



75 Lawn Road, London, NW3 2XB  
Application Ref. (2018/2136/P)

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## RESPONSE TO CONSULTEE COMMENTS

September 2018

This Statement has been produced in response to comments received during the consultation period for the above application, to aid the Council in its consideration of the application.

This document seeks to address the objections which are of material relevance to this application and are separated into the following headings:

1. Statements regarding the existing property's condition
2. Demolition extent and sustainability of the development
3. Loss of off-street parking
4. Scale of basement development
5. Impact of Basement upon the conservation area
6. Impact of the front/side extensions upon the character of the conservation area
7. Impact of the front/side extensions upon the amenity of no.76 Lawn Road
8. Clarification on scale of rear extension (including eaves line and parapet heights)
9. Basement Impact Assessment, Construction Management Plan and Party Wall Awards
10. Conclusion

## 1. Statements regarding the existing property's condition

### Consultee comments:

Neighbours and a relative of the previous owner of No.75 Lawn Road, have commented that the 'application gives a misleading impression of the condition of the house', and that 'It has only been since the house has been sold and left unoccupied by the purchasers that its internal condition may have deteriorated.'

### Response:

1.1. Prior to the purchase of the property, a building survey report was prepared by Malcolm Hollis LLP which concluded that the property was in a tired state of repair and required substantial amounts of remedial work to the building fabric and services. All statements within Nash Baker's Design and Access Statement can be substantiated by this independent assessment of the property and have been corroborated by our own investigations.

1.2. Malcolm Hollis LLP's report noted the following key issues:

#### Damp and Mould

- An isolated area of raised moisture to the base of the front flank render wall 'was identified, which is thought to have occurred where the DPC is missing or has failed';
- The base of both chimneys on the ground floor had raised moisture readings when tested with an [SIC] electrical moisture meter, as did the party wall adjacent to the rear elevation and the garage wall was visibly damp where the gutter is leaking';
- There is mould staining to the internal timber frame 'of some windows, 'which has occurred as a result of condensation;
- 'rainwater goods are generally in poor order' and 'there is a leaking section of gutter above the garage which is causing penetrating damp to the garage wall and damage to the render finish';
- The render finish to the rear elevation and garage has been extended to finish flush with external ground level. This is a poor detail and can lead to issues with rising damp';
- The painted finish to the windows is starting to deteriorate with flaking paint exposing the timber grain and allowing isolated areas of rot;
- 'Originally the external walls would have been constructed with a lime-based mortar', 'but have been repointed with a cement based system which is not appropriate for a property of this age and type', and 'can lead to moisture being trapped within the brickwork and damage to the brickwork.'

#### Other issues of note

- Single glazed timber frame doors to the rear elevation and garage are in poor order with areas of rot to the base of doors, deterioration to the painted finish, cracked glazing panes to the rear reception room and garage doors, deflection to head of the kitchen and rear reception room doors indicating that the lintels are inadequate and no evidence that glazing is toughened;

- a 'number of slipped, damaged and missing plain tiles to the pitched roof and the built-up mineral felt coverings to sections of flat roof are approaching the end of their anticipated life';
- 'deflection to the roof coverings and the purlins within the loft space, indicating that the timber size is not adequate for the load and span';
- outdated electrical services installations to the property which require upgrading to meet current requirements.

## 2. Extent of demolition and sustainability of the development

### Consultee comments:

#### Proposed Demolition

The Conservation Area Advisory Committee (CAAC) have objected to the development, stating this is: *'a hugely over-developed scheme, which depends on undeclared demolition of large parts of the original 19<sup>th</sup> century house. It clearly contravenes Camden's guidance in the Local Plan 2017, Policy D2 Heritage, page 235; and also the earlier document of 2011, Parkhill & Upper Park Road Conservation Area Appraisal.'*

#### Sustainability

Neighbours have commented that the proposed demolition: *'Conflicts with a range of environmental policies, such as GLA Sustainable Design and Construction SPG 2014 and Camden Planning Guidance CPG 3 – Sustainability' and GLA Sustainable Design and Construction SPG 2014: Section 2.7.8: Design Stage, Managing existing resources.'*

### Response:

#### Proposed Demolition

2.1. Policy D2 (f) of the Camden Local Plan states that:

*"the Council will resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area";*  
 paragraph 7.49 states that: *"The Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention."*

2.2. The parts of the building proposed to be demolished - namely, the garage, the existing rear extension and the roof - are of poor-quality construction and make only a neutral contribution to the conservation area. The front façade and flank wall which make a positive contribution to the conservation area will be retained.

- 2.3. When complete, the building will substantially retain its existing appearance but will have been improved by appropriate repairs and enhanced with new elements constructed from the highest quality materials to match existing where appropriate.
- 2.4. The proposed improvements in construction and design will enable the building to comply with current building regulations standards.
- 2.5. The CAAC has stated that the scheme '*depends on undeclared demolition*'. The extent of the demolition has been declared and clearly communicated on the existing plans submitted as part of the application (Nash Baker Architects drawings: 1722\_2\_101, 102, 103,104). This comment should therefore be disregarded.

### Sustainability

- 2.6. CPG3 section 8.4 states that:

*"Most development sites have existing materials which can be re-used, recycled or obtained from nearby development sites. You should always look for options to sensitively re-use, refurbish, repair and convert buildings, rather than wholesale demolition. This will reduce the amount of resources used and will help reduce construction waste"*

- 2.7. The proposal involves the refurbishment of the existing building and does not represent "wholesale demolition". The parts of the building which are proposed to be demolished are of poor-quality construction and unsuitable for repair or restoration. This includes the roof structure, single brick garage structures, and parts of the building which has been rendered in cement-based pebble-dash. The principle elevations which are of architectural merit and provide a positive contribution to the area will be retained.
- 2.8. All building materials have a lifespan and a building which is almost 100 years old requires regular renewals and repairs. For example, a clay tiled roof has a typical lifespan of 50-60 years, with the felts and membranes lasting typically 40 years. This property appears to have had very little in the way of repairs and renewals since its construction, and as such much of the building fabric is currently unsuitable for re-use. However, where materials which are not re-used will be recycled in accordance with good building practice and the Considerate Contractor Scheme.
- 2.9. Elements of new construction will be of higher quality, meeting the rigorous modern standards of thermal performance to ensure a reduced future carbon footprint. The works will also improve the living standards of the occupants, reduce maintenance and ensure the building's ongoing occupation.

### 3. Loss of off-street parking

#### Comments:

One objection was raised that the development will have the effect of: '*reducing the amount of off-street parking.*'

#### Response:

- 3.1. The existing property can accommodate 3 estate sized cars on the driveway and 1 car within the garage. The proposed front and side extension will reduce this capacity but still allow 2 family sized estate cars to park on the driveway. This is entirely adequate for a single-family dwelling and is the same external off-street capacity as other dwellings along the street.
- 3.2. Camden's policies seek a reduction in parking through development schemes and as a result the proposal accords with the Council's policies relating to off-street parking.

