

Hampstead CAAC (HCAAC) is concerned at the possibility of this scheme's any consent, for reasons which we list and analyse herein. One reason no doubt suggesting demolition of the existing is the imposition of VAT on works to existing buildings against nil VAT on new build. We consider nothing else about the proposals recommend it.

We also refer to a number of objections and reports submitted to Camden by individuals and organisations with the majority of which we agree. These considerations should override the supposed financial viability of demolition and rebuilding which we believe should be stringently tested in examination of a developer's alternative analyses.

Our reasons for objection to the proposals are:

1. Demolition of a local asset, positive contributor to the street and the CA; developers routinely denigrate the existing, ignoring the social value of a building as of its time and its place in our society and the CA;
2. Removal threatened thereby of an element of local cultural and social history;
3. Developer's unwarranted dismissal of the status of the original architect and builder; dismissal of the existing building's qualities and potential;
4. Misleading description of the existing building as impediments to continued use; no attempt to assess viability of adaptation and re-use;
5. Harm to the CA by copying today valued buildings of their own time, pretending quality and equality;
6. Stated use of attempted copies of traditional building details supposed to achieve consent; no detailed drawings offered; craftsmanship mentioned, unlikely to be employed;
7. No offer of quality building of our time - 3,4&5 above an insult to the area;
8. Overdeveloped footprint and massing relative to accommodation, poor planning, not high quality design.
9. No urgent need for 'premium' housing in the area to warrant demolition and sub-standard design;
10. Basement car parking questionable; no PTAL access rating; confusion over proximity of public transport but cars still required;
11. Sustainability; architect's objections inapplicable and not studied by the architect despite the existing building's capacity of adaptation to enhance.
12. Some existing trees unnecessarily threatened by the building footprint extension.
13. Architect's D&A statement inadmissible - repeats other unconnected material, fails to describe and analyse the new proposals, let alone explaining the lack of examination of the existing building and adaptation trials, generally erroneous and misleading.
14. Planning statement unacceptable, challenged on a number of counts.

We also note the somewhat bloated nature of the applicants' other repetitive statements amounting to an attempted paper ambush of officers.

1. Demolition

Developers routinely denigrate the existing their demolition target hence the lengthy Heritage Statement which others have demonstrated to be in error and the D&A Statement para 1.3.

We agree with assessments challenging the basis of the attempt to justify demolition.

The developer has not looked carefully at the existing building its provenance nor its potential for renovation to expose the A&C features described by Dr.Dutton-Parrish.

The stated lack of Camden's inclusion of no.28 in the latest Local List is also used to justify demolition, ignoring the absence on the local list of very many buildings which whether individually or in groups are the basis of the strong good character of the CA.

2. Threat to local history and identity.

Buildings are treasured above all for their associated history of the persons families and activity they have accommodated as part of the area's social and cultural history and development.

We believe with others that such history must be sustained in the area and buildings. For instance while there are 'blue plaques' stating '..... lived in a house/building on this site', they are few compared with those that declare '.....lived here'. Local identity does not necessarily require plaques as the knowledge acquired by residents sustains the community affording further reinforcement of the high quality of their area. Suddenly, a new building of a different type is offered as a contributor somehow in place of that long-acknowledged but to disappear.

3. Dismissive of the building's original architect and builder and of the existing building;

The existing building's quality is questioned by reference to un-evidenced dismissal of the stature of the original architect. We question this as the basis of denigration of the existing building bearing in mind its prominence and contribution to the area's high quality; we look to see in that case if the same criterion is to apply to the designer and design of the replacement proposal. Assurance of competence is not offered and we have no reference to the architect's ability to execute any high quality building. D&A Statement section 5.5 reverts to a repetition of the denigration of the existing building, repeating developer's opinion un-evidenced and having nothing to do with the design brief for the new building.

4. Misleading description of the existing building as impeding continued use.

The applicant fails, in the D&A Statement, to explain properly what are considered to be impediments in the existing building to retention and continued use. Plans of the existing are shown but in no way explained or analysed. Given the standard developers' ploy simply to denigrate the existing as tired at great and repetitive length in the applicants' statements, the perceived problems would need to be properly examined. Instead a lack of facility is merely implied by listing what the proposed replacement would offer.

2.3 – raised main entrance restricts staircase, access.....insulation,

3.7 – finally gets down to describing features of the new building that supposedly cannot be achieved in the existing building. No figures or constructional examples are offered to support this assertion - Lift, staircase, wide corridors (unnecessarily wasteful), Lifetime Homes standard (at what level ?), more cohesive spatial layouts.....

