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Our ref: 99 08 01

Dear Laura Hazelton,

2018/3816/L Boncara 35 Templewood Avenue London NW3 7UY

The Twentieth Century Society has been notified of the above application. The application seeks the demolition and relocation of the Grade II listed Schreiber House swimming pool. The Society wishes to **object** to the above application, and our views are set out in the comments below.

At the end of 2017 we provided pre-application comments to the architects WYG, where we encouraged the applicant to consult a conservation specialist, and to explore all options for repairing the structure without demolition.

As we previously stated, the Society considers the division of the Schreiber House plot and subsequent development of the site at 35 Templewood Avenue to have greatly damaged the historic and architectural significance of the pool structure. The relationship to James Gowan's Schreiber House has almost been entirely lost. This new phase of development offers the opportunity to improve the setting of the pool, and address issues concerning its maintenance and repair.

The Society wishes to reiterate that the relocation of the pool must be treated as demolition. The criteria justifying the demolition of a listed building is stated in paragraph 195 of the NPPF:

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

As stated by Historic England in their pre-application advice, this decision must consider whether public benefit can only be brought about by demolition of the heritage asset. We agree with Historic England that the reinstatement of landscaping and the principle of bringing the pool back into use would be positive alterations.

Our pre-application recommendation for the advice of a conservation specialist has been met with the consultation of a structural engineer. Despite this, we remain unconvinced that sufficient investigation has been carried out to ascertain the cause of the leak to the pool, and we are not confident that the deconstruction and relocation can be carried out without damage to the original fabric. The engineer's view that alterations amounting to demolition are required to assess whether the pool can be brought back into use does not constitute public benefit. In order to support the application, we require definite reassurance that proper safeguards will be put in place to protect the original fabric in dismantling and storing, and to guarantee that the reconstruction of the pool be carried out without damage or harmful alteration to the original design. The current application does not provide this reassurance, and we are therefore unable to support it.

The Society regrets the prior damage to the significance of the Schreiber House pool, and we support the principle of bringing the pool back into use and improving its setting. The current application does not provide adequate reassurance that relocation is absolutely necessary, and we recommend further evidence be submitted to set out a detailed strategy for dismantling, storing and rebuilding the pool if relocation is to be pursued.

I trust that these comments are of use to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,



Grace Etherington
Caseworker
Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.