### 4. Scale of Basement development

#### Consultee comments:

##### Scale of Basement Development

The CAAC have objected to the 'hugely over-developed scheme', whilst the Belsize Residents Association have commented that it is an 'overdevelopment of the site' and 'near doubling of the existing property'.

#### Response:

- 4.1. FOOTPRINT - The increase in property size has been significantly overstated. The proposed percentage increase in the overall footprint (GEA) of the property is approximately 26.3%
- 4.2. BASEMENT GIA - The area of the proposed basement at No.75 Lawn road is 124m<sup>2</sup> (GIA). This is substantially smaller than the recently approved basement development at No. 77 Lawn Road (2016/1737/P) which has an area of 183m<sup>2</sup> (GIA) - based upon application drawings. The size of the proposed basement development is therefore in keeping with established precedents along the street.

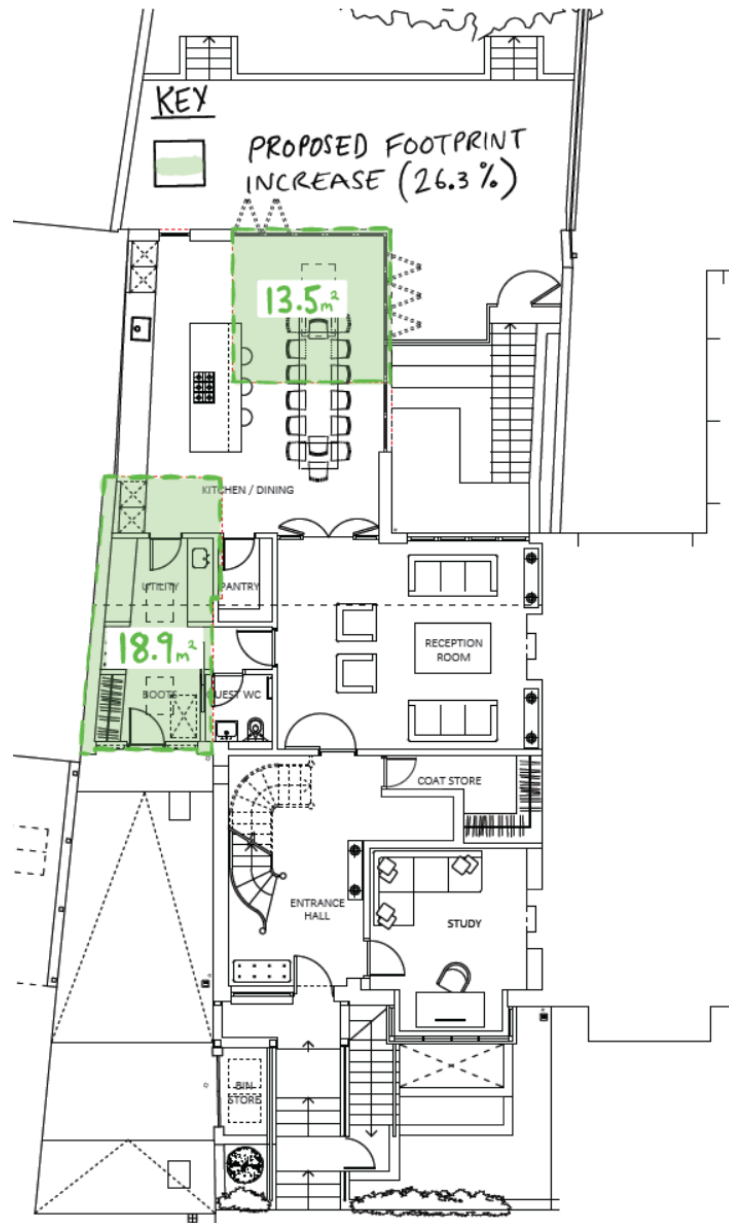
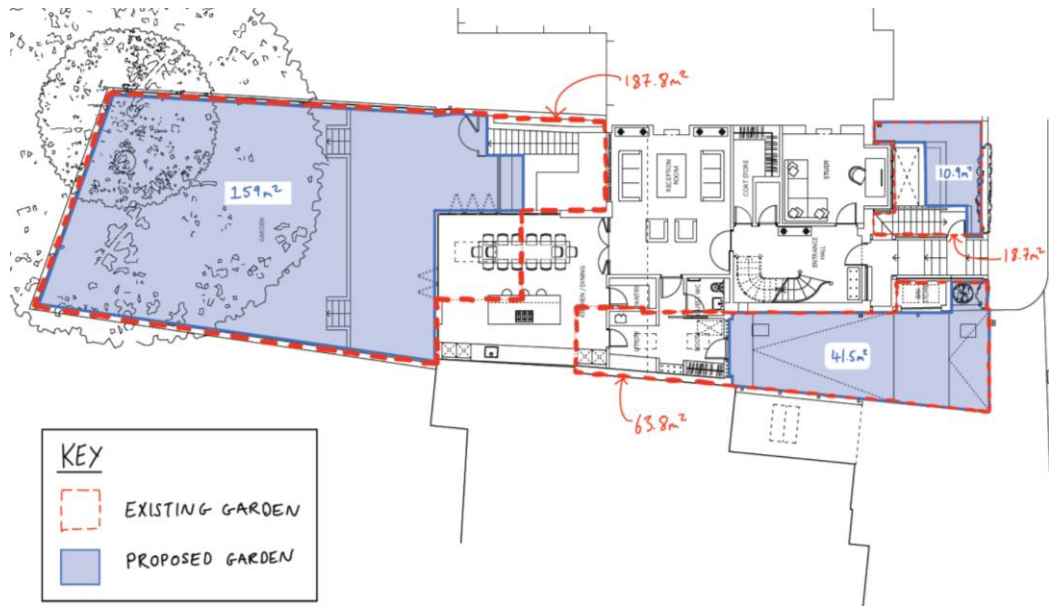


Diagram showing increase in footprint by proposed development

4.3. REDUCTION IN GARDEN AREA - In accordance with Camden's 'Policy A5, criterion h', the proposed basement and lightwells will not exceed 50% of either the front or the rear gardens. The existing front garden area is 82.5m<sup>2</sup> and the lightwell will occupy 10.1 m<sup>2</sup> which is 12.3% of the front garden. The existing rear garden area is 187.8m<sup>2</sup>, and the proposed 'unaffected' garden area to the rear will be 159m<sup>2</sup>, the basement development will therefore only encroach 15% into the existing rear garden.



