29 July, 2018

London Borough of Camden Development Management 5 Pancras Square London N1C 4AG

FAO: Jaspreet Chana and Camden Planning

Dear Jaspreet Chana,

# Comments, questions and objections to the Proposed Development at 75 Lawn Road, NW3 2XB (Application ref: 2018/2136/P)

We are the owners of 74 Lawn Road, which is the adjoined house that forms a symmetric twinned pair with 75 Lawn Road, the proposed development site. Together we form one of the 5 twinned pairs of (originally) 2-storey 1920s Arts & Crafts style houses that line the west side of Lawn Road.

This row of houses on Lawn Road has been deemed to make a positive contribution to the Parkhill and Upper Park Conservation Area.

74 Lawn Road shares a long 11 metre party wall with 75 Lawn Road. Our house is the property that is most at risk of movement and most directly affected by the proposed large basement and rebuild development.

## Scale of development

When put up for sale last year, estate agents Knight Frank marketed 75 Lawn Road as offering a total of 204.6m<sup>2</sup> gross internal area (GIA), including the existing garage.

The Design and Access statement says the proposed project will add a total of 196m<sup>2</sup> additional GIA.

Thus the house will double in size. This is a large redevelopment project in the context of a quiet residential street and for the next door neighbours. It proposes the near total demolition of the existing house, excavation of a basement that extends beyond the existing footprint, and the construction of a new house above ground.

For background, the first planning application to develop this site (2017/6726/P) was refused in March 2018. That application did not include the basement.

#### Guide to this submission

We comment below on four areas relating to this application (2018/2136/P).

- 1. Structural impact and predicted damage to 74 Lawn Road
- 2. Construction Management Plan
- 3. Design
- 4. Demolition

## Application documents

The planning application includes 17 documents, running to 485 pages and 269MB of data. The length of our submission should be viewed in that context.

The most difficult application document to access was the 95-page Part 1 of the Basement Impact Assessment (BIA), which was provided on Camden Planning's website as a 166MB TIFF file. The BIA is arguably the most important document for the immediate neighbours as it addresses the key structural and engineering elements of the project. But this 166MB TIFF file is challenging to download, does not allow word searches, and can only be navigated by clicking consecutively through individual pages. The shorter Parts 2 and 3 of the BIA were provided in PDF format.

• This BIA 166MB TIFF file should be provided urgently in a manageable format on the Camden website and should be in a user-friendly format when sent to Campbell Reith.

## 1. Structural impact and predicted damage to 74 Lawn Road

The Basement Impact Assessment (BIA) was submitted in 3 separate files and totals 159 pages, with no overall numbering system.

We request that when the technical documents are sent to Campbell Reith that our comments below on structural impact and predicted damage are included. Thank you.

We comment below on these areas:

- 1. Damage assessment based on incorrect measurements of our house
- 2. Cumulative impact and 'special conditions'
- 3. Reliance on Camden Council Burland Scale damage limits that have been superseded
- 4. Impact of demolition at no. 75 on damage predictions for no. 74
- 5. Damage assessment based on many assumptions
- 6. Damage assessment on far side of house
- 7. Impact on garden wall and inadequate rear 'set back'
- 8. Underpinning of party wall and new foundations
- 9. 'Short term' vs 'long term' damage predictions
- 10. Ground water and water run-offs
- 11. Surety

We appreciate that it is possible to build basements and respect the applicants' desire to do so. However, the technical and structural issues that affect our house need to be taken seriously.

## POINT 1: DAMAGE ASSESSMENT BASED ON INCORRECT MEASUREMENTS OF OUR HOUSE

We strongly object to the fact that the predictions of damage to our house have been based on an incorrect configuration and incorrect measurements of the rear of our house. How can the results of all the detailed modelling be reliable if data fed into the model contain such basic errors?

As the owners of 74 Lawn Road, the most important information relates to the predicted damage to our house. The BIA is submitted as 3 separate files. This material includes:

- BIA Part 2, Table 4-3, page 15 provides a summary of structures at the back of 74 Lawn Road.
- BIA Part 2, Table 4-4, page 15 provides a Ground movement / Building Damage Summary for the walls itemised in Table 4.3.
- BIA Part 2, Figure 5, page 22, draws an outline of the back of 74 Lawn Road and labels the walls that are being assessed for damage: PW1, W1, W2, W3, W4, W5.
- For 74 Lawn Road, the greatest potential for damage (Category 1 Very slight) is for the party wall (PW1) and what is shown as an external rear wall (W4).

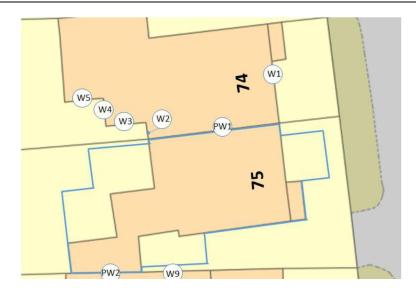


Figure 1: From BIA Part 2, Figure 5, page 22 (cropped in size by us)

## **COMMENT:**

- These important calculations of the predicted damage to our house are based on an incorrect drawing (see Figure 1 above) of the back of our house and incorrect measurements.
- BIA Part 2, Figure 5, page 22 (Figure 1 above) shows W4 as an external wall. Table 4-3 says it is 2.2 metres long. This is incorrect: W4 is an internal wall that supports a steel beam that carries the whole of the weight of that part of the original back of the house, and W4 is only around 0.8 metres long, not 2.2 metres.
- BIA Part 2, Figure 5, page 22 (Figure 1 above) shows W5 as stepped back from W3. <u>This is incorrect</u>; it is in the same line as W3. We have a late 1970s/ early 1980s 1-storey extension across the whole of the back of our house; the original back of the house is in line with W4.
- BIA Part 2, Table 4-3, page 15 gives W2 as 1.3 metres long. This is incorrect, it is 3.6 metres.
- <u>A whole section of our one-storey extension is missing</u> from BIA Part 2, Figure 5, page 22 (Figure 1 above). W3 should extend to the line of the back of the house.
- Does Fairhurst know W2 is a full-width floor-to-ceiling glass window and W3 includes a large window?

It is very risky to base the BIA damage assessment for our house on incorrect drawings and incorrect measurements.

We were not asked for access to our house for the engineer but would willingly have provided it so that an accurate on-site understanding of our house could be achieved for the BIA. We are still happy to provide access, at a convenient time.

Please could Fairhurst also take into account that **it is not entirely accurate to describe No. 74 as a 2-storey house, as the BIA states**. The attic level at 74 was semi-converted 30 years ago by the previous owners and used as a photographic studio, with two velux windows that can be seen from the garden of No. 75. It was accessed previously by a fixed permanent staircase from the 1st floor.