

The Vicarage
59 Birkenhead Street
London WC1H 8BB

Edward Hodgson
Planning
Camden Council
5 Pancras Square
London N1C 4AG

edward.hodgson@camden.gov.uk

2 February 2025

Dear Mr Hodgson,

Proposed redevelopment of church at 58a Birkenhead Street, 2024/5792/P

We are the owner-occupiers of 59 Birkenhead Street. This is the Vicarage that was originally built with the church, which shares a large wall with it, and which is itself a Grade II listed building.

We think the Methodist Church is a good thing in our increasingly atomised society. We admire its decision to reach out to the Chinese community in London. Despite the enormous disturbance to our lives that has to be expected during any construction, we therefore support redevelopment of the church in principle. However, the proposal presented comes at real cost to many of our amenities.

0. Summary of main objections

The lack of railings on the Birkenhead Street side is an invitation to substantial anti-social behaviour and criminality on our doorstep.

The Birkenhead Street frontage is too big and domineering.

At the back of the house, we are being asked to bear increased overlooking, enclosure on three sides, loss of light, loss of sunlight, loss of privacy and loss of views – partly from an unnecessary parapet on the north side.

The machinery on the roof will bring noise and smells that will disturb our sleep and deprive us of the tranquillity we currently enjoy in our outside space; much of it may be unnecessary if a determined attempt is made to rely on passive cooling. Our sleep is systematically treated with less care than that of the residents of the church.

In addition, we are baffled by the Basement Impact Assessment and request clarification.

1. Basic purpose and scale of the redevelopment

It seems to us that the redevelopment has three purposes: *congregational*, *Methodist* and *commercial*:

- The congregational purpose is to provide an improved venue and facilities for the congregation that worship at the church. Today, that is the Chinese community across London as a whole. Thus, to the extent that the redevelopment has a community focus, that community is London-wide rather than local.
- The purpose of the larger Methodist Church as a whole is reflected in the extensive meeting spaces provided. Again, these seem to serve a purpose that is primarily not local, nor even congregational, but London- or even nation-wide.
- The commercial purpose is reflected in the income to be derived from the cafe and the expanded student accommodation, notwithstanding the possibility that these aspects may also serve the other purposes as well.

So this is not a proposal that aims simply to create a modern church for a local congregation. All its objectives are larger and these are reflected both in the largeness of the proposed edifice and, regrettably, a lack of concern for the immediate surroundings.

2. The Birkenhead Street frontage

Looking at the drawing of the eastern elevation, our own Grade II home, like those on the other side, seems dwarfed by the proposed church frontage. This is not a church that seeks to share the feeling of the surrounding buildings, as the original church shared its feeling with our home. It starts at the very top of its neighbours and goes up. We feel the home that we love is diminished. Therefore, we object to the domineeringly large frontage on Birkenhead Street.

The proposal includes removal of the existing railings. For our day-to-day life, this is alarming and, the larger purposes dominating, seems to reflect a complete absence of concern for other residents and users of the street.

Birkenhead Street is routinely used for drug dealing and drug taking, street parties with alcohol, urination and defecation along with associated anti-social behaviour including invasion of property, harassment and littering. As a matter of noise, we are disturbed, day and night, by partying, shouting and fighting in the street. We accidentally left our gate open before Christmas and within an hour found ourselves in an altercation with a group sitting on our steps making a drug deal who, when asked to move on, threatened to throw boiling piss over us.

This activity can be divided into two categories:

- i) arising from the hostel accommodation in the street provided to vulnerable people; and
- ii) arising from opportunistic visitors not connected with the hostels.

We are happy to rely on the hostels themselves to manage anti-social behaviour as it arises from their residents, partly because we accept that this is essentially a pro-social activity that has to take place somewhere. However, we don't feel the same about the second group, which is in fact the source of the vast majority of problems.

This second group has substantially expanded over the last couple of years as Kings Cross has become a London destination and the apron in front of the station – including the edge that lies outside the property of the station – has become a venue for street

performers attracting crowds, sometimes of several hundred at a time, routinely until around midnight.