Plan showing existing and proposed garden areas at No. 75 Lawn Road

## 5. Impact of basement upon the conservation area

### Consultee comments:

#### Front and Rear lightwell: size, visibility and margins

The Belsize Residents Association and neighbouring property owners have objected to:

- the size of the front and rear lightwells, stating they will 'disturb both the front and rear gardens';
- the visibility of the front lightwell and access steps to the street, stating that it will be 'clearly visible, from the street';
- the proposed 'set back' distance between the rear lightwell and boundary wall of No.74/75.

### Response:

5.1. The rear lightwell will not be visible from neighbouring gardens. The rearmost part of the rear lightwell will only be visible from the adjacent first floor bedroom window at No.74, but will be mostly obscured by the boundary wall between the properties.

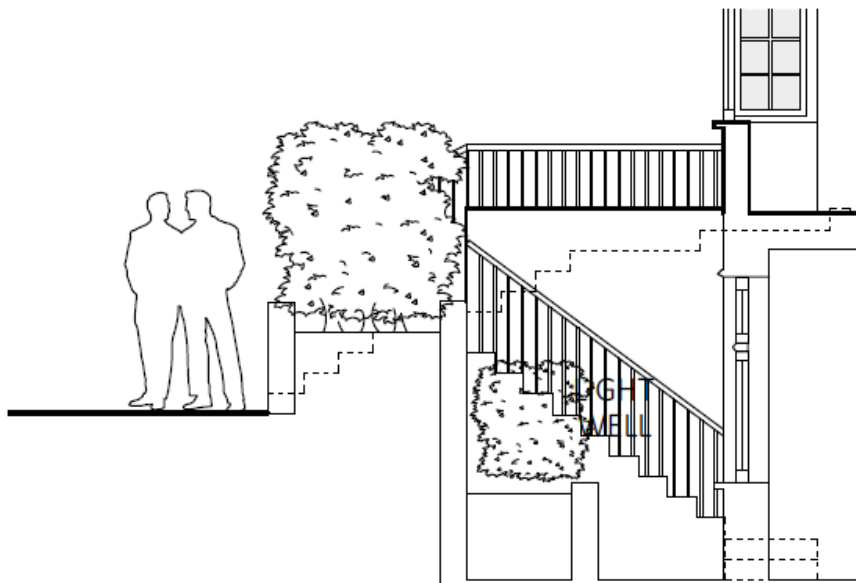
5.2. The area proposed for the rear lightwell is currently a service yard, or at best a secondary part of the garden. The principle garden views are towards the rear garden which will remain unaffected by the development.

5.3. The front lightwell and access stair will be well concealed behind soft landscaping, and sits at a higher level to both the pedestrian pathway and road. This element will therefore not impact

the street scene and the character of the Conservation Area since it is not visible from the public realm - as shown in the visualisation and section below.



*Computer generated image showing the front of the property as seen at eye level*



*Section showing screening of the front lightwell by vegetation and height of existing front wall*

- 5.4. For the above reasons there will be minimum external manifestations of the proposed basement, it will therefore preserve the character of the Conservation Area in accordance with planning policy.
- 5.5. Neither Criterion I) of Policy A5 or CPG Basements documents state a set amount for basements to be set in from site boundaries when they would extend outside of the footprint of the host buildings. However, Camden have clarified to NBA that the purpose of criterion I) is to protect the existing trees and vegetation of neighbouring properties close to the applicant's boundary.



- 5.6. No. 74 has shrubs and climbers growing near and against the brick boundary wall with No.75. The roots of these will be shallow and are unlikely go beneath a the wall footings. Furthermore, given the proximity to the house, this area would not be a sustainable location for future tree planting.
- 5.7. The proposed set back from the inner face of No.74's boundary wall and the basement retaining wall is approximately 500mm. This is a sensible margin for drainage and any root growth that might cross the boundary line. As such the proposal fulfils the aims of this part of the policy.

## 6. Impact of front/side extensions upon the character of the conservation area

### Comments:

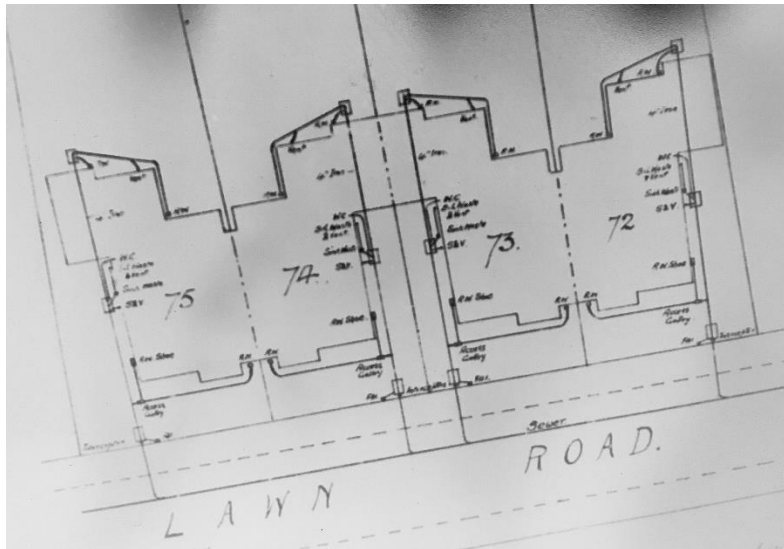
#### Design and size of front/side extensions

Neighbouring property owners and the Belsize Residents Association have objected to:

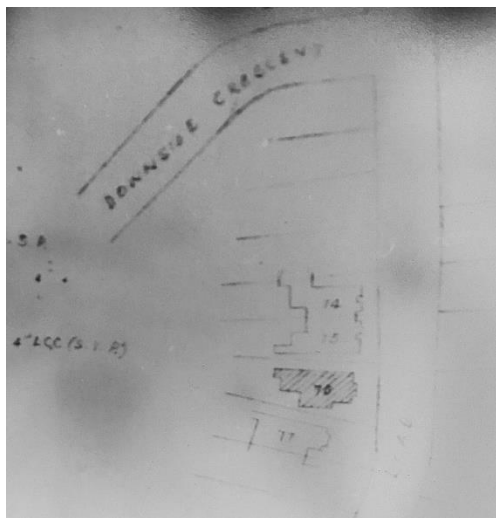
- the design on the basis that both the ground and first floor extension, including its *'mock-mansard roof'*, *'destroys the original design'* and would result in a loss of *'design symmetry'*, which would be *'out of character with this row of 1920s Arts & Crafts style symmetrically paired houses'*;
- one neighbour has objected to the *'unique front dormer'* at first floor as it will be the only dormer facing Lawn Road and set an *'unsuitable precedent'*;
- the size of the 2m front first floor extension, as this would set a precedent where the 1st floor side elements of two adjacent houses are not flush with each other (i.e. not in the same vertical plane.)

