


Ms Helen Stone OBE FREng BSc CEng FICE

**3a King Edward Mansions, 8 Grape Street,
London WC2H 8DY**



Regeneration and Planning
Development Management,
London Borough Of Camden,
Town Hall,
Judd Street,
London
WC1H 8ND

Attention: Mr Gideon Whittingham

January 8th 2014

Dear Sir,

9-13 Grape Street, London WC2H 8ED,
Planning Application Reference 2013/7894/P

I have considered the full planning application for the change of use of 9-13 Grape Street to provide 9 Class C3 residential units. I have strong concerns with regard to the impact on my existing amenity as a result of these proposals, in particular the proposal to extend the building to provide a further floor of accommodation.

In 2002 a similar application was dismissed at appeal (Reference PX0104247) on the grounds that the extension to the building would result in an increased sense of overbearing / enclosure and loss of light, privacy and outlook for the adjacent properties.

Whilst I welcome the changes that have been put forward in these proposals which have resulted in a reduced scheme I still consider that the scheme will have an unacceptable impact upon my amenity and this is contrary to the requirements of Policy CS5 of your adopted Core Strategy which requires that *"development protect and enhance the amenity and quality of life for local communities"*; that of Policy DP26 of your Development Plan policies; and the guidance in CPG6.

I set out below the reasons for my concerns.

1. LOSS OF AMENITY - OVERLOOKING

My flat, 3a King Edward Mansions, looks out to rooftops and the Travelodge building. Until now I have enjoyed privacy through my windows being higher than those of the property opposite at 9-13 Grape Street.

My concern is that with floor to ceiling windows, the new 4th floor apartment at 9-13 Grape Street will afford a view right into my flat, and will also afford a view for me effectively right up the skirts of people in that flat.

I note that Camden Planning Guidance Document 6, Clause 7.4, states the following:

“WHAT IS GOOD PRACTICE?

To ensure privacy, there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. This minimum requirement will be the distance between the two closest points on each building (including balconies). “

The distance between my windows and those of the proposed residential development is 7.0-7.5m, which is less than half of the recommended distance between residential properties. I assume the narrowness of Grape Street explains the reason why until now, for almost the whole length of the street, offices have faced residential properties, and vice versa. The proposed change of use at 9-13 Grape Street will completely change that pattern. I therefore have serious concerns about the planning application.

In the event that the development is permitted, I have suggested to the applicant to make the windows start from say 1m above floor level, but he refused on architectural grounds. Having considered the information as provided as part of the application submission I consider that it is possible that the design of the windows cannot be changed to protect my privacy as they will not deliver the internal daylight standards to the new flats required under policy guidance.

The applicant has mentioned the possibility of a treatment to the glass to help address the problem I have outlined, but I do not see firm proposals in the planning application. He may have good intentions, but it would be preferable from my point of view for a condition to be imposed so that future occupants would not be able to install clear glass from floor to ceiling.

I appreciate that the applicant has taken certain steps to mitigate my loss of daylight and sunlight, and that these have included moving the front face of the 4th floor back from the street by about half a metre, but I remain concerned about overlooking and my potential loss of privacy if this development is implemented.

2. DAYLIGHT AND SUNLIGHT, INCLUDING REFLECTED LIGHT

The applicant has copiously addressed the question of daylight and sunlight in his application and I note that the methodologies as prescribed by BRE have been followed. I also note that in the LB Camden supplementary planning guidance on Amenity paragraph 6.5 states *“while we strongly support the aims of*

the BRE methodology for assessing Sunlight and Daylight we will review the results flexibly and where appropriate we may accept alternative targets."

On this basis I wish to raise queries with you with regard to the findings of the applicant's report. Whilst he asserts that King Edward Mansions, where I live, will benefit from light reflected off his new 4th floor, I remain unconvinced as outlined below.

At present, I benefit from light reflected from the Travelodge building situated on High Holborn. The new 4th floor at 9-13 Grape Street will involve raising the roof level and therefore obscuring part of the reflecting building when viewed from my flat. Light reaches the Travelodge from above the level of King Edward Mansions, and it is reflected down into my flat. I fail to understand how light will reach and be reflected by the new 4th floor into my flat opposite. To me, such a suggestion defies the laws of physics, since I believe that King Edward Mansions will itself put the 4th floor face opposite my flat in the shade. There is also little indication as to what materials will be used for the 4th floor, and hence how reflective they will be.

I would be grateful if you could please consider these proposals in light of the comments as set out above and I look forward to receiving your response in respect of this matter.

Yours faithfully

Helen Stone