



HERITAGE ARCHITECTURE LTD.

Architects & Heritage Consultants

April 2025

11 Cannon Lane, London, NW3 1EL

OBJECTION - TO LISTED BUILDING CONSENT APPLICATION [2025/1074/L & PP-13785384]

On Behalf of Mr & Mrs Wright, Cannon Hall.

1. INTRODUCTION

- 1.1. Stephen Levrant Heritage Architecture have been commission by Mr & Mrs L Wright of Cannon Hall a grade II* listed property adjacent to the subject site, to register an objection to the application for Listed building consent, submitted to Camden council by Ms Serena Mignatti.
- 1.2. This objection is written by Stephen Levrant RIBA, AA Dip, IHBC, Dip Cons (AA) FRSA, principal of Heritage Architecture Ltd, a multi-disciplinary practice of Architects, surveyors, Conservation Consultants, historians, townscape planners; working exclusively in the conservation and historic cultural environment. Some 24 staff work from three offices in UK on a wide range of projects in practical construction and design; and advisory capacity. Stephen Levrant has got over 40 years of experience in the field, completing over 2000 projects including many appeals, Public Inquiries and technical/design/construction experience. The practice has been engaged for some time in works to Grade II* Cannon Hall the adjacent property, to which the subject listed wall and lock-up originally formed part.

2. OBJECTION POINTS

- 1.1. The objection is predicated upon the following main issues:
 - A. There is insufficient information to enable Camden council to determine this application;
 - B. The information provided is poor quality and misleading and lacking in important detail;
 - C. There are concerns, based upon recent damage caused to Cannon Hall by contractors, that there is a very real risk of further damage to our clients' property through lack of construction manage experience in conservation works.
 - D. There is no Construction Management Plan. This is essential. Cannon Hall has already suffered serious damage from a contractor's large vehicle reversing into the wall of the house. This has caused structural damage which is now in the process of specialist repair. The

attention of a Banksman and a traffic management strategy, would have prevented this damage.

1.2. The application is for:

“Repairs to the Grade II listed boundary wall and the reinstatement of an existing timber outbuilding roof supported by the listed wall”.

3. THE APPLICATION FORM

- 3.1. We believe the application form may be technically incorrect, and if so, – invalid.
- 3.2. The applicant is given as a company in the name of Serena Mignatti. We can find no UK registered company of that name.
- 3.3. The answer to the question *“Do the proposed works include alterations to a listed building?”*
- 3.4. Was given as “no”, whereas the works to the wall go beyond “a like-for-like- repair” and therefore, are alterations. Any fixings into the structure will constitute alterations, as will the introduction of the proposed steel reinforcement and the removal of fabric that pre-dates the listing as well as the new under-roof build-up. (v.i.)

4. THE HERITAGE STATEMENT

- 4.1. The application is supported by a Heritage Statement written by Anne Roache MA MSc. of KM Heritage, (henceforth: “Roche”) a company founded by Kevin Murphy, a conservation architect, previously with English Heritage for many years. We believe he is no longer actively involved in the company. Ms Roache does not appear to be an accredited member of IHBC, nor possess qualifications and experience of architectural, structural or constructional matters, stating that “She specialises in the architectural and social history of London”.
- 4.2. Her report does not mention for whom it was commissioned; nor when. It is not, therefore, clear as to whether the report was produced prior to the works being formulated, so as to inform the design process; or whether it was produced subsequent to the works extent and scope being determined and thus is in the nature of a “post justification”. The report is silent upon this point in respect of compliance with the NPPF para 207 (Roche 3.9) which refers to applicant describing the significance and the ability to understand the potential impact of proposals. We believe it is implicit that such understanding can only be effective if a significance appraisal is carried out before the scope of works or a design is formulated, so that any potential adverse impacts can be addressed. There is no evidence that this process was carried out in this application.
- 4.3. There is no indication that the adjoining grade II* Cannon Hall and its curtilage have been assessed in this Statement.
- 4.4. There is no bibliography or sources of reference, and therefore we suspect that no archival research was carried out. The factual content of the Statement is limited in content and whether it accords with “proportionality” in respect of NPPF 207 is questionable. There is no exposition of the archaeology of