### Response:

- 6.1. 75 Lawn Road was originally conceived as one of four dwellings in two linked pairs (No's.72 & 73 and 74 & 75 Lawn Road), with No. 76 being a detached house.



Microfiche plans from Camden Archives – dated May 1925



Microfiche location plan for 76 Lawn Road from Camden Archives, showing no.76 as a detached dwelling – dated May 1925

- 6.2. It isn't entirely clear how it happened, but the design symmetry of these four houses diverged at some point in time, resulting in the current condition whereby No.75's existing two-storey garage block has a flat roof and sits further back from the road than the other garages within this grouping of terrace houses. This is in contrast to Nos. 72, 73 and 74 which have pitched tiled roofs. Consequently, the design symmetry of this group of properties has been eroded.
- 6.3. Number 75 and 76 weren't originally designed as a matching pair and therefore any symmetry between their two side elements is the result of later development.
- 6.4. The proposed development of No.75 Lawn Road seeks to enhance the legibility of this grouping of houses by reinstating a pitched roof design in traditional materials, thus improving the symmetry, balance and rhythm.

6.5. The reinstatement of a clay tiled pitched roof (not a mansard as described by the Belsize Residents Association), mirrors the characteristic roof form of the property grouping and will enhance the streetscape and broader conservation area.



*74 and 73 Lawn Road*

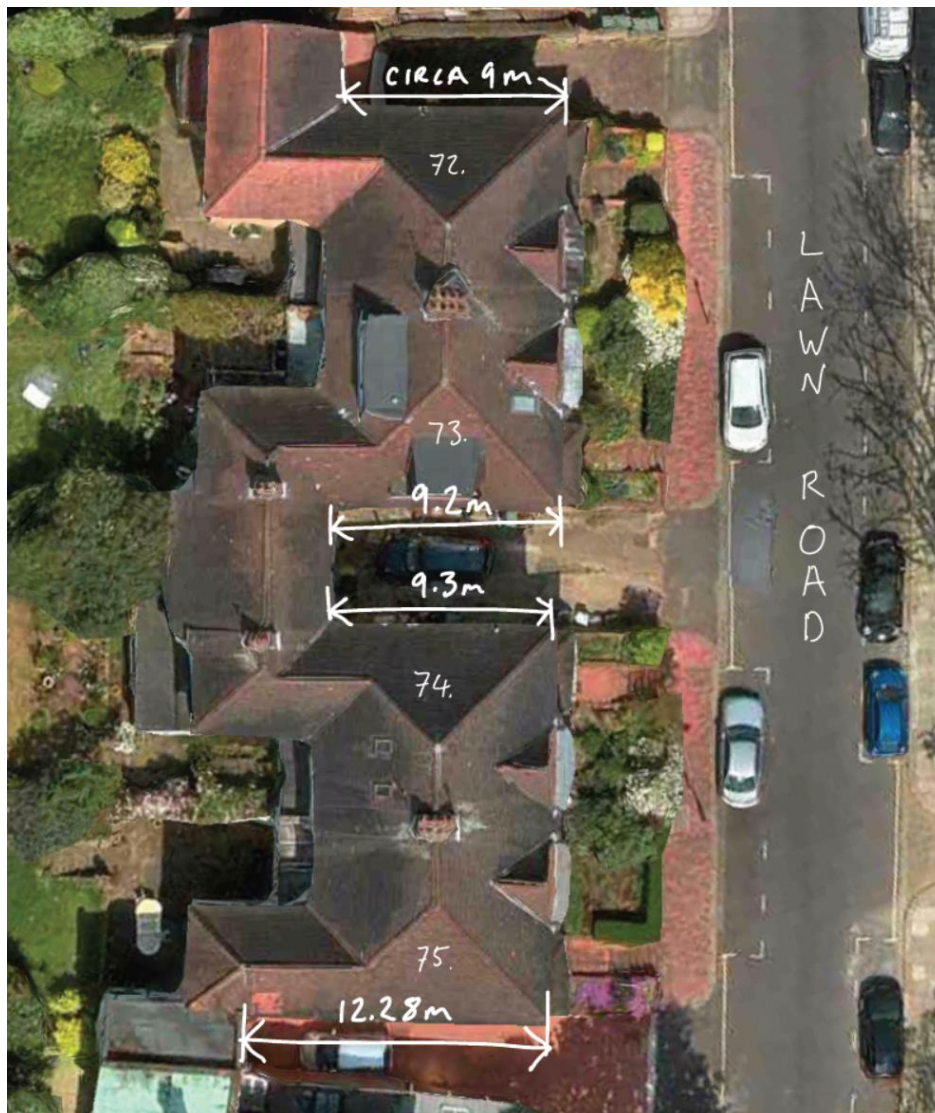
*72 Lawn Road*

6.6. An example of two distinct house types meeting with differing side elements can be seen at Nos. 80 and 81 Lawn Road.



*Photograph showing the two-storey side elements with differing roof types of Nos. 80 & 81 Lawn Road.*

- 6.7. The ground floor projection will incorporate garage-style doors to echo the garage doors of Nos.74, 73 & 72.
- 6.8. The forward projection of the ground floor will reflect the precedent set by Nos. 72 and 76 Lawn Road to provide a more congruent elevation along the west side of the street.
- 6.9. The existing two-storey garage blocks at Nos. 72, 73 & 74 are set back from their front elevations by between approximately 9m, 9.2m and 9.3m respectively (see below diagram).
- 6.10. The existing garage block at 75 Lawn Road is set back from the front elevation of the property by 12.28m. The proposed first floor extension is 2m forward of the existing garage, giving a set back of 10.28m. This modest extension will therefore enable No.75 to better reflect the prevailing relationship between side elements and front elevations of both its pair at No.74, and that of its adjacent linked pair at Nos.73 & 72 Lawn Road.



