

**From:** Sandy Lien  
**Sent:** 16 April 2025 00:41  
**To:** Planning  
**Cc:**  
**Subject:** Subject: Objection to Planning Application Reference 2025/1084/P

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*Dear Planning Officer,*

I am writing to formally object to the proposed planning application reference *the Froggnal Garages site (Land West of Ashley Court).***2025/1084/P.**

*Palace Court directly sits next to the site, and we are seriously concerned about the adverse effects this proposal would have on our building, its residents, and the wider neighbourhood. Many of these concerns were clearly acknowledged in Camden's own pre-application advice dated February 2025( related to Planning Application **2024/1122/P**) — advice that appears to have been largely disregarded in this revised submission.*

My objections are based on the following key points:

### **1. Basement Excavation & Structural Risk**

*The proposed basement exceeds Camden's Policy A5 constraints, notably excavation beyond 50% of the front garden. In the Council's own words, "the basement Impact Assessment lacks clarity" and "no structural information or input from a structural engineer" has been provided. Given that Palace Court has experienced historical subsidence, we are alarmed that such a structurally significant intervention is being proposed without proper technical assurances. The basement works will increase the building's insurance premium for neighbouring properties making them less affordable.*

- **Slope Stability and Groundwater Flow Risks:** The extensive basement excavation poses risks to neighbouring properties due to potential ground movement, slope instability, and possible building subsidence. There is no report providing a risk and impact analysis so far.

### **2. Significant Daylight & Sunlight Impact**

*Camden's February 2025 advice explicitly states:*

*"The development significantly impacts multiple windows on the ground and first floor in two different areas of Palace Court for both VSC and No Sky Line."*

*In fact, the updated scheme worsens this impact. The new daylight report shows more windows failing the BRE Vertical Sky Component (VSC) test than in the previously refused application. At least **four ground-floor windows** are now shown to experience light losses well above the 20% BRE threshold, with some exceeding **60%**. My flat is on the first floor and the rooms facing Frogna Lane already have limited sunlight. With the building plan to be built next door, there will further reduction of the sunlight. This can cause me loss of Vitame D and impact on hair loss for example. My GP had advise me to ensure proper sunlight exposure to keep my bedroom with lighting coming through is essential for my age and health condition.*

*This is not marginal. It constitutes serious harm to residents' living conditions — particularly those working from home or occupying basement and lower-ground units. This is a clear conflict with **Policy A1** of the Camden Local Plan and **Policy D6** of the London Plan.*

### **3. Privacy & Overlooking**

According to 'Camden Planning Guidance Amenity January 2021' Section 2.4, "Overlooking, privacy and outlook," it is recommended to provide a minimum distance of 18m between the windows of habitable rooms in existing properties and the proposed development. The proposed development has the following issues:

- **Overlooking Issues:**

*The revised design provides **unobstructed views from new windows and terraces into private rear gardens, patios and even bedroom windows at Palace Court**. The Council noted that “the relationship between the rear of the site and Palace Court” raises serious privacy concerns and that current distancing “further compounds the issue.” It also breaches **London Plan Policy D3**, which requires private outdoor spaces to be protected from direct overlooking within 10m of a rear elevation.*

- Balconies and terraces are too close to neighbouring properties, particularly Ashley Court and Palace Court, leading to increased overlooking and significant privacy loss for residents.

#### **Direct View, Noise, Air Quality Concerns which Impact Quality of Life with Mental and Physical Health:**

The current positioning of balconies allows direct views into adjacent properties, severely impacting residents' privacy, especially into bedrooms. I am very sensitive to movement, noise and air quality any unbearable dusk can cause my health issue to derailed my allergic reaction. I am happy to invite you to my flat for inspection for your understanding.

Reduced natural light will adversely affect living conditions. The plan exceeds BRE guidelines for properties at 11-17 Palace Court and 250 Finchley Road. The reduction of privacy will impact the mental and physical health of Palace Court residents. For instance, I use the private garden at Palace Court for outdoor activities such as fresh air and exercise, which are crucial for my well-being. If the planning approval goes through, I will feel overlooked when using this private garden area, negatively impacting my health. Other resident also use the area for BBQ, meditation and family/ friends gathering.

### **4. Amenity, Design & Street Environment**

*Camden's advice raised significant issues around the design and streetscape impact:*

*“There is significant concern that the front landscaping and spaces will appear packed together and of poor quality. This creates a very cluttered entrance point which is highly visible and will therefore have the maximum impact.”*

*This issue remains unresolved in the updated proposal. The excessive bin and cycle storage remains poorly integrated, compromising both appearance and functionality. The design does not reflect the quality or coherence expected in the Redington Frogna Neighbourhood Plan (Policy SD4).*

## **5. Garage Use & Misleading Claims**

*The applicant claims the garages are underutilised. This is incorrect. Several Palace Court residents actively use the garages, and their removal will increase pressure on local on-street parking. The suggestion that this is a “car-free” development is misleading, especially given the oversized replacement garage being proposed. The proposed numbers of garages is less than current available garage spaces. Currently, off street parking is already very limited in CA-H parking zone, this will increase further pressure on existing residence for finding parking spaces.*

## **6. Unmet Policy Objectives & No Public Benefit**

*The development provides no affordable housing, despite exceeding the density threshold that should trigger either provision or financial contribution (Local Plan H4). It delivers no public amenity space, no commercial or community use, and only worsens existing infrastructure stress. It cannot credibly be called a sustainable or balanced development under the NPPF’s definition in paragraph 8.*

## **7. Restrictive Covenants**

There are restrictive covenants registered at Land Registry which affect the land of the development site. The restrictive covenants would limit the height of the proposed development to the height of the existing garages. The height of the proposed development will significantly reduce daylight and sunlight for properties at 11-17 Palace Court and 250 Finchley Road, exceeding the BRE guidelines and is in breach of the restrictive covenants

*In summary, the application fails to meet key requirements of the **Camden Local Plan (Policies A1, A5, H4, D1)**, the **London Plan (Policies D3, D6)**, and the **Redington Frognal Neighbourhood Plan (Policies SD4, UD1, UD2)**. This is the second proposal for this site — and it is notably more intrusive than the one Camden rightly refused in 2024.*

*We strongly urge the Council to reject this revised application (2025/1084/P) and uphold its responsibility to protect the character, safety, and amenity of this residential area.*

*Yours faithfully,*

*Sandy Lien*