Re Planning Application 2016/7088/P

We have received a letter from the developers saying that they have requested Camden to extend the time for the application in order to revise their plans and further consult with local residents. The extent of these revisions is unknown but the developers say they will take into account the objections to the plan that were raised at the meeting to which residents were invited on August 1st.

For the record therefore we wish to state our objections to the existing scheme in order that, should these not be addressed in the revision, the objections will still stand.

Comments on the proposed development of the Rochester Square Spiritualist Temple.

We formally object to this proposal on the following grounds:

a) There will be an adverse effect on the residential amenities of the houses 29 - 36 Rochester Square and many of the flats in Julian Court by reason of overlooking, loss of privacy, noise and disturbance due to the proximity of the dwelling units and community spaces. The entire proposal shows an egregious disregard of CPG6 regarding proximity to other dwelling units

b) The proposal sets out an unacceptably high density and over-development of the site in this Conservation Area. It involves loss of the open aspect of most of the houses overlooking the east façade of the site.

c) The visual impact of the development is detrimental to the houses on the eastern side and to the flats on the western side. It is over-bearing and out-of-scale in terms of its appearance compared with existing development in the Camden Square Conservation Area. The Google Earth map of the Area shows that the proposed close proximity to the existing habitations is not replicated anywhere else.

d) The proposal to make a community space by demolishing, rather than creatively re-using, the historically important Temple, will have an adverse effect on the character and appearance of the Conservation Area. We urge a rethink particularly in the Applicant’s interpretation of sections of the Camden Core Strategy, The London Plan (2016) and various parts of NPPF, in particular sections 56, 57, 58 and 61.

e) Many details on the Architect’s drawings, and the interpretation put upon them in the Planning Statement, are a) wrong b) inadequate c) questionable and are grounds for objection in themselves.

Detailed Submission .

**Planning Statement 8.17 is a statement of opinion with which we fundamentally disagree.**

**1: The claim in submitted Planning Statement 7.82 that the increase in bulk of the new building will be broken down by being heavily articulated does not bear *in situ* scrutiny. The argument concerning the VSC and Daylight Distribution evaluations in Planning Statement 7.7 is entirely specious.**

Rather,the narrow obscured glazed windows and the vertical steel louvres create a modernist version of a medieval fortress with arrow slits and defensive portcullises. It will be a heavy bulk over 10m high (when seen from the lower ground patios of the houses in Rochester Square, approx. 1 metre beneath ground level) and barely 10 metres from the rear rooms of those houses. We contend it is out of keeping with the ethos of a Conservation Area.

The existing pitched roof of the Temple gives a sense of space and airiness to the rear of the Rochester Square houses. Its removal and replacement with a solid structure will have a major deleterious effect on the quality of the light and the outlook of the adjacent houses.

See also 3 below

**2.1 Planning Statement 7.81 is factually wrong. The entire proposal contravenes Camden’s guidelines in CPG6 of a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other.**

The distance from the rear facing windows of 29 – 36 Rochester Square to the existing eastern boundary of the site is between 8 and 9 (eight and nine) metres not 15 (fifteen) as submitted. The proposal provides a partial buffer (see below) but there will still only be 12 meters between the new building’s windows and those of the houses 29 – 35 Rochester Square. This runs counter to Camden’s guideline of 18 metres between overlooking windows in CPG6 and is unacceptable, especially in a Conservation Area.

**2.2**

**Planning Statement** **7.82 is factually wrong and misleading in claiming the ‘buffer’ provided by the site is 2 metres wide.**

Architect’s plan GA\_033 shows the ‘buffer’ as reducing from 3 metres in front of numbers 36 and 29 to 1.5 metres in front of numbers 35/34 and 31/30

There is no buffer at the site boundary with Numbers 32 and 33.

Numbers 32 and 33 actually have a terrace running up the boundary of the site on the first floor.

Number 35 has a terrace proposed to end only 1.5 metres from the boundary wall. This will directly overlook a shower room/toilet and a living room on the ground floor of No 35 at a distance of less than 10 metres.

The 1st floor west-facing rooms of the existing houses on the eastern flank do not ‘only serve staircases and bathrooms’ (see submitted document DS Report 4.3.1). They are also living rooms and bedrooms. These will be adversely affected and overlooked by the proposed development.