*Comparison between existing garage set back from the front elevation at 72-75 Lawn Road*

- 6.11. The precedent of ground and first floor side elements not being in the same vertical plane has been set by other properties along the street, most notably at the neighbouring property (No. 76) which has a garage and canopy which project forward of the first floor elevation. Even within this row of 1920's linked pairs (No's.72 - 75 Lawn Road) No.72's garage projects further forward at ground floor than first floor. It is therefore incorrect that the proposed development at No.75 would set a precedent in this regard.
- 6.12. The proposed side roof slope and dormer window which front the highway are on a secondary elevation which is setback more than 10m from the principle elevation. As such a dormer window will not detract from the principle elevation of the house.
- 6.13. Dormer windows are a common architectural feature on Lawn Road and can be seen all along the street and the wider Conservation Area at properties such as Nos. 16, 17, 18, 19, 20, 21, 26, 27, 83, 84 Lawn Road and No. 35 Downside Crescent.
- 6.14. It should be noted that Paragraph 4.2 of the officer's delegated report for the refused application (2017/6726/P), which also included the side extension towards the front of the property, supported these elements stating the following:

*'The front proposals involve the ground floor garage conversion and extension projecting out alongside the garage with No.76, but would be set back 200mm from No.76's garage and would have a similar flat roof. The first floor extension would be a modest extension which would incorporate a front dormer window within a new pitched roof with lower eaves almost giving the appearance of a cat slide roof.'*

The planning officer continues: *'Additionally, the front projections are set so far back from the front building line, the impact on the street scene would be minimal. It is therefore considered the design, scale and use of materials for these elements would be considered proportionate to the original dwelling and would not be out of keeping within the street scene.'*

## **7. Impact of the front/side extensions upon the amenity of No.76 Lawn Road**

### **Comments:**

The neighbours at Nos. 74 & 76 Lawn Road have objected to the proposed first floor front/side extension claiming it will be 'over-bearing and create a sense of enclosure', with the resident at No.76 adding that the new 2 metre projection 'will create a tunnel effect'.

### **Response:**

- 7.1. The impact upon No. 76's amenity will be considered under the following headings:
- a) Overbearing

- b) Outlook
- c) Sense of Enclosure

7.2. A review of relevant council policies that address these considerations finds the following:

7.2.1. **Overbearing:** The council has no specific policy on 'overbearing'. The word does not appear in policy A1 and is only used once in CPG 6 in the context of 'outlook', where it states:

*7.9 - When designing your development you should also ensure the proximity, size or cumulative effect of any structures do not have an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers.*

7.2.2. **Outlook:** CPG 6 describes outlook as follows:

*7.8 - Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. How pleasant an outlook is depends on what is being viewed. For example, an outlook onto amenity space is more pleasant than an outlook across a servicing yard. You should design developments so that the occupiers have a pleasant outlook. You should screen any unpleasant features with permanent landscaping.*

7.2.3. **Sense of Enclosure:** The council has no policy on 'Sense of Enclosure'. The phrase does not appear in policy A1 and is only used once in CPG 1 in the context of general principles for rear extensions, where it states:

*4.10 - Rear extensions should be designed to: not cause a loss of amenity to adjacent properties with regard to sunlight, daylight, outlook, overshadowing, light pollution/spillage, privacy/overlooking, and sense of enclosure;*

7.3. The proposed front sloped extension at first floor extends forwards by 2m. Forward of this modest extension, the flank walls of Nos.75 and 76 will remain as existing, which is between 5.38m and 5.91m apart and is a considerable distance when these passageways are arguably a service yard.

7.4. Whilst there is no right to a view in planning terms, the view from this existing front window above the garage of No.76 remains predominantly unchanged as the front extension only partially obscures the view of No. 75 Lawn Road's flank wall and first floor windows.

The best views from No.76's first floor front window (above the garage) aren't of No.75, instead they are across Lawn Road towards the foliage and Italianate style town houses opposite. This aspect will remain unaffected by the development.

Whilst the proposed side extension will be visible from No.76's first floor bedroom window, this impact is considered minimal as it will only obstruct views of the flank wall of No.75 Lawn Road (see below visualisation).



*Computer Generated Image of front first floor window above garage at No.76 Lawn Road with window frame shown translucently. This image shows that the extension will not 'create a tunnel effect'.*

- 7.5. Since the bedroom in question is dual-aspect, which is confirmed in the owner's objection letter dated 29.07.2018, the principle views from this room are arguably towards the rear garden from the rear window. This view will remain entirely unaffected by the proposed development at No.75.
- 7.6. The council has no standard test for assessing the impact of an extension on 'sense of enclosure' and 'outlook' or whether it is 'overbearing', but the officer's report for the refused application 2017/6726/P makes reference to a 45 degree visibility zone in relation to the first floor rear extension (an element that is not included within this application). This test presumably comes from the BRE publication 'Site Layout Planning for Daylight and Sunlight'. This provides a 'rule of thumb' method for assessing the impact of an extension on a neighbour's diffuse skylight levels. This publication warns: *'Like most rules of thumb [the 45 degree approach], this one needs to be interpreted flexibly'* and, a *'VSC calculation (see Sections 2.2.5 and 2.2.6) can be used to quantify the loss of light, if required.'*

Applying the 45 degree line rule of thumb to the first floor window above the garage of No.76 shows that the 45 degree splay does bisect the proposed front extension to No.75 Lawn Road. However, due to its sloped form, this area is almost entirely below eye level (1600mm) as viewed from the first floor level of no. 76 (see sketch below). It is therefore considered that there will be a negligible impact upon No.76's amenity in terms of sense of enclosure.

