

Dike, Darlene

From: Whittingham, Gideon
Sent: 20 February 2015 18:17
To: Planning
Subject: FW: Objecting To Planning Application 2014/7710/P St Pauls Mews
Attachments: Objection To Planning App St pauls Mews.docx; ATT00001.htm

From: Steve Brown [REDACTED]
Date: 10 February 2015 10:26:50 GMT
To: [REDACTED]
Subject: Objecting To Planning Application 2014/7710/P St Pauls Mews

Dear Councillors,

I am writing because I have some serious concerns about a planning application that has been put in to build a house with a basement in the land behind my home in on Agar Grove. The plot in question is St Pauls Mews- Land behind 128/130 Agar Grove Application ref 2014/7710P

My back garden borders the west side of the plot and I am very concerned. The plan is to build a single storey house and excavate a substantial basement. The plans show the proposal being directly against our garden wall and barely ten meters from my house. It is less than ten meters from the house next door, 128/130. I am worried that digging a basement this size, so close to our house will cause structural problems. The houses are all over 100 years old and have recently had structural works carried out by Camden Council. The plans are not very detailed but they do show a roof terrace which will overlook mine and others gardens.

I am also very concerned about the trees and ivy that is growing in the vicinity. The arborologists report claims the trees will be safe but judging by the plans the sycamore tree in our garden will loose around 30% of its roots. I believe the intention will also be to prune all overhanging branches which will no doubt kill this tree. The ivy that grows around the border of the site is home to several species of wild bird, including a flock of delightful House sparrows which have been on the decline in London and are listed as a priority species. I have no doubt that this habitat and the trees will be lost should this proposal go through.

Best regards

Stephen Brown
126B Agar Grove
NW1NTY

Gideon Whittingham
Planning Officer
East Area Team
London Borough of Camden
6th Floor, Town Hall Extension (Development
Management)
Argyle Street
London WC1H 8EQ

Stephen Brown
126B Agar Grove
London NW1 9TY

5th February 2015

BY EMAIL AND BY POST



Dear Mr Whittingham

**Re: Planning Application 2014/7710/P
St Paul's Mews NW1 9TZ**

1. I wish to make you aware of a number of strong objections that I have with regard to the proposed development of the erection of a new house at St Paul's Mews (land to the rear of 128 Agar Grove London NW1 9TY) application number referenced above. I have reviewed the plans and know the site well as I have lived on Agar Grove for a number of years.

Clarification of certain statements in the planning application

2. Before I set out my objections I note what I believe to be a number of factual inaccuracies in the planning application document prepared by S Chapman acting as Agent dated 9 December 2014. These are set out in paragraphs 3 and 4 below.
3. **Use of the land.** Document Ref 04: 6060 dated 9 December 2014 further indicates the land as having "Nil use". As far as I am aware the land is used for parking and community events by residents of St Pauls Mews. I further note that the Basement Assessment Report on page 4 states "the site is currently being used as a carpark" as indeed does the Arboricultural Assessment on page 2. These reports therefore contradict Document Ref 04 as having "Nil use". For all the time I have lived at Agar Grove the land has been used for parking and community events until it was apparently dug up in the last 12 months.
4. **Bomb Damage.** Paragraph 2.6 in CGLS Basement Impact Report states that *'The London County Council Bomb Damage Maps indicate that neither the site, nor the buildings in the immediate vicinity suffered bomb damage.'* However the Bomb Damage maps clearly indicate that 128,130 and other houses on Agar Grove near the site did suffer bomb damage.

Agar Grove Background

5. Agar Grove is a residential street situated in the east of Camden Town. The houses are over 100 years old. The freeholds of the four properties closest to the development, 124/126/128 & 130 are in the hands of Camden Council. All of these properties have recently had or are due to have remedial structural works carried out to the rear of the properties closest to the proposed basement.
6. Agar Grove falls within the **Camden Square Conservation Area** where the road and the adjoining properties hosts numerous types of trees, shrubbery and various types of urban wildlife which will be lost as part of this development.

Specific objections

Objection 1 – The development is too close to existing properties

7. CGL's report dated November 2014 claim that the nearest building is approximately 10 meters from the basement. However numbers 128 & 130 Agar Grove are clearly much nearer. The brick wall which forms the boundaries of gardens at 126/128/130/132 is directly adjacent to the proposed layout. Excavating a basement of this size must cause issues with the foundations and structural integrity of buildings and walls of this age.
8. The proposal to build directly against the boundary walls and fences will preclude proper maintenance.
9. The proposed designs clearly show that the roof will be accessible as a terrace. This means that properties and gardens in the vicinity of Agar Grove and St Pauls Mews will be overlooked. The gardens and ground floors of 124, 126, 128, 130 and 132 Agar Grove will be directly overlooked from the roof terrace.

Objection 2 – The development has an adverse environmental impact

10. **Core Strategy CS15: Protecting and improving our parks and open spaces and encouraging biodiversity.** In this strategy the Council states that it "will protect and improve Camden's parks and open spaces including private gardens" and will engage in "protecting trees".
11. The proposal is not in line with the **Camden Biodiversity Action Plan**. The dense Ivy that borders the site on all three sides is habitat for a number of wild birds including a flock of between twenty and thirty **House Sparrows** which are listed as a priority species and covered under **section 41 of the Natural Environment and Rural Communities Act 2006 supported by the NPPF**. The proposed development will destroy crucial habitat in which these declining wild birds have thrived.

12. Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton versus SOS it was concluded the private and family life encompasses not only the home but also the surroundings. The area where the proposed development is situated and the biodiversity it will affect forms part of the surrounding for the residents of the Agar Grove.
13. I note that the Arboricultural Assessment conducted by ACS Consulting states in section 1.3 "*I have been appointed by the site owners as a competent and qualified arboricultural consultant to provide this report and supervise any works that may have the potential to affect the trees*". This statement shows a serious conflict of interest by ACS who now has a very clear and obvious interest in ensuring this application is approved as they have been committed to receiving further work in relation to this project. The existing site plan does not show the sycamore tree in the garden at 126 Agar Grove or other trees which will be affected. Nor does it show the ivy as mentioned above. The trees on the drawing are not representative of their actual size. I feel this report cannot be relied upon which is disappointing given the number of issues there are with trees in this proposal.
14. Over a number of years, the number of trees in Agar Grove has diminished. Firstly, this proposal will lead to the loss of one tree and will seriously risk three others. Many of the trees are right next to the walls where the proposed development is situated. The Arboricultural Assessment identifies that St Pauls Mews (Islington) Limited can legally remove parts of the trees which over hang the land at the rear of Agar Grove can. If these trees are chopped down to the extent described and their roots damaged by the excavation then they will die. If the trees hang to this extent then this means that the roots also reach into the ground in the proposed development. If a key root is cut then a tree will die. I also assume this will apply to the ivy which as mentioned above is habitat for a priority species.

Other minor objections

15. I am deeply concerned that the application does not contain a simple and normally understood visualisation of how the new property would look. The proposal states the property will not be constructed higher than the fence on top of the boundary wall but the plans clearly show that it is. The proposal contains architects drawings which are not readily understood by the average person. There seem to be numerous inconsistencies between the drawings and I fail to see how they can be accepted as being credible.
16. **CPG7: Creation of unacceptable parking pressure or add to exiting parking problems.** The Mews, Agar Grove and St Pauls Crescent are already crowded with vehicles and the number of vans, deliveries and parking for construction staff will create unacceptable parking pressure.
17. **CPG6: Amenity. Camden expects all buildings to receive adequate daylight and sunlight.** As this development is only one storey at ground level with walls and a gate surrounding it and is opposite a three story building I fail to see how this design allows its occupants adequate sunlight. Furthermore, it is surrounded by trees that are significantly bigger than those set out in the drawings in the application. These will further result in the loss of sunlight to

the property. I don't believe that a 25 degree line from the lowest window will meet the requirements of section 6.7 of CPG6.

18. **Means of Escape.** There is no provision on the plan for means of escape from the basement as laid down in Camden's basement guidelines.

Conclusions

19. In conclusion I believe that this development should be rejected on two grounds:
20. Firstly the development and proposed basement excavation is too close to adjacent properties. Many of these properties are over 100 years old. Excavation of the basement will create unacceptable structural risks to properties that have or are going to be having remedial structural repairs carried out. The plans submitted do not seem to meet many of Camden Councils own planning guidelines.
21. Secondly, there will be an extremely negative impact on the bio diversity of the Mews and other environmental risks. This development will give rise to an uncomfortable relationship between protected trees and the proposed development in which there will be loss of trees either directly or through excessive of pruning. This is in direct conflict with Core Strategy CS15 and the Camden BAP. Special consideration should be given to habitat for the flock of House Sparrows which are priority status wild birds. Should this proposed development go ahead there should be a clear expectation that trees and other biodiversity will be at extreme risk.

Next Steps

22. I formally request to speak at the local planning authority committee meeting at which the application may be decided and if notice is required please consider this letter to be notice.
23. If this application is to be decided by councillors, please take this as notice that I would like to speak at the meeting of the committee at which this application is expected to be decided. Please let me know as soon as possible the date of the meeting.
24. Should the application be approved I request that the London Borough of Camden uses its powers to enforce controlled hours of operation and other restrictions to make the duration of works more bearable and that Camden Councils own arborologist oversee and approve work to any trees and shrubbery before it is carried out. Also that Camden Council closely monitors plans and actions that will affect biodiversity.

Yours sincerely

Stephen Brown
126B Agar Grove

Mrs Jackie Hodgetts 27 St Paul's Mews London NW1 9TZ [REDACTED]

11 February 2015

Gideon Whittingham
Planning Officer – East Area Team, London Borough of Camden
6th Floor, Town Hall Extension
Argyle Street
London
WC1H 8EQ

[REDACTED]

Dear Mr Whittingham

OBJECTION TO PLANNING APPLICATION 2014/7710/P – ST PAUL'S MEWS

I have lived on the Mews for the last three years, since my retirement 5 years ago and have watched the community on our street, and beyond, enjoy the use of the space that the above application proposes to build on.

My grandchildren, and the other resident children in the Mews, play on the land – in a safe environment away from any through traffic EVERY DAY.

The residents have registered this land as an asset of community value and regularly hold parties, events and meetings there – and often run events to raise money for the local community centre on it.

- The Kings Cross area is one of the most concrete urban areas of the Borough – and you will well know that we are completely surrounded by new building and housing – most of which is thankfully mixed council and private occupancy. It seems both unnecessary and in direct contradiction of Camden's building policy to build a single 'gated' private residence on a piece of land that has incredible community value.

There are many other objections I could make on legal grounds and I'm sure you will have been informed of the errors in the application and the legal dispute over the land's ownership.

But I am compelled to major on the fact that this is in a conservation area with very little open land for community use. It would be incredibly sad for it to be built on.

Yours sincerely,

Jackie Hodgetts