This section ignores the considerable and imaginative work and results of many designers in transforming older buildings to excellent modern usefulness and attraction without damaging, indeed most often enhancing, the fine characteristics of the original. The architect may or may not be up to such a task, the developer apparently hasn't time money or patience to explore as some imaginative developers manage. The Statement does not refer to what should be apparently the key report on sustainability. See our comments on this below.

3.8 – but the architect has had enough of the claimed impediments and non-detailed counter-provision, apparently, so back to antecedents and copying externally.

5. Harm by copy following demolition.

The developer lays great store by the promise to copy existing forms and details in the CA. While imitation might be regarded as the sincerest form of flattery, that kind of false acknowledgement is not needed in the CA. Buildings are valued as being 'of their time' and we agree with others' perception of the dilution of the heritage by such blatant even if apparently competent copying for consent. The D&A Statement mentions high quality materials and craftsmanship, the latter offering not generally available in the present day nor applicable to developer's schemes in general for obvious financial reasons. As such, new buildings not of their time but so pretending and using ad hoc collection of 'traditional' details can not be welcome, in fact offer harm in their fakery to the CA. The D&A statement refers to rooms planning 'responding to the external fenestration' whereas in truly high quality design, the opposite is the intention as happened in the century-old buildings in the CA, hence their valuable diversity and originality.

6. Details to support the copying.

Fine elevation drawings briefly annotated and water-colour renderings are submitted to show proposed façade details. However, no detailed drawings are offered to support the assertion of authentic copying in original materials. There is a natural tendency in new developments to water down the dimensions and depth of those elements as well as to vary the final materials used. 'Stone' becomes thin-section natural stone or through-colour resin concrete at best, GRP at worst. Details in the existing and similar buildings rely for the most part on secure 'building-in' to the main external structure of solid brickwork. Such apparent details in new build will be 'attached' to the main structure whether of steel or concrete frame or shell. As such, craftsmanship resides mostly in the factories inevitably producing such applique elements whether as bespoke or catalogue items. A common example of loss of 'original quality' is in the face bonding of

brickwork, no longer of the 'Flemish' or similar variegated brick placing, but plain cavity wall facework of visible monotony, often in these days of specialist manpower shortage being pre-cast on cladding panels. Confusion rests between the coloured elevations and renderings showing alternatively the two face-bonding types. The track record of the scheme's architects does not show expertise in production of traditional building elements. One renovated simple Georgian facade is shown on the website, a different undertaking from that proposed as replacement for a major house in the CA.

7. No offer of quality building of our time.

Although demolition of the existing building is unwarranted, were replacement to be proven as justified it would be better to offer a quality building design of our own time as done in many places in Hampstead and elsewhere, so as to match the excellent production of a century earlier. A problem would be that developers do not use architects of the standing required to produce recognisably high quality buildings. The architect for this scheme offers on its website more strident buildings following the fashion common among developers' architects, unwelcome anywhere in the CA. Similarly a modern extension to the existing building, if justified for accommodation, should rise above such lowest-common-denominator design offering. HCAAC is not confident this architect can offer such a good deal.

8. Overdevelopment in the new proposal and poor planning.

The architects are strangely at odds with this scheme – external 'heritage' wallpaper concealing the most dis-organised planning. The proposed footprint greatly exceeds the existing without apparent justification and lacking any explanation or plans analysis in the D&A Statement. Accommodation is described only in general as flats 'well-appointed' which we see means oversized spaces, questionable allocations and decisions, inconsistent planning between different flats.

Drawings

Plans generally trying to justify over-developed envelope, apparently high-end money planning, not high quality design claimed in the DAS, not trying to plan 'urgently-needed housing' into a tight locally-valued site.

Site plan - missing a ramp to the basement. Hides likely cutting into existing street front planting for a ramp alongside the forecourt entryway. According to the section the ramp would have to be approx. 1:6 from back of pavement which is questionable access. Incomplete drawing – dismiss.

Plan Basement – Similarly ramp to basement hinted not shown. Confused priority of car parking over other spaces. Oversize impractical garage half due to bad planning in the remainder. Bikes in an inner room through lift + 2 doors, better available closer to the undeclared ramp. Bin store enclosed unventilated room from which someone (who ?) has to pull bins up non-existent ramp to the site front or by lift to main entrance ? Unexplained plant room further bulking space to justify a low-quality unnecessary basement plan. Front ancillary rooms for 1-bedroom flat 01 ? more wasted space, Drawing incomplete – dismiss.

