



Ms Sofie Fieldsend
Camden Council
5 Pancras Square
London
N1C 4AG
By Email

17th March 2021

Dear Ms Fieldsend,

13-15 John's Mews, London, WC1N 2PA
Application ref. 2021/0020/P – Letter of Objection

I am writing on behalf of my clients, Mr Richard Morgan and Ms Monica Coombs, the owner occupiers of 24 John Street, which lies immediately to the rear (east) of the application site. My clients wish to **object** to the application, as it will have an unacceptable impact upon their residential amenity, due to the intensification of the use of the site; the increase in the height of the building; the introduction of new, and the enlargement of existing openings on the rear façade; and the provision of amenity spaces immediately adjacent to their rear boundary / private garden.

In particular, we consider the proposals will harm our client's residential amenity by virtue of:

- Overlooking / loss of privacy;
- The creation of a sense of enclosure / loss of outlook; and
- Undue noise pollution / disturbance.


As set out below, this is contrary to policy A1 'Managing the impact of development' of the Camden Local Plan (2017) and Camden Planning Guidance – Amenity (2021).

Our clients also wish to raise concerns with regard to the development's impact upon the setting of 22 – 28 John Street, a Grade II Listed Terrace. Indeed, this is a matter which does not appear to have been given any consideration within the supporting Heritage Statement.

Finally, we would also like to take this opportunity to seek clarification / request further information with regard to a number matters which remain unclear or comprise conflicting detail. Namely, these include:

- Details of the type of windows and doors proposed;
- Details of the windows and doors opening arrangements, and whether any parts of the fenestrations will remain permanently fixed shut;
- Details of whether any windows will be obscure glazed;
- Clarification as to whether the courtyards serving the ground floor 1-bedroom flats are open-air or covered;
- The height of the Juliette balcony railings;
- The details of the materials and finishes.

At this stage we would also highlight that the Design and Access Statement to which the application refers, is not within the public domain. Given the inconsistencies and uncertainty contained within the plans, the Design and Access Statement is of paramount importance to enable us to fully understand the scheme and its design rationale.


www.simply-planning.com

London office
Lower Ground Floor
24 Charlotte Street
London, W1T 2ND

Birmingham office
Suite 204, Cheltenham House
Temple Street
Birmingham, B2 5BG

Cardiff office
214 Creative Quarter
8a Morgan Arcade
Cardiff, CF10 1AF

We would, therefore, respectfully ask that this be made publicly viewable and request that we be afforded an opportunity to comment further on its contents.

The application site has a recent and complex planning history, to which there has been sustained local concern. Whilst we acknowledge that this application follows the recent approval of application ref. 2017/4302/P, the proposed development should be determined on its own merits. Indeed, it is also notable the planning policy landscape has also changed following the adoption of the new 2021 Camden Planning Guidance.

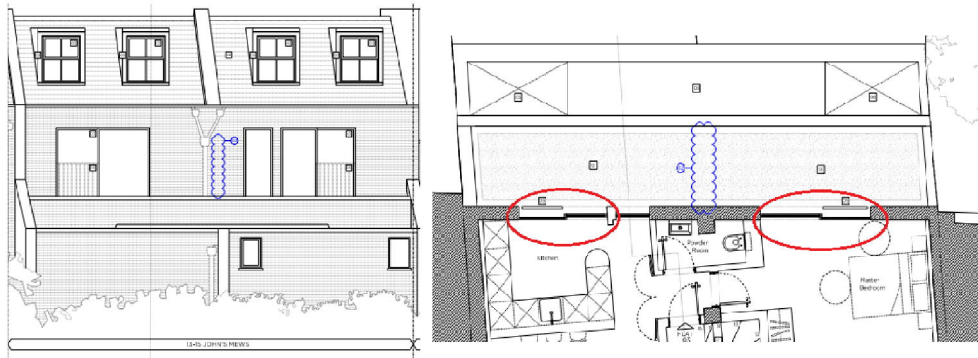
Notwithstanding this, our clients would like to express that the concerns raised as part of their previous objection to application 2017/4302/P, dated 11/09/2017, remain valid.

