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23 John Street
London
WC1N 2BG

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

3 December 2015

For the attention of Mr G Whittingham

Dear Sir

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

You may recall that I wrote to you on 12 June 2014 in respect of the above application at which time I cited a number of concerns which warranted a formal objection. Not having received a response from you, a good number of those issues remain relevant and require consideration please. Evidently, a significant amount of work has been undertaken since my last correspondence, particularly in respect of the methodology surrounding the basement construction and the presence of ground water. However, there are fundamental issues which remain unresolved and to my mind, they justify further detailed consideration by the Planning Authority.

Groundwater Monitoring

I refer to the most recent letter by Geotechnical & Environmental Associates (GEA) dated 30 November 2015 which summarises their position and addresses some concerns raised. Section 2.3.1 of the letter refers to the fact that groundwater measuring has only been undertaken in the drier seasons and states that *'it is therefore considered that the groundwater monitoring should be continued during the wetter months to either confirm that the proposals remain relevant in the wetter periods or obtain information for those periods'*. In the absence of full and conclusive measuring, the proposed construction techniques cannot be considered as resolved and as such, the impact of the basement on the host building and adjoining listed buildings cannot be accurately assessed. In light of this, I don't believe that your authority should be determining the application until such time as adequate measurements are provided to substantiate the design. It would be irresponsible to resolve this issue by planning condition as it is a material issue requiring consideration prior to formal determination.

Ground Stability

Also referring to the above letter by GEA, section 2.3.2 relates to ground stability issues. GEA state that *'The Basement Impact Assessment makes it plain that the construction is not straightforward but the recommended sequence, strict regime of monitoring and mitigation measures demonstrate that the potential impacts of the basement have received due consideration'*. In response to this, I would express concern that any amount of detailed planning and justification at this stage become wholly irrelevant at the construction phase unless

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there is a procedure in place for ensuring that works are carried out in accordance with a fully detailed method statement. As such, in the context of listed buildings, I believe that the local authority should be insisting on the production of a detailed statement to set out the regime for monitoring and the requirement to submit site monitoring results to the LPA as one expects where works are undertaken in close proximity to protected trees. Without a mechanism to ensure close control / monitoring during the construction phase, I fear that this 'on paper' exercise could prove pointless and result in unnecessary risks.

Extent of demolition and loss of historic fabric

As part of the further submission of detailed documentation and consideration of the construction methodology, it has become clear that there is substantial demolition of the existing building fabric. The building is sited in a Conservation Area and is specifically identified as a building which makes a positive contribution to the Conservation Area. As such, I question whether your Conservation Officer has been fully appraised of all of these changes which have a cumulative impact on the building and the wider context. Please confirm whether you have re-consulted him during the application process because the proposals appear to wholly contradict your policies CS14 and DP25.

In summary, I hope that these points and observations will receive appropriate scrutiny and consideration by your authority and I await your response in due course.

Yours faithfully

Mr R Crowley

cc Cllr Awale Olad