

Lawn House
12, Hampstead Square
London NW3 1AB
12th December , 2016

Attention: David Fowler
Planning Officer
London Borough of Camden
2nd Floor, 5 St Pancras Sq
London WC1H 9JE

Dear Mr Fowler,

Planning Application Number 2016/6205/P

I am writing to object in the strongest possible terms to the above application to remove the at the buttresses and light well and replace them with modern structures.

Specifically my objections are ;

- The buttresses are grade II listed and perform an important structural role supporting both the wall and Lawn House.
- From an engineering perspective, the proposed replacement structures are not fit for purpose particularly given the expected ground movements arising from the deep basement excavation planned at 29 New End. This proposal is likely to increase the damage already forecast to both the wall and Lawn House. Please see the attached letter from Alan Baxter Associates dated 30th November, 2016.
- The wall has many buttresses with a variety of shapes, sizes and dates which contribute to the character of this listed structure. To make them uniform concrete structures would be severely detrimental to its individuality and appearance. The wall is an important feature of Hampstead Square located in the heart of Hampstead Conservation Area.
- The reason for the removal is to facilitate construction of a vast over sized 8,000 square foot basement. If the basement proposal is too large for the site then it should be amended in size rather than listed structures being removed. This proposal clearly offers no public benefit.
- During the planning appeal and in an extensive site visit conducted by the Inspector in the presence of Planning Officers from Camden, the location of the proposed piling was discussed at great length particularly with respect to its likely impact on T4 the Copper Beech (which carries a TPO). The conclusion, set out in drawings agreed at the Inquiry, was that the precise location of piling should be a

minimum of half a meter distance clear of the largest buttresses. To disregard these findings is not proper procedure. I enclose a letter from Landscape Planning highlighting the need to protect the root protection zone of the Copper Beech.

- The heritage statement from KM Heritage contains many inaccuracies which is surprising given that the history of both Lawn House and 29 New End is extremely well documented. KM Heritage refer to the two largest buttresses as being “modern dating from 1950s”. It is likely that the most recent buttresses would have been added at the time of the construction of the Nurses Home. 29 New End was designed by Edwin Wheeler in 1936/37, contractors (Troy & Co) were appointed in 1938 and it was completed in 1939. Lawn House was built in 1709 and the wall appears contemporary with the house. Contrary to KM Heritage’s claim, the wall has not been repositioned nor rebuilt over time. The bricks on the side of Lawn House are original in both the back and front. Lawn House remained largely unaltered for 150 years until a 4 storey extension was built on the back in 1866 and in 1938 a large steel critical window glazed extension was added and the side of the house facing the nurses home was rendered. This supports the suggestion that the most recent buttresses are mid to late 1930s and that the buttresses are material to the history of Lawn House.

I attach a photograph to illustrate the scale and character of the buttresses together with a letter from both Landscape Planning regarding tree protection and Alan Baxter Associates expressing concern as to why the replacement structures “will not work satisfactorily” structurally.

Yours sincerely

Jane Henderson

Sincerely yours,



09 December 2016

**Our Ref: 53375/Henderson
Council Refs: 2016/6205/P & 2016/ 4505/L**

Jane Henderson
Lawn House
12 Hampstead Square
London
NW3 1AB

Dear Ms Henderson

**Removal of two buttresses on boundary wall between 29 New End and Lawn House and their replacement with new buttresses;
associated re rendering of boundary wall, temporary removal of light well and its like for like reinstatement following construction works.**

Location: New End Nurses Home, 29 New End, London, NW3 1JD

Summary:

I refer to my recent instructions and confirm I have carried out a desk based audit of all documents and plans available on the Council's web site under 2016/6205/P and 2016/4505/L.

I object to the proposal as submitted by the current applicant who I understand is not the original applicant.

As you will recall I was appointed as the Rule 6 (6) Parties Expert Arboriculturist for the Public Inquiry held 2-5 and 9-11 December 2014.

I listened to much of the evidence during the first week of the Inquiry and was one of the party who accompanied the Inquiry Inspector to site for the inspection visit made on 5 December 2014.

A very great deal of time was spent during the Inquiry evaluating the impacts of the development proposal in the widest sense first under cross examination and then by means of the site inspection. .

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New End Nurses Home, 29 New End, London, NW3 1JD

Discussion

To quote from Alan Baxter Associates 17 August 2016 " *the buttresses are an integral part of the boundary wall and therefore we believe they are part of the listed structure*" I have to defer to ABA because I am not an Engineer when he says that the buttresses are an integral element of the boundary wall.