the wall, or the lock-up; there is no basic map regression that may assist in understanding the significance of the wall and lock-up; and of the walls to the adjoining Cannon Hall. There is no explanation or assessment of the significance of the in-built timbers of the wall and the iron work. From the photographs these appear to be of considerable age, and the in-built timbers may be contemporaneous with the construction of the wall. A basic map regression may have revealed if there were earlier structures built adjacent or upon the wall and so help determine the significance of the remains, decayed through they may be. We do not intend to repeat or amend the contents of the Heritage Statement, the LPA must decide if sufficient information is given to enable them to properly assess the significance of the heritage assets and if their treatment by the works is appropriate in the determination this application.

5. POLICY

- 5.1. Local and national policies are copied onto eight pages of the Heritage Statement, but the compliance with all the policies quoted is not demonstrated. Some policies are addressed in later sections. (v.i.)

6. THE PROPOSED SCHEME

- 6.1. Local and national policies are copied onto eight pages of the Heritage Statement, but the compliance with all the policies quoted is not demonstrated. Some policies are addressed in later sections. (v.i.)
- 6.2. This is presented as a description of the issues of the wall as if imparting first-hand knowledge, but the information appears to be taken from the Elliott Wood Structural Engineers' reports, only mentioned *en passant* at 4.7. The elements that are given as in poor or questionable condition and the remedies, are thus unqualified and unjustified. There is no indication of the makeup of the existing fabric and its date.
- 6.3. At 4.5 reference is made to possible need for further intrusive works, such as soil stabilisation or ground anchoring; but details of that are not submitted in this application. As the Heritage Statement is an intrinsic and compulsory document in the planning process, the LPA must specifically exclude any such works, should it be minded to recommend granting listed building consent, based on the poor information presented, otherwise such further works may be deemed to have consent by inclusion here.
- 6.4. At 4.6 Roche states that a new roof structure will be constructed of "the same profile and materials..." This is incorrect. The detail shown of the new roof construction within the Enbuild Contractor's method statement shows a different structure and build-up and different fixings. There is no certainty that new fixings will not cause damage to the historic structure. This is further addressed in response to the contractor's Method Statement (v.i.).
- 6.5. The proposals at 4.8 mention, in outline, the content of the contractors' and structural reports; and the information in the Heritage Statement is therefore as deficient as in those documents. These details will be addressed in response to those reports below.

- 6.6. At 4.9 *et seq* gives the “effect of the proposed scheme on heritage significance” and gives further cause for concern, as it merely reiterates the proposals and draws conclusions without justification and without due regards to the facts.
- 6.7. There is no doubt that the works will improve stability and structural integrity; but there is no evidence that the works will “improve... appearance and of (*sic*) the listed wall.” This is questionable, if not just incorrect, when considering the lack of information about how such works will **actually** be carried out and their extent. If the method statements are to be taken *verbatim*, the result will be a patchwork of old and new work with no certainty there will be an empathetic “match” and there will be a change in appearance when viewed from the public realm. No measures have been taken to correct inherent defects in water run-off, with subsequent staining, on the face of the wall. This will have an ADVERSE impact on the significance.
- 6.8. The extent of works is unknown, and undefined, despite the conservation “specialist” providing a fixed price for 10 weeks of work.
- 6.9. At 4.10 the Heritage statement states that “*careful repair will be carried out on a like-for-like basis consistent with the historical construction methods of the period.*” What period? This statement is not borne out by the method statements provided, which are lacking in information and detail. There is no certainty that repairs will be “like-for-like” as there has been insufficient analysis and detail. This is further addressed in response to the method statements etc of Building Conservation (UK) Ltd below.
- 6.10. It goes on to say that: “*remedial interventions will help to resolve the problems of damp penetration into the wall*” this is also questionable, if not impossible, as the wall is solid brick construction; and, as an external structure, would have been damp since construction, and no weathering other than the lead covered coping, is proposed. The structural report states that further specialist advice should be sought to determine the cause of damp. Merely pointing and replacing damaged or eroded bricks will not prevent damp ingress.
- 6.11. At 4.11, it is not clear if the monitoring of movement will be “checked”, as in noted and recorded; or whether “checked” in the sense of any such movement being stopped. If the latter, there is no indication of what interventions might be necessary to achieve that.
- 6.12. At 4.13 further unsubstantiated claims are made that the works will preserve and enhance and there will be no affect on the special interest. None of this is proven or justified.
- 6.13. At 4.14 it is stated that the works “will have a positive effect upon the conservation area...”. This is not proven and is doubtful due to the detailing proposed and the risk that the works will not be of appropriate standards and scope.
- 6.14. At 4.15 Roche states that the documentation submitted “sets out a careful programme of repairs along with detailed methodologies for carrying out the works.” This is not borne out by the documents in any way, and contrary to this, the sparse detail provided give cause for concern, if not alarm.