Plan Ground floor – confused, excessive, yet also unnecessarily constrained, the first sign of screwing rooms planning to excessive external form and elevations if indeed as stated in the DAS rather than the correct opposite. A lengthy wasteful front-rear flat 02 relies on lightwells – 2-bedroom flat with 2 living rooms ? Entry hall wasting space. Multiple 'en-suite' bathrooms, suggests hotel planning rather than family flats, although excessive spaces given to those and bedrooms. Dressing areas for 1-bedroom flats ? Living rooms face northeast, albeit to the retained woodland, bedrooms face southwest the opposite of normal planning, introducing risk of a/c need. Rear terraces enclosed, constrained, irrelevant, due to footprint stretch into rising ground. 01 entry through tight dining & kitchen area. 02 wasteful corridors, massive dressing area,

Plans 1st floor – continues the over-generous but inconsistent room allowances, stretched planning, 03 has entrance at the bedrooms end, long narrow corridor walk to living room, down long single flight to dining.

Massive dressing area, tight coats, guest wc, no utility, en suites to all bedrooms. 04 smaller MB dressing area, decent utility, tight rear terrace.

Plans 2nd floor – tight rear balcony and terrace, tight utility cupboards.

Plans 3rd floor – massive dressing areas, ‘back of kitchen’ = oversize utility ?

Plans 4th floor – first storage, winter garden suddenly appear.

9. Need for additional housing in the area not urgent as claimed.

Prime well-appointed flats are proposed, affordable housing appears a more urgent need for young professionals and others but is not required for such small schemes. Therefore the issue is of over-design and random spatial allocations and enlargements (not cohesive as suggested) to bulk up the envelope. If ever consented, the same envelope would be used for 9 or 10 flats which might be regarded as attempted earnest provision. This is an investment-only building, speculation not even matching the grand scale of speculative and bespoke building of 100-150 years ago.

10. Basement car parking questionable.

No cogent case made for the basement car-parking which drags with it bicycle storage always preferred at ground level, now apparently needing lift access, complication anathema to bikers. The existing car parking and added bike provision in the front forecourt apparently not acceptable to the building’s residents, although common in most flats developments in this and other areas.

For transport, on the one hand stating good connections to public transport, on the other requiring full on-site car-parking to justify a basement, not having explored retention of existing provision.

11. Sustainability

D&A Stat sustainable and Lifetime Homes – standards withdrawn by government. Syntegra analysis seems not to support.

Sustainability is emphasised by the designers in parts of the D&A Statement as an important difference between retention of the existing and a proposed new building.

What is not discussed is the Syntegra sustainability report which is another lengthy apparently highly technical support and separate document; it would be expected to support applicants’ claims of their proposals’ sustainability. Syntegra catalogue at length at the great spectrum of technology available as if to be applied to this development. However, they state most of the carbon reduction or lean/green/clean facilities available would not be used in the new scheme, itself due to site constraints, conservation area restrictions or exemptions etc. Those facilities the proposed new building would use can well be used with the existing building – roof and wall insulation and double glazing, ground source heat pumps, P/v generation, efficient heating and ventilation.

Nothing of the proposed external resources or equipment, eg. P/v panels, are drawn or mentioned in the DAS.

The Syntegra document does not at all attempt to assess the existing building nor prospects for use with the technology of sustainability. Again, the best developers and many more designers manage to include in older buildings measures for better building performance, but not this team apparently. The notion that sustainability can only be achieved by demolition and replacement is unacceptable and if applied generally would lead to the destruction of the area’s heritage.

12. Trees survey unacceptable if development requires loss of or risk to trees – reliance on the rear garden woodland as compensation. The building foot print should be reduced to protect adjacent trees. Retain and maintain rather than replace, avoid sanitisation of rear wood threatening wildlife. Access and sitting

essential, major landscaping and/or planting additions may not be desirable if not compatible with wildlife or existing woodland retention. Report not studied – HCAAC position reserved.