ABA lists a number of concerns pointing to [as indeed other objectors have done] that obtaining approval to remove the buttresses would allow for the possibility that the approved basement dimensions may increase in size. Which would effectively nullify all the various amendments pursued to date to lessen the impact of the basement excavation in relation to your property; its foundations; the boundary wall and thereby the Copper Beech.

I note that Savills in their letter to the Council 10 November 2016 state : " *The removal of these larger buttresses and their re instatement with smaller buttresses facilitates the construction of the approved development allowing for more working space*". However this would be contrary to the plans before the Inspector at the Inquiry; what the Inquiry Inspector said and the measurements he checked on site in 2014.

I saw on site that he wanted to ensure that the basement excavation commenced site side at a distance from the boundary wall which respected the root protection area of the Beech and exceed the width dimensions of the buttresses.

He did not refer to the need to remove these buttresses: so why is it now in 2016 that the Council is being asked to consider so significant an amendment that these inconveniently larger buttresses should be removed. It is not the case that the buttress removal " *facilitates the construction of the approved development*" If that were the case the Inspector would have made an appropriate comment in relation to the need to remove the buttresses during the Inquiry.

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Furthermore and contrary to the somewhat sanguine advice given by the applicants Expert Arborist the root protection area or rpa as set out under the Terms and Definitions of BS 5837 2012 is defined as the:

" layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree's viability and where the protection of the roots and soil structure is treated as a priority"

So mindful of the extensive Public Inquiry history in my view there is no justification to apply anything other than great caution when considering the need for apparently no more than a minimalist approach to the root protection area of the Copper Beech.

This submission should be refused: if there is now seen to be insufficient room to pile the basement excavation then reduce the basement footprint.

The buttresses should be left in situ thereby eliminating any resulting pressure on the boundary wall and on the Copper Beech arising from their removal.

Yours sincerely

**Margaret MacQueen BSc CBiol MRSB MICFor CEnv MAE
Principal Consultant Arboriculturist
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OCA UK Limited on behalf of Landscape Planning Ltd.**

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SCANNED LETTER BY EMAIL

Alan Baxter
INTEGRATED DESIGN

Our Ref: 1675/63/JGa/mw

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30 November 2016

Dear Jane

29 New End

As requested, I have reviewed the latest proposals from Fluid Structures in relation to the replacement buttresses. Fluid have supplemented their report by incorporating some historical drawings and details of when the buttresses were built - they conclude that they were built at the same time as the nursing home.

There does not appear to be any assessment of the condition of the wall or whether or not it is leaning. They conclude that the buttresses are unlikely to provide any significant restraint to the Lawn House, but there is no justification for this. The replacement piers are to be designed to resist nominal lateral loads from the wall, but not Lawn House.

Fluid note that differential movements between the boundary wall and the mini-piled foundations due to the basement excavation will be very limited. However we are not convinced of this, as they are supported at very different levels.

The structural proposals are exactly the same as before and therefore our comments are the same, namely:

1. The connection of the cantilever to the ground beam is not sufficient to mobilise the full stiffness of the cantilever. It should be fully connected but is shown to be connected over only half of its depth.
2. The arrangement of the ground beams relies on torsion for the buttress to work, which further reduces the stiffness of the buttress structure.
3. The piled foundations mean that the buttresses will not respond to ground movements in the same way as the wall they are buttressing. In a situation where no significant movements are expected, this might be acceptable but here, the new basement excavations will cause ground movements as has already been demonstrated. The differential movement is very likely to cause problems where the new buttresses and the boundary wall/flank wall of Lawn House meet. As proposed the arrangement will not work satisfactorily when considering differential movements.

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ABA STRUCTURAL & CIVIL ENGINEERING URBAN DESIGN MASTERPLANNING TRANSPORT & MOVEMENT CONSERVATION SUSTAINABILITY

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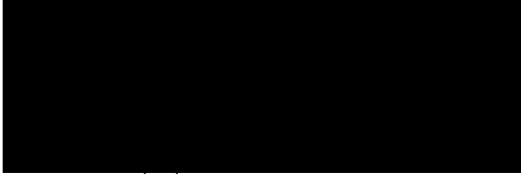
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Please let me know if you wish to discuss this.



Jim Gardiner
for Alan Baxter Ltd