7. COMPLIANCE WITH POLICY AND GUIDANCE

- 7.1. In contention of Roche para 5.11; we maintain that less-than-substantial-harm will be caused if the works are carried out as specified in the method statements of the two contractors; and, to a degree, by what is recommended by the structural engineers. Therefore, para 215 of NPPF is engaged. The other documents quoted must therefore also be regarded in this light in determination of this application.
- 7.2. At para 5.12, Historic England's 5-step process is stated as being followed, but this not obvious from the proceeding as much of the conclusion and argument is based upon false premise.

8. CONCLUSION OF ROCHE

- 8.1. We disagree with these conclusions as not proven, not substantiated and misinformed.

9. BUILDING CONSERVATION (UK) LTD

- 9.1. This company have provided three documents to be considered as part of the listed building application, viz:
- **Safety Risk & Method Statement - Assessment**, dated 14th February 2025;
 - **Data Sheet - Pointing & Mortar**, dated 14th February 2025;
 - **An estimate for the works** dated 25th February 2025.
- 9.2. **The Methods Statement** gives the work as taking from four to ten weeks, a very large margin of tolerance and this gives serious concern as to the extent and scope; which is not defined.
- 9.3. Materials have no provision for approval of samples either from yourselves as council or by the Architects.
- 9.4. The method statement is nothing of the kind and does not detail how the works will actually be carried out.
- 9.5. **Data Sheet**: this purports to give greater details as to specification, although that is not defined. There is no indication of the ratio (by volume) of the mix other than "1:3", nor of the aggregate intended.
- 9.6. There is no provision for samples to be matched of either bricks or mortar. The process should have samples of mortar analysed so that the original mix and aggregate can be identified and properly matched. Without that there can be no "like-for-like".
- 9.7. The preparation "will be determined by the purpose and application of the mortar." This must surely be known before starting work?
- 9.8. There is no method statement of how the mortar jointing will be applied and finished. This is vital to ensure both appearance and durability.
- 9.9. **The estimate** gives some more detail but is not conducive to inspire confidence in this company.
- 9.10. The work is given as
- Cut back all the defective laminated brickwork, cementation pointing, render to the external walls external brickwork from brick buttresses, to extend a further 35 lineal metres.*

- 9.11. There is no indication as to how this is to be done without damage to the bricks, nor the extent of “cut back.”
- 9.12. How are cut bricks to be repaired? There is no information.
- 9.13. What is “Cementation pointing”? How is it to be cut back?
- 9.14. There is no prohibition on use of power tools for cutting back, and no mention of raking-out for repointing.
- 9.15. No indication of how render to be removed and what will be the treatment of the exposed brick surface following that.
- 9.16. What is the meaning of “*to extend a further 35 lineal metres*”? Further to what? The extent of work is not defined or shown.
- 9.17. The contract period on this document is given as “2 months” whereas previously it is given as four to ten weeks (v.s.) again indicating that the re is no understanding of the extent of the works.
- 9.18. The information provided by these documents is insufficient to define and understand the works; the presentation of the documents is lax and inaccurate; we would therefore have grave doubts that such a company would not be suitable to carry out works to a listed structure.