13. Architect's D&A statement.

This document should be a thorough analysis of the proposals. Instead, following drawn-out team analysis much space is devoted to repeating the Heritage Statement and other material as in para 1.3 existing building, and paras 2.1-2.4, 2.7-2.10, locality transport etc. Introduction to the design brief, finally appears in para 3.1, the statement reverts to repetition in trying to justify demolition, para 3.2, then returns to the existing street, para 3.4. The latter has nothing to do with the planning of this block which does not resemble any of the houses mentioned. Section 5.5 reverts to the irrelevant laboured and again repeated description of the claimed problems with the existing building. No analysis of any attempt to design for a community-acceptable solution.

The access description again repeats the local transport infrastructure, much as flats' sales brochures emphasise. This has nothing to do with concerns about universal access to the proposed new building. The one thing militating against universal local access anywhere is the sharply varying up/down topography of the Hampstead area. The existing building is criticised for lack of universal access – the proposed building's main entrance is described as being stepped ! In either case, carefully-designed ramped access is readily incorporated. Other details mentioned are to be expected in a new build and can be modified as required in the existing and any extension/adaptation. Internally the proposed new building of course offers step-free access and the existing building is capable of planning to provide the same. Disabled access is in any case a matter of interpretation and some degree of compromise in existing buildings, eg. Ground floor or lift-accessible. No analysis offered of possible re-planning of the existing whether or not considered as feasible. Why step-free access (with lift to basement + 2 doors) for cyclists parking ? Hopelessly inconvenient compared with free access at ground level or from a ramp – if the basement were permissible.

14. Planning Statement Submission.

This statement relies on 'detailed analysis' supposedly executed in the D&A Statement, whereas the latter contains only cursory references to matters of area character and rules compliance.

1.3 – existing building is old, not 'out-worn'. More denigration.

1.4 – a carefully-designed scheme would start with retention of the existing, adaptation and extension, not the over-sized oddity that is presented.

2.4 – "...forecourt..could accommodate 7 cars." There is no case for a basement garage.

2.5 – Acknowledged variation in scale and form should lead to a better study of this houses's potential.

Pre-app and onward.

Much of this resembles a design statement, but answering Camdens' queries, again detailed analysis not attempted.

The main aim of pre-app discussion is retention of the existing building, against which an applicant might try possible compensatory designs without guarantee of acceptance.

3.5 – suggests the original proposal, as well as being in excess of that now submitted, was only halfway between modern and traditional design, not overcoming retention imperative.. Proposed basement level does exceed the original LGF depth contrary to advice. Bike access to be step free – IF located at LGF, not that it has to be so located.

3.6 – if officers suggested reproduction of A&C ,HCAAC would prefer retention of the existing or a well-designed building of our time.

3.7 – the existing bank of front planting must be retained, it is not a new proposal.

3.8 – the rear extensions remain excessive due to wasteful planning described above, pressing into the rising ground at the rear.

3.9 – we query the choice of outlook and sunlight allocation to day/night ooms.

3.10 - bikes – see above. Either people need bikes around and in/out of Hampstead or they don't. Plan properly.

3.11 – 'much-needed housing', sustainability – see above.

4.2 – 4.5 – bringing existing older buildings into productive use is also pro-active and productive, managed in very many places.

4.5 – this scheme has nothing to do with national nor even local essential housing targets;.

4.12 – this scheme does not provide exceptional circumstances justifying demolition.

4.14 – the NPPF is not a waiver to local plans or CA statements, area character considerations, etc.

4.15 – are there any NPPF provisions described ?

4.16 – no public benefits are shown in this scheme, only private investment adding to obstacles to availability of housing for average individuals and families.

4.17-4.18 – HCAAC has defined the harm to the CA in the current proposals. Precedent is a consideration.

4.19 – No detailed assessment of the new proposal is put forward. This would require considerable work to compare favourably with current comments on the existing building's renovation and any examination of potential preparation for continued use.

4.21 – in error. Elevations reproducing A&C features and windows amounts and spacings tend to emphasise the elevational bulk and scale of the new proposal, the whole building bulk out-of-keeping with the area and immediately adjacent buildings.

4.22 – as above, copying 100-year-old styles as mere frontage and denying the existing building's individuality acknowledged as the CA character. 4.23 is opinion, which HCAAC challenges as above.

Developments using 'features' as sops to over-development are unacceptable.

4.24 – this quote applies to any building or extension, it does not override a requirement to avoid demolition of an asset. The current proposal is of a low architectural standard.

4.25 - does not give a licence to copy past styles.

4.26-4.28 – the D&A analysis is cursory and not related in detail to surrounding buildings whose diversity in any case is acknowledged above, not giving rise to applicable rules.