The proposed terraces, even though not actual rooms, are still areas of occupation and will impact heavily on the privacy of the houses.

**3 The views expressed in Planning Statement 7.83 are factually wrong, misleading and contentious.**

Architect Drawings GA\_033 and GA\_034 show that the proximity of the mass of the building and the terraces on both the first and second floors, even with the proposed vertical COR-TEN steel Louvres, however angled, will not mitigate the intrusion on the neighbours’ privacy. The terraces are intended for use, not as decoration. They will need lighting, as will the bedrooms. Even with obscure glazed windows, there will be light and noise pollution affecting Nos 36/35, 33, 34, 30 and 29.

There will be further light pollution from the ground floor plan. Submitted Documents GA\_032 and GA\_063 show full-length, unobscured windows directly overlooking the rear of the houses 36 – 34; in the case of numbers 35 and 34 they will be less than 10 meters away. There is no indication of the height of these windows or of how the interior space will be illuminated. There is no indication of how this luminance will be mitigated. One might surmise from GA\_041 that there will be a wall 2 metres high forming the site boundary but there is no accurate plan or any statement of its construction/depth/lighting. The bricks shown in the mock ups (GA\_063 and GA\_064) are inappropriate and out of character with the old London bricks used on the boundary side walls of the existing houses.

The proposal for additional community space is welcome. But we contend that the architectural proposal pays insufficient attention to its effect on the neighbours. The plan for the Ground floor (GA\_032) shows two public access routes for the Community areas. One has direct access from Rochester Square south. The other, also serving the entrance to living accommodation units 1, 2 and 3, is directly adjacent to the boundaries of numbers 32, 33, 34, 35 and 36 Rochester Square. The visual representation (GA\_064) shows this. However there is no indication of the lighting plan or of any security precautions. Given that an Exclusion Order was recently enforced on the Rochester Court estate; that until recently drug dealing was commonplace on the junction of Camden Mews and Rochester Square; that when the squatters in Rochester Square Gardens were evicted evidence of drug use was found there, it is surely an issue of great environmental and social importance to ensure appropriate illumination and security.

This illumination will cause yet more light pollution to the neighbouring houses and will add to the already extensive adverse effects of the proposal.

Planning Statement 7.44 says there will be, *inter alia*, public performances of literary, theatrical and film events. There will inevitably be noise from the building, from users and from audiences as they arrive and depart; the public access route referred to above is the only external space available for smokers. We note there is no information concerning sound insulation, lighting or facilities such as a refreshment bar in the plans. All of this is cause for objection on the grounds that it will adversely affect the right of peaceful enjoyment of the residents of 32 to 36 Rochester Square. Additionally it will have a negative effect on the residential amenities of the other residents.

**4 We are not confident of the assertions in the Structural Report 8.18 concerning the basement. The report suggests that the plans for the basement are technically questionable.**

The BIA Structural report indicates a lack of confidence. It notes groundwater is ‘*considered* to form a thin but laterally continuous aquifer unit that is *possibly* confined and that it is *considered* prudent to adopt a conservative approach’ to the basement construction. It highlights the problems of damp and the challenges this presents, (see BIA Appendix C(1)) both during and after construction. BIA Appendix C(1) also says that the excavation of the basement *may* undermine the adjacent property and *could* lead to settlement in gardens and damage to buildings and below ground services (our italics). None of that is an unequivocally endorsement of the proposal. Given the history of damp in the houses on the eastern flank and in Julian Court this is especially worrying and is cause for objection to the proposed development.

**We respectfully request that unless the revised plans to be submitted materially address these concerns the Council’s Planning Committee should review and reject this proposal,**

a) on the grounds of it having a major adverse effect on the privacy, outlook, the right of peaceful enjoyment, and the loss of existing views of the residents of 29 – 36 Rochester Square and occupants of Julian Court.

b) on the grounds that the proposed increase in volume and mass and the proximity of the building to adjacent residential properties is overbearing, out of scale for the area and out of character of the existing plot.

c) on the grounds that its appearance represents an unsympathetic alteration to the balance between old and new in a designated Conservation Area, especially in relation to the Victorian buildings it abuts, and creates an undesirable precedent by its disregard of Camden guidelines for residential building.

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