Removing the railings can be expected to lead to the steps and frontage of the church being used by the second group for a vast expansion of all the anti-social and criminal activity listed above. This can be expected to spill over onto the neighbouring properties, which include ours. The frontage could easily become another street encampment like the one on church property on Tottenham Court Road – but with added anti-social behaviour and criminality. These points were made at length, face-to-face, to the architect during the open day but no attempt has been made to revise the proposal in this regard. Therefore, we object to the removal of the railings.

Reinstating the railings will have the knock-on effect of making the proposed bike racks usable only by residents, which may undermine the proposal's compliance with Camden transport policy.

The general layout of the building suggests it is likely that, as now, the church doors will remain locked except on Sundays. In addition, the proposal moves the main entrance to the student accommodation from Birkenhead Street to Crestfield Street. This will reduce eyes on the street where they are most needed, especially once Belgrove House is occupied. Therefore, we object to the moving of the main entrance from Birkenhead St to Crestfield St.

More generally, it is a shame that no attempt has been made in the proposals to consider how a positive contribution might be made to the highly problematic street life on Birkenhead Street.

3. The back of The Vicarage

In rejecting the previous proposal for this site, Reason 2 was:

“The proposed development, by reason of its height, bulk and depth would result in an increased sense of enclosure at the rear of the adjoining listed buildings on Birkenhead Street and Crestfield Street and thus would harm their setting, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.”

This proposal is not so aggressive, but neither is it nothing. There are multiple encroachments that have a cumulative effect. It is quite difficult to get all of this straight from the drawings because no drawings are provided of the interior elevations to the east and west, and some of the plans are inaccurate with respect to the Vicarage (see below).

We're not experts, so are in no position to say whether the current proposal is acceptable or not and will leave the heritage aspect there. However, the proposal also comes at the expense of many of our amenities at the back of the Vicarage. Examination of the issues we raise under this heading may improve understanding of the heritage effect on the neighbouring buildings.

Our loss of amenity has three parts: a general increase in height and mass, with consequent increase in overlooking and enclosure, decrease in light and sunlight, and loss of views; the introduction of machinery on the roof, with consequent increases in noise and smell; and the introduction of outdoor spaces that impinge on our privacy.

The main increases in height and mass affecting us are:

- The higher frontages at both ends, and the new accommodation created directly behind them
- The raising of the parapet on the northern frontage
- The addition of machinery and its enclosure to the roof
- The closing of the large gap on Crestfield Street between the church and the hotel
- The extension of the Birkenhead Street building back towards our outdoor spaces
- The raising of the outdoor space on the north side of the building.

Taken together, these have a substantial effect on us, partly due to the fact they all directly impinge on our only outdoor spaces.

Overlooking and privacy of conversation

There is an increase in overlooking arising from the raising of the ground floor level. Unlike now, it will be possible – indeed inevitable – that when we are on our deck we will routinely be scanned from i) within the main church hall through the clear glass doors; and ii) the outdoor space to the north of the hall.

It is not clear to us from the plans provided whether it will be possible for residents to look out over the northern parapet at our balcony and deck. If so, that would be objectionable.

From both the roof area, including walkways, and the raised outdoor space to the north of the building, we expect to be overheard whereas at the moment this is not something we have to worry about.

