



Phillips Planning Services Ltd.

Town Planning and Development Consultants

PW

08 July 2021

Laura Hazelton
London Borough of Camden
Development Control & Planning Services
Town Hall
Argyle Street
London. WC1H 8ND

Dear Laura

Garden Building at 111 Frognaal Ref 2020/5992/P

As you are aware we act for Mr & Mrs Stern, the owners of 109 Frognaal and Mr & Mrs Finegold, the owners of No.113 Frognaal.

Thank you for the opportunity to provide further comment on the amended proposals following our letters of 23 April 2021 (initial scheme) and 21 May 2021 (amended plans).

Comments on the Amended Plans

As you will recall our clients raised a number of concerns regarding the amended garden building as set out in our letter of 21 May 2021. In very brief summary these were:

1. The visual impact of the proposed garden building with reference to its height and location, the large glazed openings to the front and sides and the rooflight running across the centre of the roof.
2. That the building would represent a detracting feature within the setting of the Grade II* listed building and harm the character of the conservation area, particularly in private views from our client's gardens.
3. The potential for light pollution at night in an otherwise dark area of garden due to the large scale of the glazed openings proposed.

The amended plans do reduce the footprint of the proposed building by removing approximately 1.5 metres from its depth and 0.5 metres from its width and the front and side windows have been narrowed.

However, the proposed building remains an extremely large structure. It has an internal floor area of 35sqm. By way of comparison, as you are aware a new one bedroom apartment has a minimum floor area requirement of 37sqm so this building is similar in scale to a one bedroom home. The windows also remain extremely large, full floor to lintel size and so remain very prominent elements, uncharacteristic of what should be a low key, ancillary building. Significant light will be omitted at night from these windows and the large rooflight.

As a result, our clients' three main concerns as set out in our 21 May 2021 letter are not resolved by the amendments and those objections remain.

New / Additional Concerns

In addition to these matters, in reviewing the latest submitted drawings we note that in addition to the proposed garden building the application now includes a proposal to create a new access through the garden wall into the garden from the rear pathway.

This will involve some demolition / removal of the listed boundary wall.

This was not proposed originally when the application was submitted. This element of the proposal is not therefore mentioned in the application description on the application form, nor on the description used by the Council on the website and public consultation.

As you may be aware the omission of a material element of this nature from the application description and Council consultation process is a matter which could form a subsequent challenge.

We would suggest that either the application description should be amended to include this element and a re-consultation undertaken or this element is removed from the application.

Construction Issues and Level of Detail Provided

Linked to the above point, the amended proposals show a difference between the previous plans and those currently submitted in terms of the way that the proposed building roof adjoins the boundary wall. As you will note, when the first set of amended drawings was submitted the roof was shown to sit behind the boundary wall. It is now shown to incorporate / sit over the top of the wall. This would create an unusual detail with the top of the wall being lost within the building. It would also require the provision of some form of gutter along the wall overhanging the shared pathway at the rear.



Objection is raised to this element from an aesthetic and heritage perspective and we question whether if a gutter is required this could be provided on the applicant's land or if it would overhang the pathway. If there would be an overhang a notice would need to be served on the path owner and certificate B of the application forms completed. The current submission includes certificate A only. We ask that this is clarified.

Further, the drawings presented do not show adequate detail, given the listed building context, of the materials proposed to construct the roof, including the adequacy of the fall of the roof to contain the proposed 'green' roof covering and also the visual appearance of this roof – technical specification of the green roof system proposed should be provided. There is also inadequate dimensional information provided on the drawing, including levels for the finished floor level of the proposed structure, surrounding ground levels and the level of the uppermost top of the glass rooflight, which is essential to relate the building to its context and also to provide an indication of the height of the structure.

We ask that the applicants provide a topographic survey of the site including the existing structures in order to properly assess these aspects.

Listed Building Consent?

Finally in respect of both the proposed new access through the wall and also the proposal to link the roof of the building over the wall, we suggest that at this wall forms the curtilage of the listed building, a listed building consent application should be required alongside the planning application. I am unable to see any listed building application on the Council's website search system, (apologies if I am missing this). The application as submitted appears to have used a standard householder form. We therefore also ask that clarity is provided on this matter.

Conclusions

The proposal as presented remains of a scale and design which is unneighbourly. It will harm the outlook from our clients' properties, appear prominent and draw the eye when lit up in the evening and at night and result in actual overlooking as well as a very real perception of overlooking from the large glazed windows to the front and sides.

By virtue of its scale the building would be an incongruous addition within the setting of and compete with the Grade II* listed building, the former home of the eminent sculptor Sir Anthony Caro.

Concerns are also raised regarding the proposed second access gate in the boundary wall (not mentioned in the application description) and also the way in which the proposed roof would now incorporate and sit over the boundary wall.

Our clients ask that the application is refused for the reasons set out.

Yours sincerely,

Paul Watson
Phillips Planning Services Ltd