


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

By email

28th July 2016

Dear Sirs,

PLANNING APPLICATION CONSULTATION

Erection of roof extension and change of use at 9-13 Grape Street, WC2H 8ED
APPLICATION REF.:2016/2036/P, including revisions notified on 7th July 2016

Thank you for your letter advising that a planning application has been received for work to the above property, and inviting comment on the application so that my views may be taken into consideration before the application is decided.

My comments remain the same as my letter of 19th May 2016, and are reproduced here for London Borough of Camden's convenience.

Opening statement

I am the leaseholder and resident at 3a King Edward Mansions, directly opposite the proposed development. I have lived here since 1987. Grape Street is normally a peaceful haven between the busy streets of Shaftesbury Avenue and High Holborn. My living rooms (sitting room and dining room) currently look out over sloping roofs, and enjoy direct sun in the morning and sunlight reflected from the Travelodge building behind the proposed development in the afternoon and evening.

I welcome the proposal for the premises at 9-13 Grape Street to be used for offices as opposed to the previously proposed residential use, due to the very narrow street affording only 7metres between 9-13 Grape Street and King Edward Mansions opposite. Office use should afford residents of King Edward Mansions respite from overlooking, and privacy at weekends and in the evenings and overnight, as long as it is sensitively implemented.

However, I object to specific aspects of the proposals, in particular the extension to create a new 4th floor. This would have a permanent adverse impact on King Edward Mansions were it to be constructed, and a very considerable adverse impact on the whole of Grape Street lasting over a year during construction.

The 4th floor extension is inappropriate because the demolition of the roof and the new construction work will create massive disruption, noise, dust, heavy traffic and temporary works problems and hazards in a tiny street. The extension would also block reflected sunlight to parts of King Edward Mansions from the reflective Travelodge building, and the 20m high temporary roof will block light generally and darken the street and most properties in it during the construction period.

The Construction Management Plan appears unworkable and unsafe, as will be explained, and fails to demonstrate the feasibility or safety of using Grape Street as the only access to the construction site.

The use of fritting as proposed has not been proven to provide protection to residents of King Edward Mansions from office lighting nuisance nor overlooking. The treatment of windows should be reconsidered.

I contend that a more appropriate and workable redevelopment for this location would provide for offices up to 3rd floor level, and omit the 4th floor extension, in order to reduce the scale and difficulty of construction in this very confined location.

Background

A series of planning applications for this site have been made over the last 15 years.

The current application contains many features seen previously, such as the Construction Management Plan, elevations which include a new 4th floor, and fritted glass in the windows.

Further information and concerns

Residents of King Edward Mansions will be only 7metres away from these offices. We do not know what type of businesses will be in occupation, but nuisance from electric lights seems inevitable given the current proposals for clear glass areas measuring 1.9metres wide by 1.1 metres high in the large windows across the full width of the frontage and extending over every floor. I request that conditions should be applied to the planning consent, to limit the nuisance from office lights, such as the required use of blinds and turning off the lights at the end of the working day. There is also a history of noise nuisance when the premises were previously used as a dance studio. Again, the planning

consent should limit noise emissions. Residents have complained about frequent noisy late night packing of vans at the adjacent "Icetank" business at 7 Grape Street, which can go on until 11.45pm.. If such business extends into 9-13 Grape Street, we would look to Camden Council to limit these activities to more civilised hours so that residents can sleep at night.

I object to the proposed extension works on the basis that, in the final as built condition, I anticipate loss of privacy, overlooking, loss of reflected light, and potential for noise nuisance. Furthermore, the change of glazing throughout, apparently with no blinds or net curtains, is likely to cause nuisance to our flats due to office lighting, and cause loss of privacy and loss of outlook.

During the proposed construction programme, which is of unspecified duration, but we estimate at least one year, there will be extensive impacts. These include: loss of privacy, overlooking, loss of sunlight and reflected daylight in the flats and street, due to the 20m high temporary roof above the whole construction; demolition and construction noise, dust, dirt, plant fumes, danger to pedestrians from heavy vehicles, disturbance due to site lighting, risk to the security of our building, potential for street dwellers and junkies to occupy and foul the street within and around the scaffolding, restricted access for deliveries and pedestrians (including residents) due to road closures and loading and unloading operations, potential damage to our building's listed façade and windows, potential danger of the complete collapse of the scaffolding due to vehicle strikes, and inevitable damage to the pavement due to traffic movements. Because of the proximity of the site, only 7 metres from our windows (and immediately adjacent to the 1st floor windows of King Edward Mansions) it will be like living in a dirty, noisy construction site for the duration of the work.