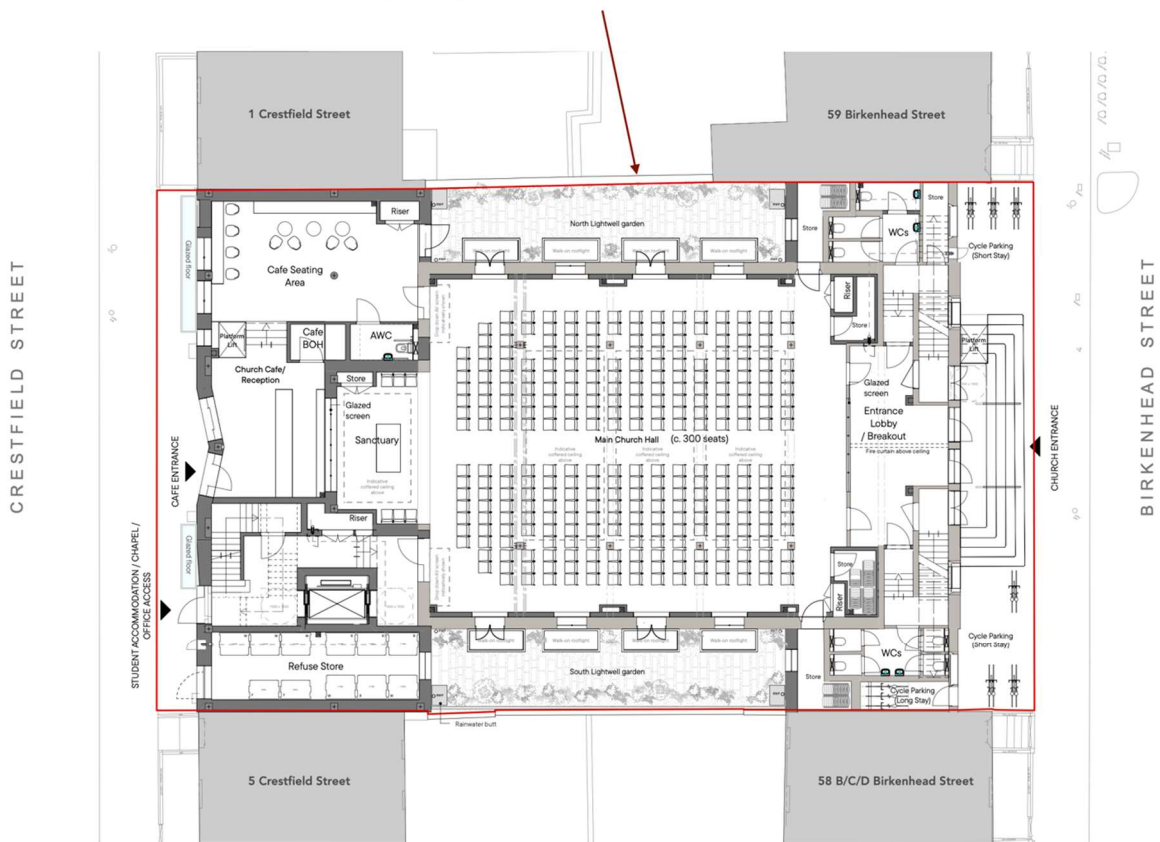
Enclosure

There are a multitude of locations both inside our house and out where the additional enclosure will be felt. At the moment, we glance up from our kitchen window and see the sky. That will go. The same goes for views from the two large windows on the staircase and from the back bedroom on the second floor.

At the top of the house (third floor) is another bedroom. From this, we will lose the very welcome sight of open sky and tree canopies. Stepping out onto the balcony, we currently have views across the rooftops in three directions. All three will be blocked up. On our deck (1st floor level) and Patio (ground floor level), the sense of enclosure will be severely increased.

As in diagram below (Proposed Ground Floor Plan), the extent of 59 Birkenhead St is not shown correctly and a window facing directly onto the proposed garden is not shown. No mention is made in the proposal or the light survey of this window, which will be almost completely covered by the raised outdoor space bordering it. Planning and amenity issues surrounding this window are not addressed.

Plan does not show existing building nor the window which faces directly onto the proposed lightwell garden. Privacy issues not addressed nor any impacts on light and sky to this window.



Light and sunlight

The light and sunlight survey of our internal rooms provided with the proposal shows the reductions to be within conventional boundaries (with one exception noted below). However, the main source of sunshine and light in the house at the moment are the generous corridors and stairs, which we use as ancillary rooms, sitting, working and living in them. No attempt has been made to assess the impact on these spaces. Since these are so much brighter to start with, it is possible that the effect on these spaces will lie outside the conventional bounds.