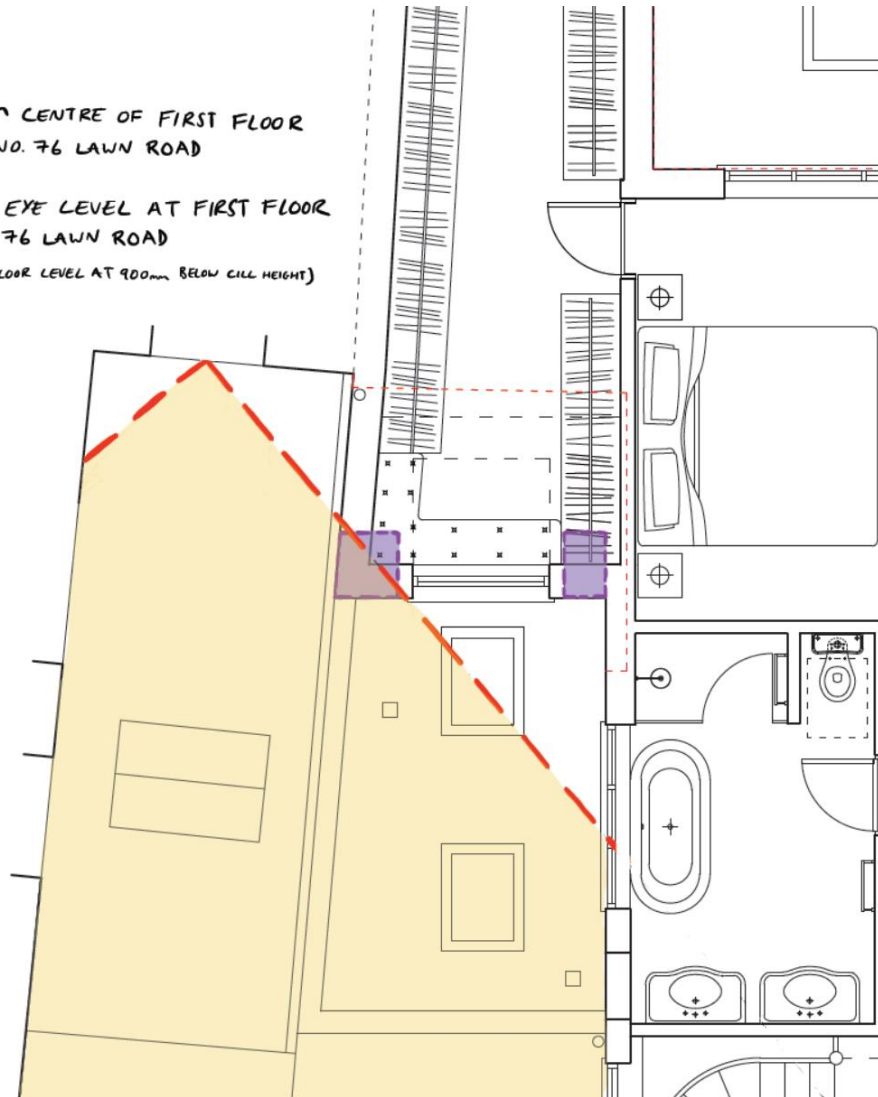
## KEY



45° LINE FROM CENTRE OF FIRST FLOOR WINDOW AT NO. 76 LAWN ROAD



AREA BELOW EYE LEVEL AT FIRST FLOOR LEVEL OF NO. 76 LAWN ROAD  
(NOTE: ASSUMED FLOOR LEVEL AT 900mm BELOW CILL HEIGHT)



Plan at first floor showing 45-degree visibility zone from first floor of no. 76 Lawn Road.

- 7.7. Specialist consultant Rights of Light Consulting undertook two daylight tests based upon BRE's guidance for the refused application (2017/6726/P), which included the same front extension as this application:

### Test 1 - Vertical Sky Component

The percentage of the sky visible from the centre of a window is known as the Vertical Sky Component. Diffuse daylight may be adversely affected if after a development the Vertical Sky Component is both less than 27% and less than 0.8 times its former value.

### Test 2 - Daylight Distribution

The BRE guide states that where room layouts are known, the impact on the daylighting distribution can be found by plotting the 'no sky line' in each of the main rooms. The no sky line is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.



The report by Rights of Light Consulting concluded that: *'All windows pass the Vertical Sky Component test and where applicable, all rooms pass the Daylight Distribution test. The proposed development therefore satisfies the BRE daylight requirements.'*

The modelling of daylight and sunlight by Rights of Light Consulting, as well as our own visualisations indicate that there will be negligible impact upon No. 76's outlook and sense of enclosure and that the proposed extension is not overbearing, especially given that the extension has a sloping form.

## 8. Clarification on scale of rear extension (including eaves line and parapet heights)

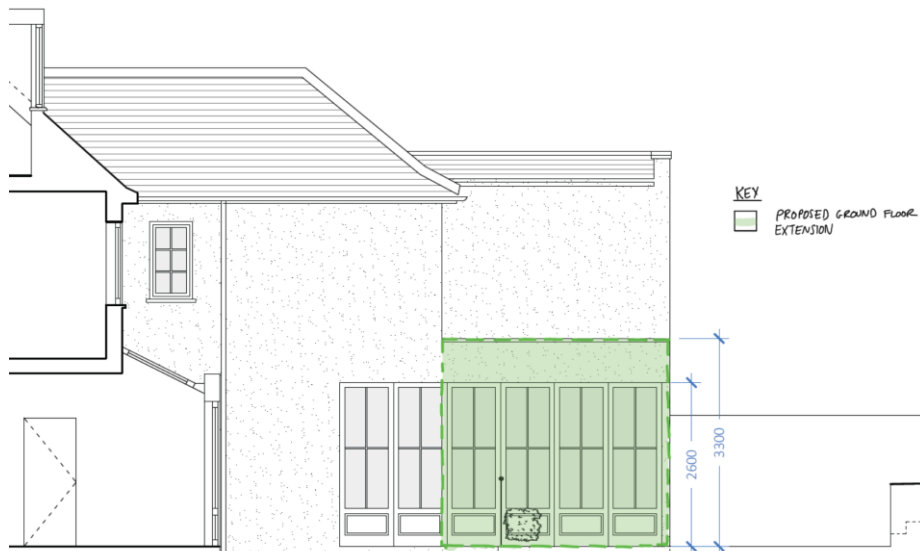
### Comments:

The following concerns have been raised in relation to the heights at the rear of the property:

- 'Object to the height of glazing in the new ground floor windows facing' No.74, 'if this is greater than the level of the top of the glass panes permitted at 79 Lawn Road i.e. approx. 2600mm.'
- The parapet height of the ground floor rear extension should be no greater than the height of the ground floor extension at No. 79 Lawn Road (2016/0313/P) as approved which is '3150mm'.
- Gutter level and parapet wall of rear first floor rebuilt garage block above dressing room should match the existing.

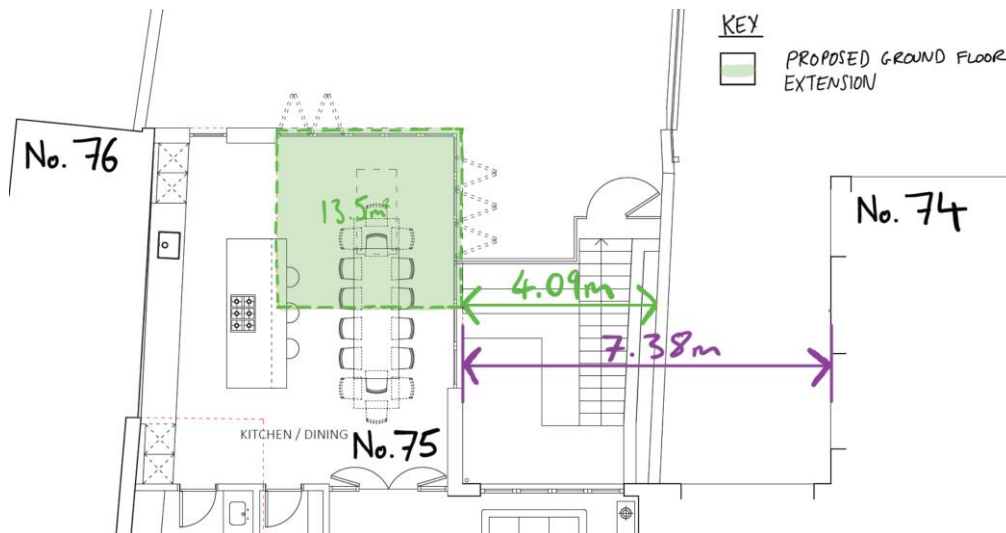
### Response:

- 8.1. The height of the proposed extension is a result of matching the internal ceiling heights of the existing house within the proposed extension. Added to this is the necessary structural and thermal build-up and the lowest possible parapet upstand. The height is therefore entirely in keeping the scale of the property.
- 8.2. The proposed height of the glazing to the rear and side ground floor rear extension is 2600mm. As such, the height of the glazing is no greater than the glazing to the 1-storey extension at No.79 Lawn Road and this objection should therefore be discounted.
- 8.3. The parapet for the ground floor rear extension is 3300mm. According to CPG1, 4.12 *'In order for new extensions to be subordinate to the original building, their heights should respect the existing pattern of rear extensions, where they exist', and 'In cases where a higher extension is appropriate, a smaller footprint will generally be preferable to compensate for any increase in visual mass and bulk.'* The proposed extension is not visible from the street and there is no consistent rhythm or pattern across the existing rear extensions.