4.29 – the bulk unrelated to adjacent buildings is demonstrated here, and that before assessment of the building's depth, a proposed block of flats among houses.

4.30-4.31 – more promotion of the idea of neighbourhood compliance by copying past styles and features. Such replication is harmful to the character and history of the CA and threatens unacceptable precedent.

4.32 – the threat here is interference with the existing front planting due to the basement access, and with the rear woodland and wildlife chain by new surfacing and planting to challenge that resource. Assurance of bio-diversity protection is required.

4.33 – HCAAC opposes the proposal as causing harm to the area and creating precedent. Reproducing past styles in a current and different building type while destroying part of the area's heritage does not enhance the area.

Land use – HCAAC agrees the site could take a small block of flats based on retention and intelligent adaptation of the existing heritage asset, not in the way proposed. The Hampstead area is not capable of contributing more than partially to Camden's borough-wide housing targets. CA's cannot be a target for attempted over-development.

4.63 – we question the allocation of day rooms away from maximum sunlight periods and of bedrooms to the warmest and sunniest side of the building.

We comment on the planning and allocation of rooms, mostly or used to justify over-development of the envelope.

Basement – HCAAC challenges the need for a basement. Para 2.4 of this submission confirms the front forecourt could take 7 cars. The basement is an additional and unnecessary boost to the proposed over-development of this site.

Car access - We now learn (para 4.74) the proposal for a front area car lift, strangely not mentioned in the DAS nor annotated on any plans. This additional intrusion to the front forecourt is also meant for transit of bikes ? Otherwise bikes are taken through the front entrance to the lift, etc. etc. This does not seem to support ease of use of bicycles and questions the commitment or assessment of likely demand.

Energy and Sustainability. – we have commented in general on the submitted sustainability report. most of the available resources not being applied to this scheme.

Para 4.80 again dismisses the existing building as devoid of any recommended measures, absent any attempt in the DAS or any design assessment of potential for adaptation.

Planning conclusion - we have commented above on all items here.

15. Conclusion

- A. Hampstead CAAC opposes the proposed demolition of this fine house but would support a comprehensive refurbishment and careful extension of it.
- B. The property's character long history and associations contribute greatly to the cultural history of the CA, a major factor in appreciation of the area.
- C. Quality of the proposed design is not high nor does it enhance the CA. No clear concept other than uniform windows spacing to which internal planning must conform, the opposite of good planning and quality architectural design. Added to this is a pick-&-mix selection of Arts & Crafts features as wallpaper to the block.
- D. Removal of a valuable building exemplar of its time is not compensated by a pastiche copy which dilutes the area's heritage. The valued designs and forms of a century and more ago are not bargaining chips to cover over-development.
- E. Applicants' claims of conformity in height and massing are not true and there is risk of exceeding the ridge height claimed which is already 'slightly higher' than existing.
- F. Proper informed refurbishment of the front and rear elevations would reveal valuable characteristics and features which would confirm the building's positive contribution to the area and group.
- G. There is great scope for enhancing the standards and performance of the building which have yet to be explored by a proposing developer, ignored by the applicant.
- H. The minimal transport notes offered by the applicant are confusing; car parking and bicycle storage should be more carefully studied as well as truly assessing local transport benefits to the likely occupants.
- I. The access statement is not thought through as to local topography and general transport availability nor for the proven and published needs of persons of all capacities. The applicant's erroneous denigration of the existing building in this respect is not justified by gains claimed for a new building regardless of the area.
- J. Existing trees immediately adjacent to the building are at risk and any attempt to sanitise the woodland garden area with a 'landscaping scheme' must be resisted. The Bio-diversity of the gardens must be protected. Retention of the front trees and landscaping is essential.
- K. We have not studied the apparently over-complicated BIA and must ask for closest restriction on building to the boundary if essential in a properly-designed new scheme without risking neighbours' buildings and landscaping.
- L. We are not impressed by the weight of written material in applicant's reports which are inflated and repetitive, mainly directed at insistent denigration of the existing.
- M. We recommend refusal of this scheme and call for any development to be sought from a quality team, particularly any proposed architect. We seek a robust and open conduct of any pre-application process for a new scheme to ensure retention of and care for the existing building and its full potential. Paper copies of drawings for any new proposal should be requested from the applicant for HCAAC review as part of any pre-app discussion and required amendment.