Equally, no attempt has been made to assess the effect or on our outdoor spaces Thanks to its closer proximity to the enclosings, we expect the loss of light and sunlight to our deck in both absolute and relative terms to be considerably greater than for the rooms surveyed.

In the patio, we are able from time to time to luxuriate in direct sunshine in the warmer months, but it seems likely that that will be taken from us almost entirely.

Noise

The proximity of the machinery to the boundary is concerning in terms of noise, and the added height that is required to screen the plant is also harmful.

The acoustic assessment has not made a proper assessment of background noise levels to the rear windows or outdoor areas to 59 Birkenhead Street. Noise levels were recorded at 'MP1' in both noise reports which faces directly onto the street and is therefore almost certainly louder than the window location used for the assessment, NSR2 (diagram below).

Thus the following statement, and possibly others, cannot be relied upon, "Table 6 shows the rating level of the proposed new equipment will be at least 10dB below the background LA90 sound level to outside the closest noise-sensitive properties."

A marked-up aerial image is included in Figure 1, identifying the location of the proposed equipment and sound level survey measurement position.

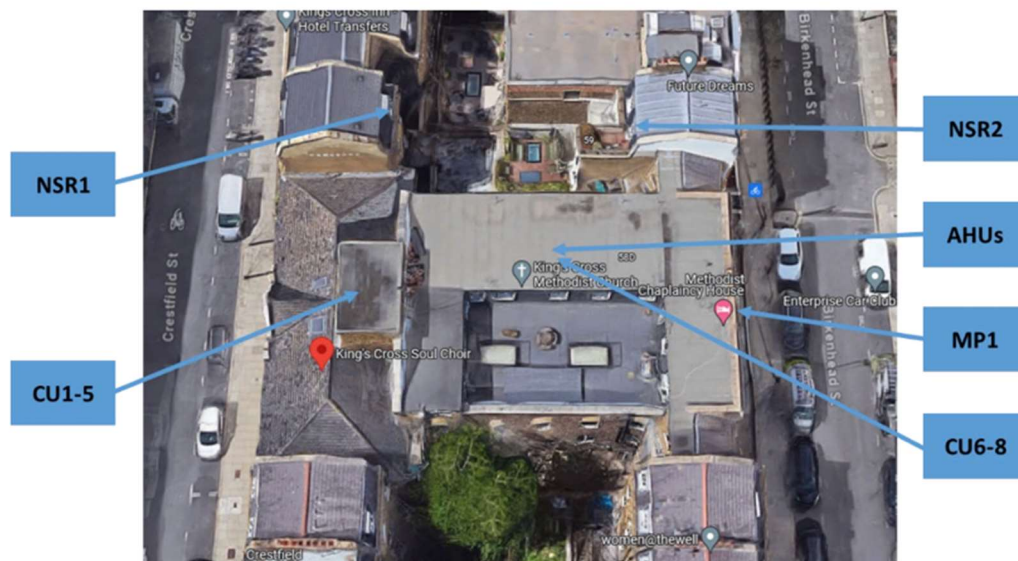


Figure 1: Equipment location, measurement position, and closest receptor (available at [google.com/maps](https://www.google.com/maps))

The model used to make the estimates has not been disclosed. However, it is clear that this model makes no attempt: to account for the reduction in background sound level to be expected from the increased enclosure of NSR2 by the larger edifice of the church; to include the stops and starts of noise, which are liable to be the aspects of any machinery that disrupts sleep the most, including failing to disclose the operating parameters in this regard provided by the manufacturers of the equipment and expected usage patterns; to account for the additive effect of the two bedroom openings that face the machinery; to allow for the reflection of sound, including reverb, from the enclosing buildings; to incorporate noise from sources not in the main machinery space (for example in the plant room and as shown on the roof plan). These deficiencies again undermine the conclusions drawn.

