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28A Hatton Wall
London, EC1N 8JH

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

Attn: Neil Collins

Ref: Application 2014/5873/P

29th October, 2014

Dear Sirs:

OBJECTION TO PLANNING APPLICATION 2014/5873/P

We write in respect of Planning Application 2014/5873 (the "Application") in respect of the demolition and rebuilding and extension of 18-26 Hatton Wall (the "Proposed Development") as the resident leaseholders of Flat 3, Hatton Wall House, 28A Hatton Wall, which occupies the third and floor floors of the adjoining building to the west of the proposed development ("Flat 3"). Flat 3 is marked in yellow in the attached plans submitted with the Application in hard copy by post.

By way of background, Hatton Wall House is situated on the same freehold as proposed development; however, the freeholder converted the building into three residential units which were sold to the current leaseholders in early 2013.

Our objections to the Application are threefold.

1. Failure to submit a satisfactory daylight and sunlight report

Planning Guidance 6 (Amenity) (the "Amenity Guidance") states that the "Council will require a daylight and sunlight report to accompany planning applications for development that has the potential to reduce levels of daylight and sunlight on existing and future occupiers, near to and within the proposal site." (p.32)

While a daylight and sunlight report dated 29 August 2014 conducted by MES Building Solutions was submitted with the Application, the report omitted consideration of the impact on Flat 1, Flat 2 and Flat 3 of Hatton Wall House. As the Application has failed to meet this Camden Local Area Requirement for Planning Applications, it should be rejected.

2. Significant loss of residential amenity.

DP26 states that "[t]he Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity," and as further explained in the Amenity Guidance (para. 7.9):

> When designing your development you should also ensure the proximity, size or cumulative effect of any structures do not have an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers. (p.38)

A significant contributor to the residential amenity of Flat 3 is the penthouse balcony that faces the courtyard and west elevation of the Proposed Development. As the existing building is only slightly higher than Hatton Wall House, an additional two floors in such close proximity to this balcony will have an oppressive and claustrophobic effect and causing significant detriment to amenity of this feature.

3. Failure to protect the privacy of existing dwellings

The Amenity Guidance states (para. 7.4):

> Development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. Spaces that are overlooked lack privacy. Therefore, new buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking.

The Proposed Development entails the extension of the site by two further stories—two stories higher than any other building on Hatton Wall—with full balconies wrapping around both stories on the elevation facing Flat 3.

The Amenity Guidance (p.37) states:

> 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).

Whilst the balcony of Flat 3 is perpendicular to the side of the Proposed Development, the distance between the two buildings is significantly less than 18m (estimated at less than 6 metres). Note that this loss of privacy would not only be also suffered by Flat 3, but also by the units on Leather Lane with windows directly facing this elevation of the Proposed Development.

While recognising that the current plans for the Proposed Development attempt to mitigate this loss of privacy by the inclusion of perforated screens, the approximately waist-high height of the proposed screening only serves to partially obstruct views into the newly proposed residential units, and leaves Flat 3's balcony and the living area behind visible through the large sliding windows completely exposed.

In combination with the extreme lateral proximity and the extension in building height by two stories towering over the existing roof line as experienced from properties facing the courtyard, this is an unacceptable loss of privacy and amenity to Flat 3.

Conclusion

We hope that the reasons that the Application must be rejected are manifest.

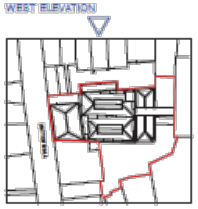
However, notwithstanding the considerable and prolonged inconvenience and disruption that the demolition and reconstruction of the site would entail, we would like to clarify that we are not categorically opposed to any redevelopment of the site. Rather, we are asking that the Application be amended to rectify the contraventions of Camden planning guidance identified herein, namely by way of:

