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CHARTERED TOWN PLANNERS

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Development Management
LB Camden
Town Hall
Argyll Street
London
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Our ref: 7108

FAO Rob Tulloch

20 May 2016

Dear Mr Tulloch

Planning Application ref: 2013/3383/P – 62A Grafton Terrace NW5

I am instructed by Ms Caroline Leaf of Flat 3, 4 Southampton Road in connection with the above matter.

I previously submitted objections to the application in our letters of 22nd November 2013 and 16th February 2016. This letter should be read as an addendum to those previous letters.

Sunlight/Daylight

The revised Daylight & Sunlight Study (21 April 2016) does not show any major amendments from the previous version (21 January 2016). There has been no change to the application drawings, except for a belated acknowledgement that there is a significant level difference between Grafton Terrace and Southampton Road (although this difference is not actually quantified).

As might be expected, the change in level has worsened the calculation of the existing situation in the sunlight/daylight assessment for rear facing windows in the properties in Southampton Road, particularly at lower levels.

Updating the window comparison table in our earlier letter, a summary of the situation is as follows:

Vertical Sky Component

Window	Room Use	Before	After	% Decrease	Relative Loss
17	Living Room	16.4%	12.9%	3.5%	21%
18	Kitchen	32.4%	28.0%	4.4%	13.5%
20	Kitchen	7.3%	5.9%	1.4%	20%
21	Kitchen	17.9%	15.0%	2.9%	16%
28	Kitchen	21.1%	19.9%	1.2%	5.5%



Total Sunlight Hours

Window	Room Use*	Before	After	Loss	Relative Loss
17	Living Room	20%	12%	8%	40%
18	Kitchen	42%	31%	11%	26%
20	Kitchen	6%	3%	3%	50%
21	Kitchen	15%	7%	8%	53%
28	Kitchen	28%	23%	5%	18%

** In these converted flats in Southampton Road, the kitchens comprise principal living spaces. For instance, at No. 6 Southampton Road, the kitchen has been opened to be an open plan living/dining/kitchen occupying the whole floor. Consequently, maintaining the existing levels of daylight to these south-facing windows is critical to the residents' well-being.*

The important consideration here is the extremely low levels of light that the affected windows already experience. A decrease in VSC of between 1.1% and 3.5% may appear on the face of it to be acceptable, but when it is acknowledged that those windows currently experience a very limited outlook, any reduction in light will represent a serious loss of amenity to the residents.

Looking at the total sunlight hours, a reduction of between 18% and 48% in the amount of sunlight penetrating the flats will be very keenly felt, particularly when in most cases, no winter sunlight can be seen.

On that basis, a further reduction in the level of natural daylight reaching these windows should not be permitted, in the interest of the residents' well-being.

To summarise, notwithstanding the statistical analysis set out in the Sunlight and Daylight Study, I consider that the proposed development is contrary to the requirements of Policy CS5, Policy DP26(c) and CPG6 in that the reduction in the levels of daylight and sunlight experienced by the residents of the adjoining properties will be severe, thereby causing actual harm to residential amenity.

Overbearing Impact

I note that the applicants have finally accepted that there is a significant difference in levels between Grafton Terrace and Southampton Road.

The level difference is now reflected in the amended drawings, (but I note that the actual difference is only estimated, rather than measured on the ground). The amended drawings only serve to illustrate the extreme sense of enclosure that will occur as result of the erection of the proposed dwelling. The proposed section – *drawing 010 rev 10* – graphically illustrates that highly unsatisfactory situation.

Therefore, the proposed development remains contrary to the requirements of Policy CS5, Policy DP26(b) and CPG6, and my client's previous objection in respect of the overbearing impact of the proposed extension is maintained.



Loss of Privacy

There has been no change to the design and external appearance of the proposed building. Therefore, the proposed development remains contrary to Policy CS5, Policy DP26(a) and CPG6 and my client's previous objections on the grounds of loss of privacy to habitable rooms and private rear garden areas is maintained.

Residential Amenity

There is no private amenity space for the occupants of the new property, which confirms the inherent unsuitability of using this extremely cramped urban site for a 2-bedroom family dwelling. As such, it fails to satisfy the requirements of Policy DP26(k), as interpreted in CPG2 [para 4.29].

Summary

On the above basis, I conclude that the application should be refused on the grounds that it is contrary to the relevant requirements of LB Camden Policy DP26 and CS5, as interpreted by CPG2 and CPG6, by reason of:

- a) the unacceptable reduction in the level of natural sunlight/daylight reaching habitable rooms in the immediate neighbouring residential properties;
- b) a material loss of privacy for those adjoining residents;
- c) the dominant and overbearing impact of the new dwelling; and
- d) the lack of private amenity space for the occupants of the proposed dwelling.

Yours sincerely
BELL CORNWELL LLP

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