Inaccuracies in Detail and Points of Clarification

As we demonstrate below, the application is not supported by a sufficient level of information or detail to fully understand the impacts of the proposal. Moreover, some of the details comprise contradictions and conflicting information.

Windows and Doors

The details relating to the rear façade first floor windows and doors are unclear. Indeed, whilst the plans identify the first floor openings as 'Timber-framed French Doors', these appear to be akin to patio / sliding doors (please see the diagram below).



There is, therefore, uncertainty regarding their opening arrangement, appearance, type and finish. Furthermore, there is no information detailing the glazed panel serving the kitchen/hallway.

These details are particularly important to fully understand the impact the development has upon both the residential amenity of our clients and the setting of the designated heritage assets. They should, therefore, be forthcoming prior to the determination of the application and we request that we be given an opportunity to comment on any additional information submitted..



Lightwells

Please can you confirm whether the proposed lightwells will be open air or covered, at this stage we remain uncertain.

Impact on Amenity

Policy A1 'Managing the impact of development' of the Camden Local Plan seeks to protect the quality of life of occupiers and neighbouring residents. It confirms that Camden will seek to ensure that the amenity of communities, occupiers and neighbours is protected and will resist those developments which fail to do so. Amongst other factors the policy considers overlooking, outlook and noise.

Overlooking

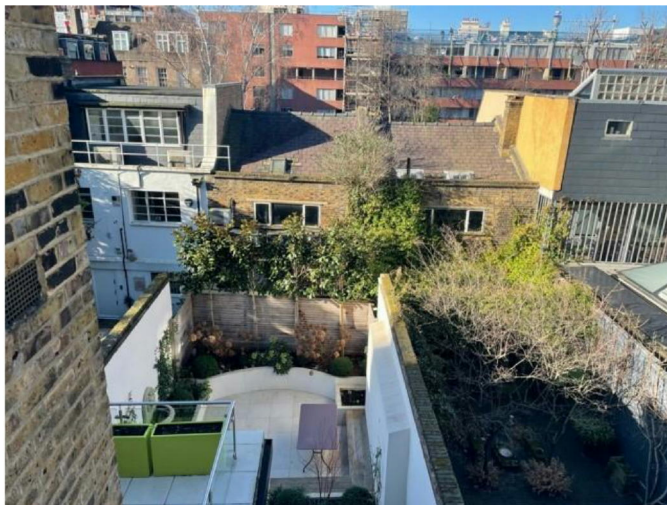
In respect of overlooking and Privacy the Camden Planning Guidance – Amenity (2021), states:

- *Developments should be designed to protect the privacy of occupiers of both existing and proposed dwellings.*
- *Mitigation measures should be included to reduce overlooking.*

In this instance, the proposed development introduces new rear elevation windows at second floor level and significantly enlarges the existing window / door openings at the first floor level. Indeed, the first floor level of the rear façade comprises an expanse of glazing consisting of full height windows / doors.

All of the aforementioned windows serve habitable rooms and directly overlook 24 John Street and its associated private external amenity space. The proposed development will, therefore, substantially erode our client's privacy and will result in a sense of intrusion, contrary to Policy A1 and CPG - Amenity.

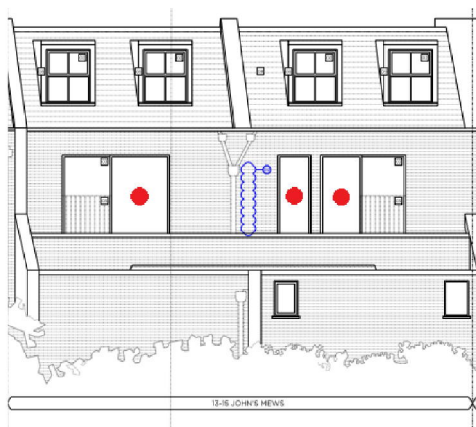
The overlooking relationship to our clients' private amenity space is clearly illustrated in the image below:





Whilst our clients wholly object to the principle of the new and enlarged openings within the rear façade, we acknowledge that a permission for a similar development remains extant. Therefore, should permission be forthcoming, in line with CPG – Amenity, against which this application should be assessed, we would respectfully request that mitigation measures be included to reduce the potential for loss of privacy.