10. ENBUILD CONSTRUCTION METHOD STATEMENT (dated 26 February 2025)

- 10.1. This company are NOT historic building or conservation contractors, hence the need to employ as sub-contractors the services of Building Conservation UK.
- 10.2. There is no indication of the extent of the work.
- 10.3. There is only one detail provided, viz: “Detail A-A” showing a section as proposed through the wall. A section as existing is provided only as a rough sketch in the Elliott Wood Report.
- 10.4. Scaffold is proposed to be fixed using resin anchors – this is a non-reversible process that will cause permanent impact upon the wall. Such fixings are never permitted on listed structures. It is proposed that a detailed design for temporary works will be carried out before commencement, so there will need to be an approval mechanism; or matters reserved by conditions. (v.i.) It seems that the bricks affected are to be replaced, and although there may be a substantial number of bricks that are to be replaced overall, this adds to that number, and will be obvious as replacements.
- 10.5. There is no indication of the extent and area of affected brickwork,
- 10.6. no provision for bricks to be marked or selected for removal or repair;
- 10.7. no provision for any conservation “plastic” repairs where the majority of the brick is sound.
- 10.8. The detail is questionable:-
The fixings for the “marine ply” base for the lead are not specified, the date and type of the existing brick coping is not defined and so may be subject to further damage.
- 10.9. The “metal support” for the flashing is not shown or specified, nor how it retains the lead.
- 10.10. The lead bay widths are not shown or detailed.
- 10.11. The joints in the lead bays and seams are not specified.

- 10.12. The DPC is pierced in numerous locations by the fixings and the extent is unclear apparently covering only part of the coping soldier-course.
- 10.13. There appears to be no damp protection for the (unknown) under-roof build up where it meets the external wall.
- 10.14. There is a diagonal dashed line rising from the top of the copper at the point where it is covered by the lead flashing and meeting the corner of the flashing – what is that?
- 10.15. There is no indication of the roof build-up beneath the copper, all of which is new and therefore does not conform to “like-for-like.”
- 10.16. The lead flashing over the capping is shown as one piece, and is in code 6 which makes it very difficult, if not impossible, to dress over and incorporate (unspecified) jointing in bays, as shown. It is usual in traditional work to have a two-piece flashing/cap detail for that reason, which also allows for more efficient movement in temperature changes.
- 10.17. There is no weathering indicated on the new coping detail. Although this may not be present in the existing detail, a very simple alteration would greatly extend the life of the detail and minimise run-off staining to the wall in the absence of any drip.
- 10.18. There is no detail, specification or methodology for installing brick-joint reinforcement, which is mentioned in both the Structural Engineer’s report and the Heritage Statement.
- 10.19. There is no detail of the junction and treatment with the wall of Cannon Hall in this document although it is included in the Structural Engineer’s Statement. These are needed to assess the exact detail and junction required which is different to that for the boundary wall.
- 10.20. There is no reference to the structural Engineers’ details and drawings and they differ substantially from the detail included in Enbuild’s document. Critically, the restraint straps deemed essential by the engineer, are not included and the details of construction and materials are omitted.

11. CONCLUSION/SUMMARY

- 11.1. The information provided for determination of this application is deficient, misleading and inept. This gives rise to serious concern of risk to the listed structure.
- 11.2. Should the council be minded to grant listed building consent, we strongly urge that a very comprehensive schedule of “conditions” is imposed. However, from the standard of documentation submitted, we doubt that the contractors involved have sufficient and appropriate expertise to carry out the works satisfactorily to this listed structure.
- 11.3. Should the council grant consent without the necessary safeguards for the listed structure, our clients reserve the right to instigate legal challenge to that decision.

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