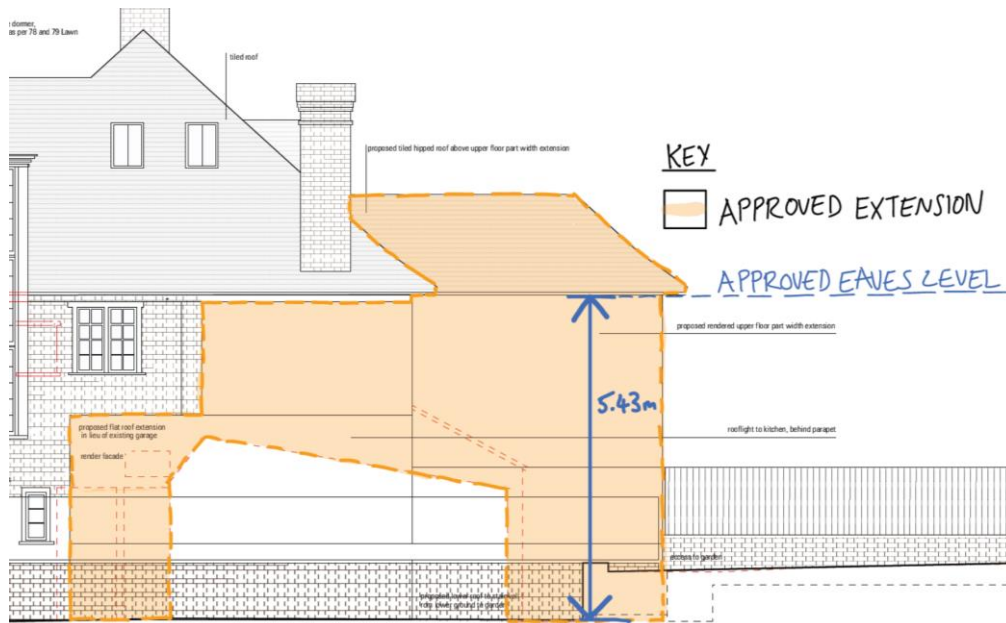
Extract of proposed rear ground floor extension to No.75 Lawn Road

- 8.4. The proposed ground floor infill extension has a modest footprint of 13.5m<sup>2</sup> and is set 4.09m away from the boundary wall between Nos.74 & 75. It is also 7.38m away from the parallel flank wall of No. 74 Lawn Road.

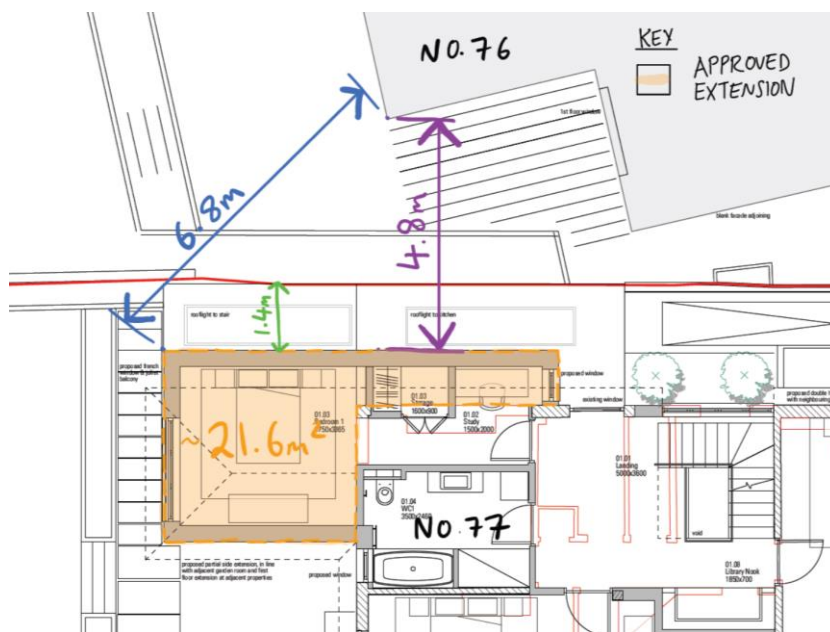


Extract showing extent of small increase proposed rear ground floor extension to No.75 Lawn Road.

- 8.5. By comparison, the recently approved rear extension at no.77 (2016/737/P) is a two-storey extension with a footprint at first floor of 21.6m<sup>2</sup> and an eaves level of 5.43m. It is only 1.4m from the boundary of 76 Lawn Road, and 4.8m from the built form of No.76 increasing to 6.8m as measured to the corner of the extension.



Extract of approved drawing for No.77 rear extension/side elevation (2016/737/P) with dimensions annotated by NBA (based upon approved drawings)