Firstly we would recommend that a condition be imposed to introduce obscured glazing as per our suggestions below (recommendations marked in red):



Similarly we would request that these openings be conditioned to remain permanently fixed shut to further eliminate the potential for overlooking and, as we set out below, to mitigate noise pollution and spillage.

The application also includes a flat sedum roof directly abutting the first floor openings. To prevent the creation of a 'viewing platform' we would request that a condition be imposed to formally restrict the roof from being accessed and used as a balcony / terrace. We would also request that the plans be amended to ensure that the railings serving the Juliette balconies are extended and positioned to run flush to the rear elevation to prevent any gaps which may facilitate access to the roof.

Further to this point, our clients are concerned that the description of development states that the proposals comprise the *"the erection of balconies at 1st floor"*. The wording of the description of development is, in our opinion, particularly misleading and unclear. As such, we request that the description of development be amended to incorporate the following wording: *"the erection of Juliette balconies at 1st floor."*

Noise Pollution

Camden Planning Guidance – Amenity (2021), acknowledges that Noise can have a significant impact on amenity, quality of life and wellbeing.

The proposed development gives rise to the potential for significant noise pollution / disturbance owing to the intensification of the use of the site and the proximity of new openings to our client's property. Furthermore, should the proposed lightwells be 'open air', this will result in the creation of 2no. external amenity spaces, immediately abutting our client's rear boundary and outdoor amenity space / seating area. The courtyards will be surrounded



by hard surfaces and will create a tunnel effect, this will fail to absorb noise spillage and, instead, will exacerbate the issue. The courtyard spaces did not comprise part of the consented scheme and our client strongly objects to their inclusion as part of this application.

The introduction of residential uses in this location, coupled with the creation of new larger openings on the rear façade of the building, will introduce significant levels of noise spillage from more regular sources and for longer periods of the day than that of the current use. This will result in undue disturbance to the detriment of the quality of life and wellbeing of our clients and thus, will conflict with Policy A1 of the Local Plan.

We would emphasise that the concerns relating to noise, should not be viewed in isolation, however, should be considered holistically, owing the cumulative impact that noise spillage from various sources will have of the amenity of our client.

Again, notwithstanding our objection, should permission be forthcoming, we would request that a number of rear elevation openings are conditioned to remain fixed shut in perpetuity (please see above). We would also request that the lightwells to the first floor units be glazed to prevent noise spillage and disturbance.

Heritage

Policy D2 of the Camden Local Plan states that the Council will *"preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings."*

Whilst the application is supported by a Heritage Statement, this fails to assess the development's impact upon 22 – 28 John Street, a Grade II Listed Georgian Terrace. Indeed, the Heritage Statement fails to identify or make any reference to the listed status of the neighbouring terrace.

In our opinion, the proposed development neither preserves nor enhances the conservation area or the setting of the listed terrace. In particular, the rear façade fenestration detailing and the size of the openings at the first floor level introduce modern features which fail to respect the historic rear profile of 22 – 28 John Street.

The introduction of a flat sedum roof addition also introduces an alien feature which is juxtaposed to the Georgian character of the listed building.

Overall, by virtue of the proposed window arrangements, architectural detailing and the introduction of modern features, the proposed development would cause significant harm to the setting of 22 – 28 John Street. The proposals therefore, fail to comply with the requirements of Local Plan Policy D2 and wider national guidance pertaining to heritage assets.

Summary

As set out above our clients strongly object to this application and consider that it should be refused on the basis of residential impact, harm to the character of heritage assets, and the failure to provide sufficient and clear information to fully understand and assess the proposals.

We consider, therefore, that the development conflicts with policy A1 and D2 of the Camden Local Plan and Camden Planning Guidance – Amenity (2021).



Notwithstanding this, should permission be forthcoming, we respectfully request that our recommended conditions, amendments and points of clarification are addressed accordingly and given due consideration.

Yours sincerely,

A solid black rectangular box used to redact the signature of James Hodgkins.

James Hodgkins

Senior Planner