The machinery proposed for the roof of the development is on the same level as our main bedroom. Our bedroom is at the top of the house, built into the attic, and especially in the warmer months suffers from overheating. For this reason, we habitually have both the door and window that face the machinery open at night for three or four months of the year.

Unlike the bedrooms within the development, the windows in our bedroom are directly in the line of sight (and sound) of the machinery. In addition, they are in fact closer to the machinery than many of the student bedroom windows. Yet the proposal systematically

treats our sleep with less care than it treats that of the future occupants of the development's bedrooms [students].

Section 6.2 Ventilation Strategy of the Noise Impact Assessment for Proposed Student Accommodation states that in order to avoid noise from the machinery disturbing the sleep of occupants at night, "...it may not be appropriate to rely on open windows to mitigate overheating...". It goes on to rely on the following guideline: "The Association of Noise Consultants Acoustics Ventilation and Overheating: Residential Design Guide, notes that 'a more prudent limit for mechanical services noise around 24-26dBA is likely to be required to prevent an adverse reaction from most occupants while falling asleep'.

By contrast, the computer model used to forecast noise inflicted on our property forecasts 34dBA for our bedroom at night. Thus, we are expected to endure a level of noise that is considered unacceptable for the occupants – even with more poorly insulating single-glazed windows and no reliance on active ventilation and cooling.

As well as being unacceptable in principle, this alteration will oblige us to turn to air conditioning to cool our room, which is something we seek to avoid.

Furthermore, no consideration is paid to the effect of the noise on our enjoyment of the balcony itself. No attempt has been made to model the amount of noise to be expected there or to argue that it is acceptable. For much of the year, this is the only outdoor space we have that gets direct sunlight.

Smells

As we understand the proposal, the kitchens are to vent via the machinery by our balcony. No assessment has been made of the nuisance from smell to be expected and hence no reassurance has been provided on this point. At the moment, our house and outdoor spaces are wonderfully free of commercial cooking smells.

