

Flat 1
23 John Street
London
WC1N 2BG

Principal Planning Officer
London Borough of Camden
Town Hall
Judd Street
London
WC1H 8ND



12 June 2014

For the attention of Mr G Whittingham

Dear Sir

Planning Application at 13-15 John's Mews, London WC1N 2PA (ref. 2014/3330/P)

The purpose of this letter is to convey my concerns and formally lodge an objection against the above mentioned Planning Application. I have studied the various documents submitted with the application and have a number of points which I firmly believe warrant more detailed consideration by the Planning Authority before making a final determination.

Loss of employment use

As part of Planning Application 2013/4967/P, the planning authority determined that the applicant had provided sufficient information to satisfy the criteria of DP13 and CPG5 in demonstrating that the change of use from B1 to C3 is justified. This appears to fundamentally ignore the ethos of policy CS8, clause 8.10 which states that '*.....there has been pressure to redevelop the council's stock of land for employment purposes, particularly manufacturing and industry, for higher value uses, principally housing. Once employment land in the borough has been developed for an alternative use it is very unlikely that it will even be returned to industrial use.*' Clause 8.13 states that '*the council will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use.*' Evidently, a viability assessment was submitted with the application and where the applicant's objective is to achieve a consent for a residential conversion, there is a real need for the planning authority to rigorously test and investigate the claims and statements made by consultants employed and invited to make statements on behalf of the applicant. Can you please confirm how these statements were effectively interrogated by the council? My reading of the statement is that 13-15 John's Mews are considered to be old buildings that have no potential commercial interest. Do you really agree that it will cost circa £444k to refurbish those buildings to a level suitable for a B1 tenant? Are there really no tenants who might not be seeking a lift, air conditioning or dedicated meeting rooms?

The previous application included a schedule of available commercial premises within the WC1 area. No such information has been provided with this application, which I expected to be a prerequisite for registration of the application and as such, the reference data is more than 6 months old. This application is still for a change of use and not just a non-material amendment to the earlier consent, so I believe that the council should be analysing the viability with a much

Planning Application at 13-15 John's Mews, London WC1N 2PA (ref. 2014/3330/P)

greater focus on complying with the spirit of Core Strategy policy CS8 rather than a simple acceptance that the submitted data is accurate.

Overlooking

Evidently, the council have previously determined that the proposed first floor French casement doors / Juliette balconies and the proposed second floor level dormers are acceptable. However, there is clearly a change in the dynamic of occupation periods between a residential to commercial user compared with a residential to residential user. It is simply not accurate to state that *'it is considered the change of use from commercial to residential would not introduce a greater potential for mutual overlooking'* as referred to in the member's briefing report from the previous application. Where both buildings are occupied during similar hours of day / night, of course there is greater potential for mutual overlooking! Similarly, where additional windows are introduced at second floor level, the potential increases further.

I am aware that the second floor dormer windows are noted as being obscure glazed, but if the planning authority is minded to approve this application, I would ask that a condition is placed to ensure that those windows are to remain permanently closed or restricted to an opening of no greater than 100mm so that overlooking is restricted.

The first floor French casement doors are formed within existing window openings of the same equivalent width. This means that I will now have to look at a full door height glazed opening rather than a window. The result, again, is an increase in perceived overlooking which I consider to be harmful.

Quality of Design

Clearly a subjective issue, but the proportion of the first floor French casement doors as shown are crude, ill-considered and not appropriate in the context of the Listed Buildings. I would encourage the planning authority to insist that the door opening width is reduced, so as to provide no more glass area than the current windows, thereby improving the proportion as a result.

Drawing Inaccuracies and a lack of information

The section through the existing building shows my garden ground level somewhat higher than the ground floor level of 13-15 John's Mews and yet the section through the proposed building shows my garden level having been reduced down in height. Is the applicant intending to modify my ground level? If so, I haven't granted my consent. Furthermore, there appears to be no information submitted to demonstrate how my garden will be physically retained to enable excavations to be carried out for the proposed basement. These are very important aspects which I would expect the planning authority to consider before determining an application.

The rear elevation of the proposed building is inconsistent with the floor plan in that the rooflights and the roofline beyond the lightwell are not accurately shown.

Listed Building Value and the impact of roofscape changes

An extract taken from your member's briefing report from the last application reads *'Generally the rear of Georgian terraced houses were never designed to the same quality as the front which reflected the status of the façade which faced onto rear yards.....Whilst the views of the rear of*

Planning Application at 13-15 John's Mews, London WC1N 2PA (ref. 2014/3330/P)

the townhouses are of some interest, the limited amount of the façade obscured by the proposed mansard roofs would not be considered harmful. This statement implies that the primary façade of Listed Buildings should be given more respect and the opportunity for preserving visual access from the public realm is less critical for a secondary façade. I would argue that this is a common misunderstanding and one where English Heritage would hold a quite different view. The case officer fails to identify that the cumulative effect of adjoining roof mansard extensions in John's Mews have almost entirely removed the potential for long distance views of the rear of the Listed Buildings. Indeed, nos. 13-15 are the only remaining two storey example of the original mews profile and to lose that historical reference would be detrimental to the setting of the Listed Buildings and to the character of the surrounding conservation area.

Basement Groundwater & Subterranean Watercourses

The basement Impact Statement submitted with the current application is vague, inconclusive and lacks proper detailed information derived from on-site testing and analysis. You will be aware of the application at 27 John Street / 21 John's Mews where the Basement Impact Statement includes BGS borehole records of groundwater at 3.60m – 5.10m depth in the vicinity. There also appears to be a confluence of subterranean watercourses under / near to 13-15 John's Mews. Both of these issues are fundamental in determining the appropriateness of this application.

I consider that the two separate planning applications need to be analysed jointly given that one is likely to have an impact upon the other. I don't believe that your authority should be determining an application which is based on such limited investigatory work and as such, I request that a decision is deferred until the applicants have jointly commissioned an independent report which properly assesses the impact of one or both of the proposed basements.

In summary, I hope that these points and observations will receive appropriate scrutiny and consideration by your authority and await your response in due course. If the authority is minded to recommend approval for this application, I would ask that it be considered before your committee rather than it be determined under delegated powers please.