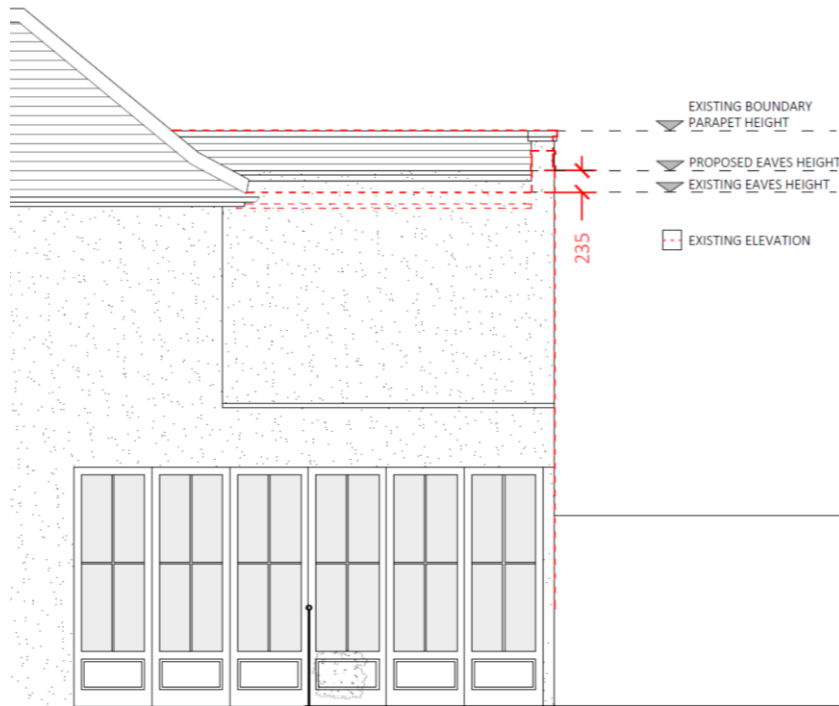


Extract of No.77 first floor plan as approved (2016/737/P) with NBA annotated dimensions based upon approved drawings

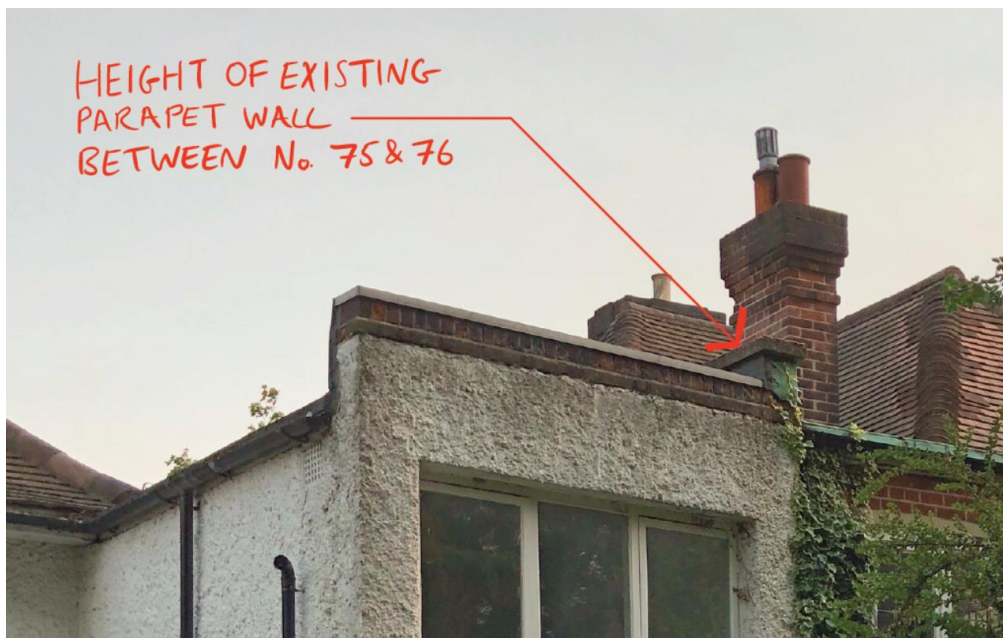
8.6. The proposed ground floor rear extension at No.75 is 140mm higher than the eaves line of No.79's approved rear extension (2016/0313/P), which is 3.16m high, however the proposed extension is lower than No.79's rooflight, the top of which is situated at 3.4m above ground level as measured from the approved revised rear elevation drawings.

8.7. To allow the scheme to have consistent ceiling heights and comply with modern structural and thermal requirements the scheme proposes to raise the rearmost first floor flank wall by 235mm.

8.8. This proposed increase is still below the height of the existing boundary parapet wall, and given that the flank wall of this two-storey element will remain over 11.1m away from the rear flank wall of No.74 Lawn Road, we consider that this minor change in height will be imperceptible from neighbouring properties and any objection in relation to its height should be disregarded.



*Extract of rear side elevation showing minor increase in rearmost flank wall*



*Photograph of parapet wall between Nos.75 & 76 Lawn Road as seen from ground level*

## 9. Basement Impact Assessment, Construction Management Plan and Party Wall Awards

9.1. Objections and comments raised in regards to the Basement Impact Assessment, Ground Movement Assessment, Structural Engineer's Design Assessment and Construction Management Plan are listed below. However, they fall outside the scope of this document as they will be addressed via the Party Wall Act, a Section 106 agreement and Camden's BIA auditing process which will be undertaken between checking engineers Campbell Reith and the applicant's engineers.

### 9.2. Objections and comments on the Basement Impact Assessment including Ground Movement Assessment

- The 'special conditions' such as existing subsidence at No.76 have not been taken into consideration;
- Programme and works to No. 77's basement works not taken into consideration;
- Concerns regarding the accuracy of the Fairhurst ground movement assessment as it relies on 'limited data', incorrect wall lengths of No.74 based upon incorrect OS data which doesn't reflect rear building line with 'a fair amount of uncertainty built into the model of predicted damage';
- The structural damage assessment doesn't consider all of No.74's walls and only considers adjacent walls;
- The cumulative impact on hydrology (water movement) and ground movement of nearby basement developments is not considered in BIA. Refer to Policy A5, Page 214, & 217.

### 9.3. Objections and comments on the structural engineer's design assessment

- The document refers to '*outdated policy*' regarding Burland Scale minimum target of 2. Camden Local Plan (July 2017), Policy A5, Basements and CPG: Basements don't allow higher than Burland Scale 1.
- Lack of information provided for temporary propping of party wall between Nos.75 & 74'
- Existing '100mm' thick brick rear garden boundary wall between Nos.75 and 74 cannot withstand vibrations, piling and earth movements from a major basement construction, immediately adjacent.

### 9.4. Construction Management Plan

- Lack of '*meaningful consultation with neighbours*' for CMP as initial consultation period was 7 days long;
- Neighbours comments not included in first draft;
- Document doesn't include cumulative effects of basement developments at No. 77 nearby or recently approved (April 2018 – 2017/5619/P) development at No. 24 Lawn Road in regards to noise and vibration;
- Inconsistency in working hours;
- Clarity required on vibration levels;

- No mention of '*provisions to ensure stability of buildings and land*' or provisions for monitoring movement;
- No mention of how existing '*very attractive and unusual red pavement*' will be protected.

## **10. Conclusion**

This application was developed after careful consideration of the officer's previous delegated report and the public's comments received during the previous application 2017/6726/P.

The elements of the design which will be visible (above ground) have been reduced in size and given a more sympathetic appearance, to protect the amenity of neighbours and preserve and enhance the conservation area.

The proposed below ground development, which was excluded from the previously refused application, is smaller than that of other approved neighbouring basements, and is fully in accordance with Camden's basement policies and CPG on basement design.