

29th January 2020

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By email: nathaniel.young@camden.gov.uk

Dear Mr Young

Application 2019/6236/P - Flat Ground Floor 15 Lyncroft Gardens London NW6 1LB

I am writing to **object** to this development.

I note that:

'The Council will normally resist basement development fronting the highway due to its impact on the appearance of the Conservation Area.'

(West End Green Conservation Area Appraisal and Management Strategy p.48)

I hope that this letter will provide evidence in support of Camden's planning policies and that the council will agree that there are no grounds to depart from its approach to resist new basement developments in Lyncroft Gardens and will **refuse** planning permission. My comments address the council's guidance on basements, the West End Green Conservation Area (WEGCA) strategy document and the planning history of basements in the street.

Camden Planning Guidance: Basements

Clause 1.4

Especially by virtue of its scale, the development will cause harm to the amenity of neighbours for many months during its construction, affect the stability of buildings which have a history of subsidence issues, potentially cause drainage problems and damage the character of the WEGCA. The development comprises the largest and deepest basement in Lyncroft Gardens, consequently it is not subordinate to the host building or the street.

Clause 1.12

The development is of low design quality, it is negligent of the heritage values of the Conservation Area in general and those of Lyncroft Gardens in particular. It is the most unsustainable carbon-intensive residential construction imaginable by virtue of the vast number of vehicular movements necessary to excavate the site and the volume of reinforced mass-concrete construction.

Clause 1.18

The development harms the architectural character of the building, it fails to preserve or enhance the West End Green Conservation Area. The development singularly fails to achieve sustainable development.

Clause 1.19

The applicant did not consult with neighbours before submitting their application, in particular, they failed to confirm a Full Planning Application had been made.

Clause 2.3

The development comprises the whole foot-print of the property, doubling the area of the applicant's ground floor flat. It is estimated the construction will take 8-10 months and require over 80 skips for the excavation alone. There would be significantly more vehicle movements to bring materials to site including HGV's for ready-mixed concrete. Lyncroft is a quiet residential street, the development would create all the disturbance of a major construction site, especially in respect of traffic, deliveries and parking issues.

Clause 2.10

The development includes new basement windows on the street frontage. The windows are not of a size that are clearly subordinate to the higher level openings and therefore they do compete with the balance of the host building. There is insufficient information to confirm they are timber sliding-sash casements, in accordance with the Conservation Area character. The development includes a pair of doors opening on to a light-well, this is clearly at odds with the planning guidance and again, the Conservation Area.

Clause 2.11 (and 2.13)

The buildings on Lyncroft Gardens were not built with light-wells and this absence defines the character of the street. Non-conforming developments at 23 and 35 Lyncroft Gardens were consented before the planning guidance and the extension of the Conservation Area. The proposed light-well at No.15 is clearly non-compliant with planning guidance nor is part of the established street character.

Clause 2.12

The development includes a light-well that will harm the architectural character of the host building, the character and appearance of the surrounding area and the relationship between the building and the street.

Clause 2.15

The front garden of No.15 Lyncroft Gardens is shallow, the development includes a light-well that consumes a significant part of the garden, consequently the light-well is non-compliant with current planning guidance.

Clause 2.24

The information provided with the application does not comprise a comprehensive Management Plan that demonstrates an understanding of the character of the WEGCA or how it will be protected during demolition and construction. Lyncroft Gardens is one of the last streets in West Hampstead to have original yorkstone pavements. Recent basement developments have pulverised the pavements and harmed the quality of the street-scape. The scale of the development at No.15 is a significant threat to the valuable fabric of the street, especially in respect of vehicular movements, skips and HGV deliveries.

Clause 5.4

Lyncroft Gardens has suffered throughout 2019 and into 2020 from major works at No.3 and No.23. The residents need a break and the prospect of another year of construction is really unwelcome. There should be a moratorium on basement excavations while the effect on householders (other rate-payers) is properly assessed. Especially by virtue of its scale, this development will have an unreasonable impact on residents' lives.

Clause 5.10

The development comprises the most unsustainable carbon-intensive residential construction imaginable. For example, the BRE Green Guide gives ratings for basement construction at 240KgCO₂/Kg compared with blockwork cavity walls at 74KgCO₂/Kg.

(Source: <https://www.bregroup.com/greenguide/ggelementdetails.jsp?eid=18794>)

Furthermore, the DAS fails to address materials, resources or energy. This can be explained by the impossibility of justifying the significant excavation necessary and the dependence on

reinforced mass-concrete construction. The development is completely dependent on unsustainable construction methods and materials. The DAS doesn't include any measures to improve the energy efficiency of the development.

Design and Access Statement

The DAS doesn't demonstrate an understanding of the character of the WEGCA against which to justify the planning principles. It fails to explain issues relating to access, in particular how the construction will be managed without obstructing access to No.13, No.15 (upper flat) and No.17.

WEGCA Appraisal and Management Strategy

7.1 Quality of Applications

While it should, the DAS does not specifically address the particular characteristics identified in the appraisal, including the scale and character of the repeated terraced forms.

7.2 Generic Guidance

The development does not preserve or enhance the character or appearance of the WEGCA. The Council will normally resist basement development fronting the highway due to its impact on the appearance of the Conservation Area. On both counts, the application should be refused

Planning Context

The North side of Lyncroft Gardens comprises paired terraced houses, each with a modest basement providing access to outside and a storage space presumably intended for coal. The original basements are mostly in use for varying purposes. There were three enlarged basements in existence when the WEGCA was extended in February 2011, at No.3, No.23 (1998/PW9802246) and No.35 (2007/3446/P). The extension of the conservation area was a specific response to such insensitive developments (including roof extensions) with the intention of preserving and enhancing the street. The recent developments at No.3 (2019/0718/P) and No.23 (2018/3377/P) did not create new basements, the floor areas were existing but were instead designed to increase the internal heights. These consents do not set a precedent for new basements that are counter to the policy '*to normally resist basement development fronting the highway*' in the conservation area. Thus, basements at No.3, No.23 and No.35 cannot be used to justify a new basement development at No.15.

Summary

Camden Council should refuse permission for this development:

- It is planning policy to resist basement development fronting the highway;
- It is not compliant with planning guidance for basements;
- It is not compliant with the aims and objectives of the Conservation Area;
- It is the most unsustainable type of development;
- Its construction would cause immense inconvenience to local residents for many months.

Yours Sincerely

