

Ms Laura Hazelton
Planning Officer
Planning and Borough Development
London Borough of Camden

22 August 2019

Dear Ms Hazelton,

**Planning Application Reference 2019/3565/P
20-23 Greville Street, LONDON EC1N 8SS (the "Property")**

We are instructed by Castlechain Directors Pension Trustees who represent the owners of the properties know as numbers 1 and 7 Bleeding Heart Yard & 19 Greville Street. 7 Bleeding Heart Yard is the adjoining building to the Property to the south east [and which is shown edged green on the attached plan].

This application seeks to vary condition 2 of planning Permission reference 2018/0910/P.

We **OBJECT** to this application for the following reasons:

1. **Access to the Development**

Policy C6 of the Camden Local Plan "Access for All" states that:

'we will:-

- b) expect facilities to be located in the most accessible parts of the borough*
- c) expect spaces, routes and facilities between buildings to be designed to be fully accessible*

It goes on to say that:-

"The Council will expect improvements for all pedestrians including disabled people to ensure good quality access and circulation arrangements, including improvements to existing routes, surfaces and footways."

It appears to us that there is some conflict between what this application seeks to achieve and the Local Plan Policy.

The footway into Bleeding Heart Yard is well below the absolute minimum recommended for inclusive mobility access (DfT 2002 Inclusive Mobility) which recommends a minimum of 1500mm to allow a wheelchair user and a walker to pass one another, and an absolute minimum of 1000mm at pinch points, where there is an obstacle. Camden's own Highways design guide recommends a minimum of 1800mm width. As the road is paved with very uneven historic granite setts, restored in 2007 using Camden and Historic England funds It is not possible for wheelchair users or those using pushchairs to use the road instead.

The submitted drawings give an inaccurate representation of the width of the pavement, which cannot be widened without reducing the roadway to below the width required for emergency vehicles.

All the upper floors of the proposed development are accessed from the alley into Bleeding Heart Yard and the accessibility constraints along the alleyway provide inadequate accessibility to the building, notwithstanding the accessible facilities within the building itself or immediately outside its entrance. The siting of the new entrances at the rear of the building does not comply with the

policy (b) above and instead of requiring 'improvements for all pedestrians', this proposal reduces the current provision in terms of access to the existing building.

The design should be revised to provide access to all major parts of the building from Greville Street.

2. Adverse effects on adjacent local business

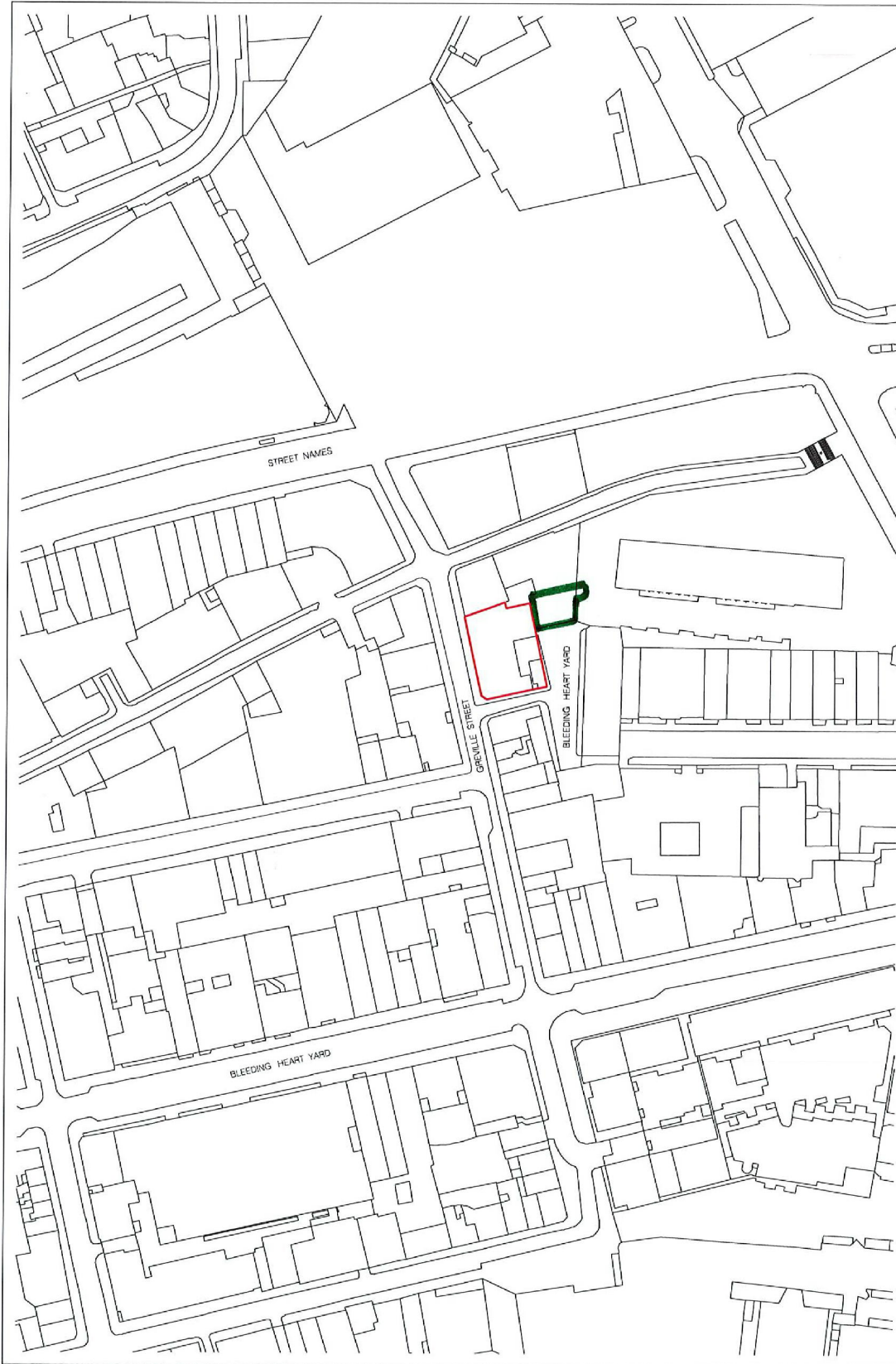
The proposed steps between Bleeding Heart Yard and the colonnade abut the area of the Bleeding Heart Bistro Terrace, which operates an outside seating area under licence from Camden Council. The unguarded steps would constitute a hazard to those using the Terrace and it is suggested that a glazed balustrade would perhaps be more appropriate in this position. We are also concerned that the colonnade could be used as a smoking terrace, both for the new restaurant and for the offices above. This would conflict with the use of the Bleeding Heart Bistro Terrace, which operates a no smoking policy.

We ask that the application in its current form is **REFUSED** by the Council.

Yours sincerely



Caroline Wilson RIBA MA Cantab.
Urbanomics Ltd



① LOCATION PLAN

NO.	DATE	BY	SCALE	PROJECT NO.	LOCATION PLAN	DATE	BY	SCALE	PROJECT NO.	LOCATION PLAN
1	08.12.2018	AC	1:1000	248 - 095	20 - 23 GREVILLE STREET, LONDON EC1N 8SS	JAN 2018	AC	1:1000	248 - 095	20 - 23 GREVILLE STREET, LONDON EC1N 8SS
GROUPWORK 100% (100% OF THE TOTAL PROJECT VALUE)						20 - 23 GREVILLE STREET, LONDON EC1N 8SS SEAFORTH LAND HOLDINGS LTD				