

Thursday 5<sup>th</sup> June 2014

**To the relevant planning officer**

**Re Application No. 2014/3330/P  
for 13-15 John's Mews**

We write to object to the application for planning permission for 13-15 John's Mews under Application No. 2014/3330/P ("the Application").

Although expanded upon below, in outline we object to the application on grounds of the possible groundwater impact of the proposed development on the conservation area and adjacent listed buildings.

The objection is made by reference to principles identified in Camden's Planning Guidance on Basements and Lightwells and information contained in The Camden Geological, Hydrogeological and Hydrological Study, along with Camden's wider policies identified in its planning and conservation policy documents.

The application seeks permission for demolition of the existing structural slab of the properties and excavation of new sub-surface areas to a depth of 4 metres below ground level.

**13-15 John's Mews**

13-15 John's Mews are identified in the Bloomsbury Conservation Area Appraisal as making a positive contribution to the conservation area. They comprise the only 2 mews houses on the Northern section of John's Mews that still exhibit the original proportions. The properties back onto 2 Grade II listed Georgian houses to the East, at least one of which (24 John Street) has a subterranean vault extending Westward from its rear towards the property line with 15 John's Mews ("the Vault").

**The Application**

The Application seeks permission substantially to demolish the floor of the existing properties and excavate to a depth of at least 4 metres, and potentially more if soil conditions demand it. We have 3 principle objections.

First, from the plans it appears to be proposed by the applicant that footings for their new basement walls will project beyond the boundary onto land that falls within the Grade II listing of 24 John Street. Aside from the fact that there has been no discussion of this proposal with the current owners, we note that there is no application for listed building consent for this construction, when it necessarily will involve works of construction on premises that are listed on walls that form part of the curtilage, and hence part of the setting, of 24 John Street's listing.

Secondly, and more importantly, the basement impact assessment makes sweeping assumptions about the absence of subterranean watercourses and the effect of the proposed development on the water table and adjacent properties, whilst glibly making assertions on

the basis of an unidentified allegedly adjacent property without any data for the actual site. There are three aspects to this point:

1. Figure 11 of The Camden Geological, Hydrogeological and Hydrological Study identifies overground and underground watercourses within Camden. Figure 11 clearly identifies subterranean watercourses running under John's Mews/John Street, with an apparent confluence approximately beneath 13-15 John's Mews. We were told by the then owners (around 2004) that these watercourses were substantially responsible for washing out the foundations beneath 18 John Street, necessitating significant underpinning and remedial work around 1999/2000. No account seems to have been taken of the possible location of the channels for these rivers, no investigation has been undertaken, and no allowance is made for their presence.
2. According to the Basement Impact Assessment for Planning Application 2013/5685/P for 27 John Street, The British Geological Survey borehole found ground water at between 3.60m and 5.10m depth in the vicinity of the property. The Basement Impact Assessment for this Application asserts that ground water level on an unidentified "adjacent" property (which cannot have been adjacent, as there have been no works of excavation on those properties that are truly adjacent) was "at approximately 7 metres bgl" which is "anticipated" (in paragraph 5.2 of the statement) to be the equilibrium water level. Given that the Application seeks permission to excavate to at least 4 metres below ground level, The British Geological Survey suggests the applicant's assumptions are wrong and the proposed works will directly impinge upon the ground water level. There is no evidence of actual investigations produced by the applicant to suggest that The British Geological Survey is wrong.
3. 24 John Street has a subterranean vault running towards the rear property line which forms part of the original substantial Georgian basement and comprises an integral part of the basement accommodation. As a Georgian house, it is built using traditional methods that will make it susceptible to damp if there is any significant permanent change in the local water table. No allowance seems to be made by the applicant of any impact of excavations near the rear vault or the comparative depth of the new construction. Indeed, the basement assessment report seems to have been written without any knowledge or consideration of the original basements to the listed Georgian properties on John Street.

Thirdly, the Application is made at the same time as another application for a basement development is pending in relation to 27 John Street and its associated Mews House. Neither application can be seen in isolation, as each may have a cumulative impact on groundwater and subterranean watercourses. We are concerned that each may be considered independently of the other on the basis that the report for each takes no account of the effect of the other, resulting in a sudden, significant impact on the hydrology of the area.

#### Comment – accuracy of supporting documents

The drawing of the proposed rear elevation fails correctly to incorporate the changes made to the roof lights to the ground floor rear and the proposed new lightwell. If permission is to be considered, it should only be on the basis of drawings which are internally consistent.

**Conclusion**

In the circumstances set out above, we object to the planning permission sought. Further, given the linked nature of the issues raised by this application and Planning Application 2013/5685/P we would invite you to cause both applications to be referred to the full Planning Committee.

Yours faithfully,

Richard Morgan & Monica Coombs

24 John Street,  
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cc: Gideon Whittingham, Alan Wito, Hugh Cullum, Awale Olad