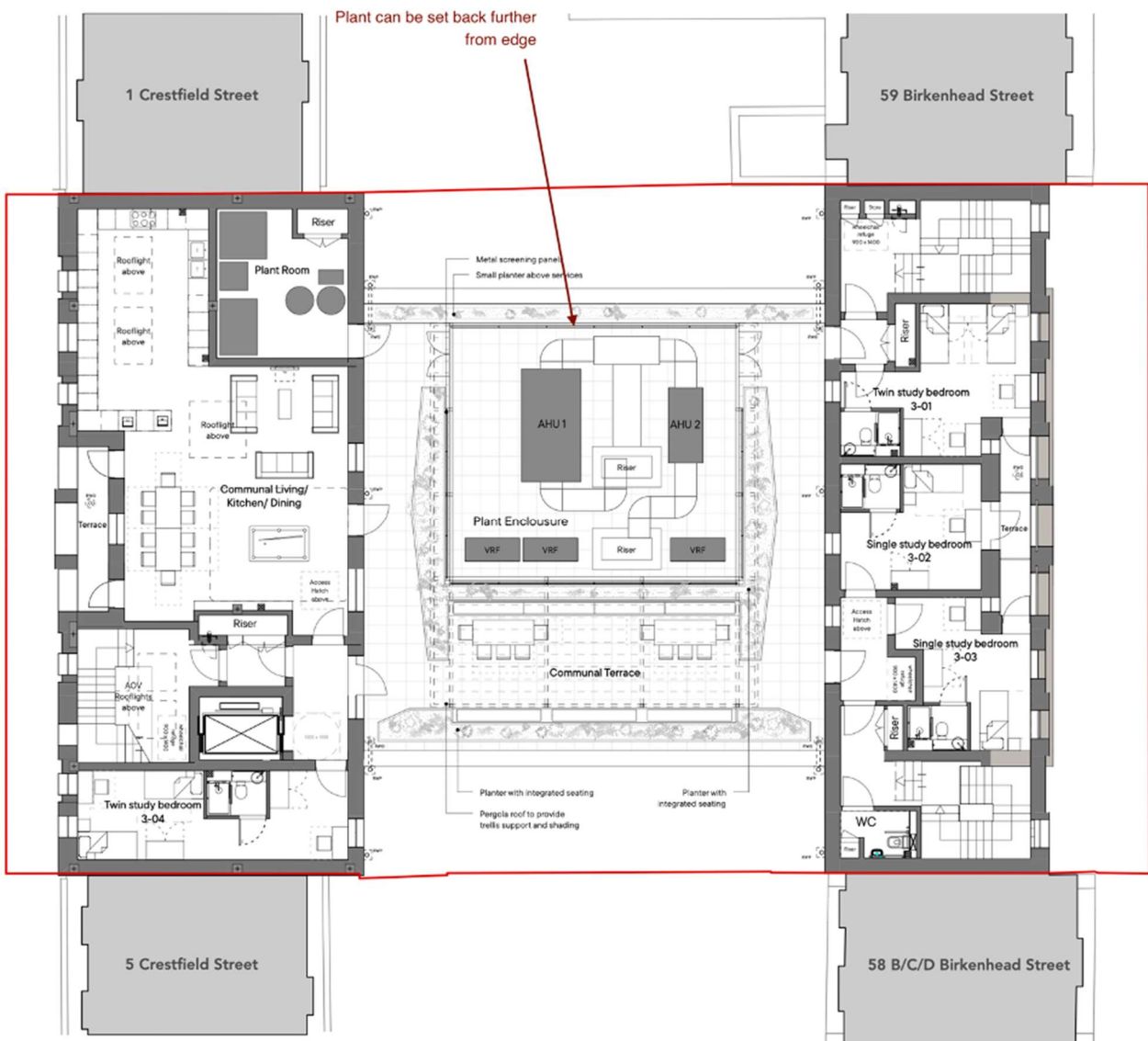
Remedies

We ask that the planning and amenity issues, including light and sunlight, revolving around the ignored window on the south side of our property be addressed in the light of an accurate plan.

To reduce but not eliminate the loss of amenity described above, we request the following alterations:

- Instead of raising the parapet on the north side, put in railings; use alternative methods to avoid any consequent overlooking or increase in experienced noise that is introduced.
- Reduce the loss of amenity caused by the machinery. In this:
 - Treat disturbance to our sleep with no less care than is afforded to disturbance to the sleep of the students
 - Improve the realism of the model by re-measuring the background noise levels and taking account of the several complicating factors mentioned above
 - Model the noise to be expected on our balcony and ensure it is acceptable
 - Remove the need for mechanical ventilation by working harder at making passive cooling in the summer effective
 - Whatever machinery is ultimately required, move it away from our bedroom and improve insulation (diagram below)

- To reduce noise and odours, re-route the ventilation from the kitchens so that it exhausts on to Crestfield St; provide an enforceable limit for odours.
- Our existing views can only be maintained by completely redesigning the proposed edifice. In the absence of that, we would welcome a proposal to somehow restore to us in an outside space some views and sky.



4. Within the Birkenhead St tower

On the ground floor plan, a hot-air hand dryer is shown in a toilet in the north-east corner. This will introduce noise that we expect to be able to hear through the old, thin walls. We ask that this be replaced by a noiseless hand drying mechanism.

5. Basement excavation

We are frankly unable to comprehend the Basement Impact Assessment and associated documentation. The BIA document contains no clear statement or map of the area to be excavated. Nonetheless, it appears to us from the plans also submitted that it is intended to excavate right up to the wall of our home. We find this alarming and request that a clear statement of the planned excavations, understandable by the lay person, be provided. We recall that when the Vicarage was restored, in the 2010s, permission was refused for excavation down to this level at the rear of the property.

Yours sincerely,

William Cullerne Bown

on behalf also of Nancy Leeming, Maya Leeming, Connie Cullerne Bown and Seth Cullerne Bown