottom indicates a width of 42.2m. The plan includes detailed room layouts, stairs, and landscaping elements like trees and paths.

272

268

PH
264

262

256

252

42.2m

WATLING STREET

246

248

CLARIDGE

Windsor, Ontario, Canada
N6A 1A5

Aitch Group Holdings Ltd

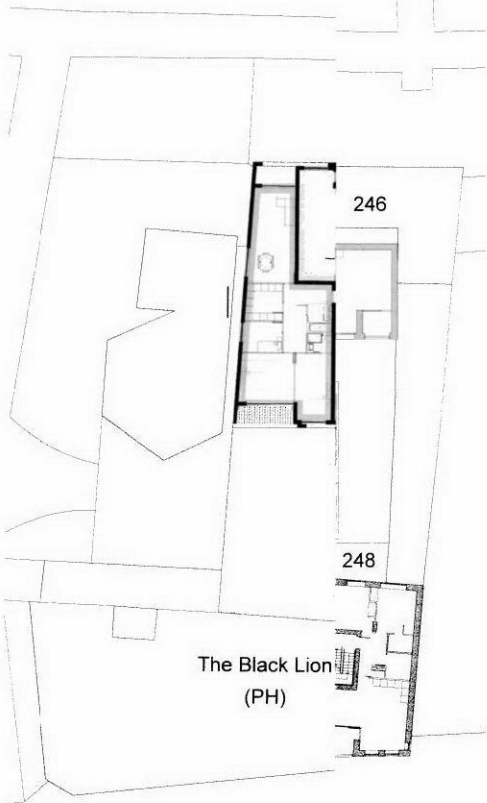
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254 Kilburn High Road
Proposed Second Floor Plan

Pre-Planning	
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15.01.14	1-150	12066	GA.02	-
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park



CLARIDGE

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For: Aitch Group Holdings Ltd

This is a preliminary drawing and is not to be used for construction purposes. It is for information only and is not to be used for any other purpose. It is the responsibility of the client to ensure that the drawing is used for the intended purpose.

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254 Kilburn High Road
 Proposed Third Floor Plan
 Pre-Planning

15/01/14 15/01/14 15/01/14 15/01/14
 B. A3 17046 DA.03

The Black Lion
(PH)

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 W: AS@BMA-ajournal.co.uk
 8 CONSCALE RD
 LONDON NW6 5RE

for Aitch Group Holdings Ltd

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PROJECT	254 Kilburn High Road
TYPE	Proposed Fourth Floor Plan
STATUS	Pre-Planning

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