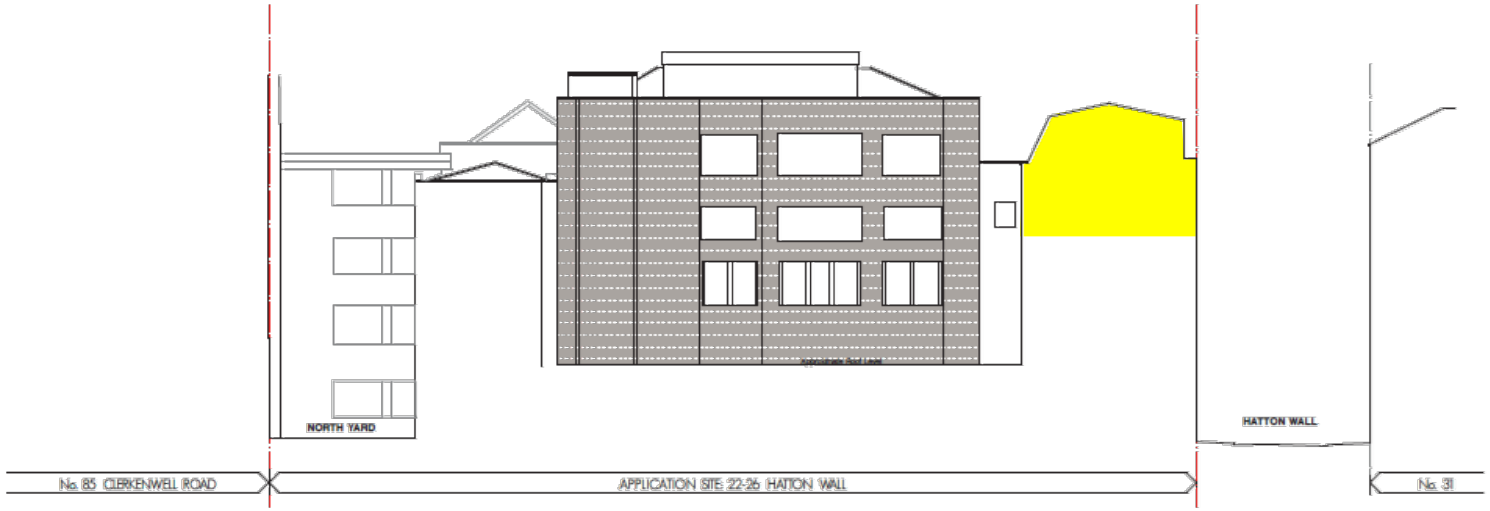
- Submission a satisfactory daylight and sunlight report that satisfies the Camden Local Area Requirement for such by assessment of the flats in Hatton Wall House
- Revision of the plans for the Proposed Development to ensure preservation of Flat 3's residential amenity and privacy. Having studied the current plans for the Proposed Development, we struggle to imagine how any adjustments to the proposed two story extension of the building, apart the extension's complete omission, might mitigate these issues in an acceptable way.

Thank you for your consideration.

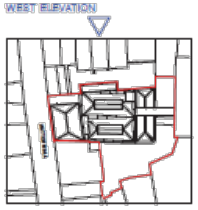
Yours sincerely

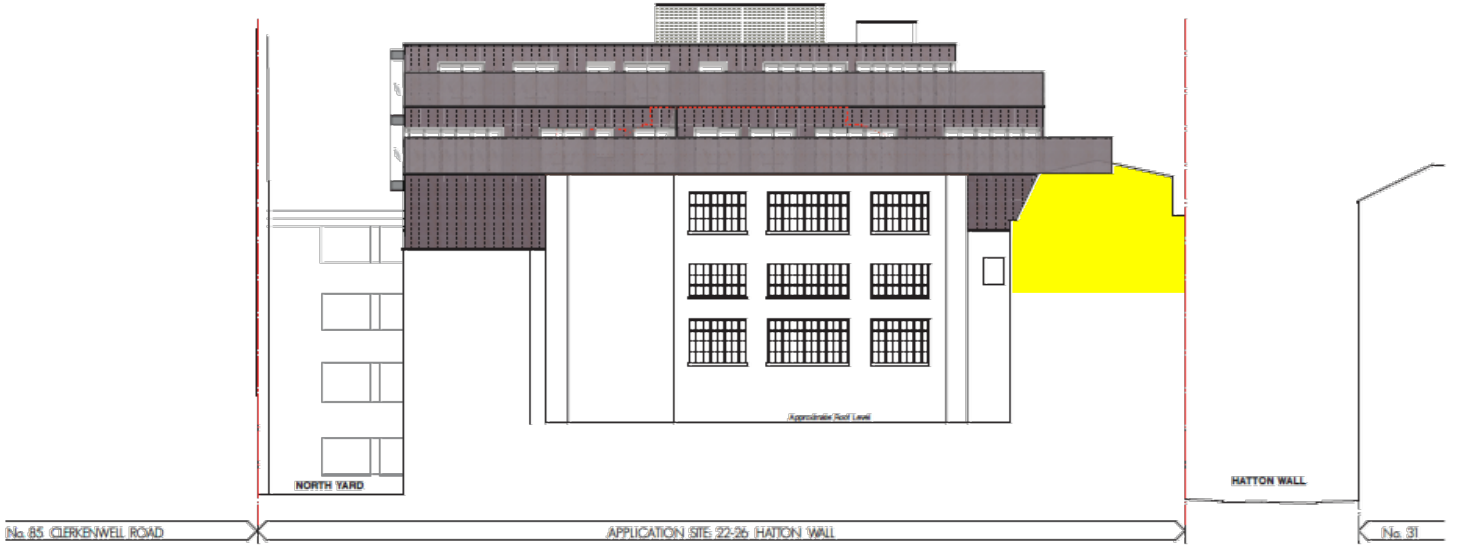
Laura Kimmel and Michael Werner





Rear Elevation





Rear Elevation

Flat 3, Hatton Wall House