It is my contention that the scale of the proposed works is inappropriate and excessive in this extremely narrow street where access to the site is difficult and restricted. The proposed works will cause untold stress, disruption and intrusion to residents and businesses during the programme of demolition and construction; will cause a permanent diminution in quality of life for the residents in King Edward Mansions, and will be detrimental to the businesses in Grape Street, all for the sake of creating a new 4th floor office space, apparently adding only 124 square metres to the total floor area.

A modified design omitting the roof extension should involve a considerably easier, quicker, safer and less intrusive construction operation.

Issues of concern connected with the proposed final as-built condition include:

- A new 4th floor is planned as an extension, and will not be entirely contained within the current roof envelope, contrary to certain claims in the application, but would project higher than the current roof ridges at the south end by an amount which it is not possible to determine from the submitted drawings, and would also fill the triangular space above the currently sloping roof adjacent to Queen Alexandra Mansions. Any

increase in height at such close quarters to the windows of King Edward Mansions will block some of the sunlight currently reflected into the upper floors of King Edward Mansions by the tall, white, reflective Travelodge building behind the proposed development., and the infill of the triangular area mentioned will block a view of sky. Despite a daylight and sunlight report, this aspect has been ignored.

- Fitting of the new windows has been proposed to mitigate loss of privacy, but its extent is partial and limited to the upper and lower edges of each large window panel, and still would allow views into, and overlooking between, the opposing rooms. The dimensions of the clear glass areas of each large window are approximately 1.9metres wide by 1.1metres high. No effort has been made to demonstrate its efficacy in practice despite residents' requests, over the years since the idea was first mooted, for a mock up panel to show the effect from within King Edward Mansions and from within 9-13 Grape Street. Previous office use took place behind net curtains. Fitting is discussed further below.

Issues of concern connected with the demolition and construction include:

- The Construction Management Plan (CMP) fails to demonstrate a safe and workable method of achieving the construction
- Proposed use of a truck mounted mobile crane standing in Grape Street, to unload lorries, would block access for fire appliances and endanger the theatre and other properties in the event of a fire
- Weak pavement above basements on the west side of Grape Street could collapse under loads from crane supports, lorry loading or gantry loads
- Not feasible for lorries 14m long, as mentioned in the CMP for general deliveries, to turn into the northern end of Grape Street
- Overlooking into flats by site operatives and loss of privacy
- Loss of light to flats and street because the height of the temporary roof over the whole construction would be significantly higher than the existing roof level (the scaffolding would be 20m high)
- Demolition, removal and loading noise
- Dust from demolition
- Dirt from demolition
- Plant fumes (particularly compressors)
- Construction noise generally
- Construction noise from use of the proposed gantry across Grape Street causing working within 1-2metres of King Edward Mansions' first floor windows
- Grape Street exhibits a "canyon effect" due to the tall buildings and narrow width which makes noise reverberate along the street, so the effect of all noise will be increased
- Danger to pedestrians from heavy lorries (6 per day) plus other heavy goods vehicles, but with limited pavement area
- Incompatibility of heavy lorry traffic with the 5 parking spaces outside the Cuban Consulate and Embassy at the south end of Grape Street,

particularly in light of the Stage Door of the Shaftesbury Theatre being close by, so that theatre staff making an exit will be in real danger of emerging into the path of a heavy goods vehicle

- Site lighting keeping residents awake at night
- Scaffold alarms going off at night and waking residents
- Risk to the security of King Edward Mansions, especially first floor flats, where access could be gained by intruders climbing the gantry scaffold which would be situated on the west pavement adjacent to the building
- Scaffolding on both sides of the street (supporting a gantry over the street) providing an invitation to street dwellers and junkies to gather and disturb residents, foul the street, etc.
- Restrictions on access to all Grape Street addresses due to heavy demolition, construction activities, deliveries of heavy site materials, road closures
- Potential damage to the listed façade of King Edward Mansions, due both to the planned drilling and securing the gantry scaffold supports to the façade (an assumption as the drawings and description mention drilling but fail to make it clear where drilling is proposed), and any accidental spillage of debris or falling materials hitting the façade (most likely to occur during loading of lorries to remove demolished materials and when lifting in new steelwork) including potential to break windows
- Potential collapse of the whole scaffold due to vehicle strikes of the unprotected stanchions on the King Edward Mansions side (presumably there is insufficient road width to accommodate wide vehicles plus baulk timbers on both sides of the street, otherwise it is assumed they would have been shown on the Construction Plan drawing)
- Anticipated damage to pavements when lorries mount the kerbs which already occurs at the south end of Grape Street when vans ride the pavement to get past the Cuban Embassy cars, but will be much worse with heavier loads and high frequency of occurrence

Issues of concern connected with the presentation of supporting documents by the Developer's team include:

- A Planning Statement which is highly selective in what it reports and in its conclusions, and fails to acknowledge the key planning failures of the development which will be explained below. I can not agree with the overall finding that the development meets the Camden development plan
- Misleading material referring to consultation with residents, but which fails to make any mention of issues and concerns raised, such as demonstrating the efficacy of fritting, the lack of information on construction planning, unsafe working proposals, and concerns about office lighting at night.
- Inaccurate statement that there are double yellow lines the length of Grape Street; in fact there are 5 parking spaces reserved in Grape Street for the Cuban Embassy and Consulate, and the construction proposals make no mention of their removal

- Inclusion in the planning application of outline design plans for minor modifications to my own flat which were never implemented (I fail to understand why the Developer felt these were worthy of inclusion in support of his own planning application in the first place)
- I have been unable to find anything in the documentation to address fire safety and means of escape.. At King Edward Mansions we have rear balconies leading to an external rear fire escape. The configuration at 9-13 Grape Street prevents this, so it would be helpful to understand how the occupants would escape if the front entrance was impassable.

Issues of concern connected with the technical data and professional reports supporting the application include:

- Townscape, Heritage and Visual Impact Assessment
At page 17, paragraph 6.7, a brief statement is made referring to the implications for King Edward Mansions (hidden in the section headed Sovereign House):
“The subtle work proposed at No. 9-13 Grape Street will not harm this building or its setting. The roof-top proposals will be visible from its upper floors, but its design quality will make this a prospect of greater architectural richness than the currently subdued roof. The more interesting foreground will reduce the ugly impact on this prospect, of the Travelodge Hotel in the distance.”

In my opinion the work will indeed harm the amenity of King Edward Mansions, due to the added height of the extension blocking reflected light from the Travelodge Hotel, obscuring sky, and causing overlooking.
- Construction Management Plan
At page 7, paragraph 2.6, it is indicated that insufficient appraisal of the building has yet been done to specify whether or not the upper floors will need to be replaced by a steel structure. This uncertainty means that the extent of the project is vague and the duration unpredictable.
- CIL Questions Form
At page 3, it is claimed that the building was occupied for its currently approved use for 6 months of the last 36 months. It also states that the last date of such occupation was “early 2013”. Since the date of the form is April 2016, the statement made appears to be incorrect, because the last 36 months goes back to early April 2013, making it impossible to include 6 months of use if the *last* use was in “early 2013”..

Discussion of concerns regarding fritted glass

Fritting

The argument promoting the effectiveness of fritting in safeguarding privacy, included in the Design and Access statement at 7.03 about the drawing showing an overlay of the King Edward Mansions window locations on to the façade of 9-

13 Grape Street, is specious in my opinion. It relies on occupants not only looking straight ahead out of their windows, but also limits their aperture of sight to the width and height of the window they look out from, which is not the case when the distance across the street is 7m-8m. The human eye gathers a width of several metres even when looking straight ahead across 7m, so the argument collapses. Add the movement of the eyeball plus the swivelling of the head of a curious viewer, and the argument becomes ridiculous.

The drawing of the windows arrangement prepared by the Developer's team demonstrates the sensitivity of the overlooking and privacy issue, because it shows that the 3rd and 4th floor flats in King Edward Mansions have never previously been overlooked by the windows of 9-13 Grape Street. The overlooking is brought about by the proposed 4th floor extension. The living room and dining room of Flat 3a and all of the Grape Street frontage rooms of Flat 3b will be overlooked if the 4th floor extension is built; and the Grape Street frontage rooms of Flats 4a, 4b, and 4c will also be within clear view.

There has been no response to residents' requests made over 2 years ago for a mock up to demonstrate the fritting in situ, which I suggest could be done by placing fritted panels inside the present windows.

Consideration should be given to require blinds and/or or net curtains to cover the transparent glass for privacy, and to help obscure the office lights.

REQUESTS

Please advise me of the date of any hearing of this planning application as I would like to attend.

Please also advise me of any changes or additional information provided by the developer's team prior to a hearing.

Thank you.

Yours faithfully

Ms Helen Stone OBE FEng BSc CEng FICE

HS/28.07.16/Camden