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Planning Solutions Team
Planning and Regeneration
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Dear Mr. Alexandre,

Re: 75 Lawn Road, NW3 2XB

www.camden.gov.uk/planning

Thank you for submitting a pre-planning application enquiry for the above property which was received with payment of £432.69 on 1st April 2020.

Development Description

Erection of front and rear extensions involving substantial demolition works.

Assessment

Demolition works:

75 Lawn Road is part of a development built in the 1920s. These houses are built in a particular Arts & Crafts-influenced style which is very redolent of the time at which they were built. There is a palette and repertoire of material and architectural detailing that are particular to this group of houses; further work and extensions should respect this.

The proposal appears to be for wholesale demolition and redevelopment of the existing house. The only notable part of the original house that is proposed for retention is the existing front façade and part of the south flank elevation.

No 75 is identified as a positive contributor with the conservation area. The building thus has Non-Designated Heritage Asset status and as such has protection under policies within the NPPF. The level of proposed demolition is not supported by local or national policies on either heritage grounds or current climate-related and whole carbon lifecycle considerations.

The strong design ethos of this early 20th century group of houses should be respected in any refurbishment and such details as fenestration, roof design, materials, joinery detailing etc. should be replicated from the original building.

In correspondence with officers (05.02.2019) during a previous planning application it was stated that substantial demolition to this non-designated heritage asset within a conservation would not be supported:

“This application is proposing the demolition of the entire property apart from the front façade and part of the left hand wall which faces towards No.76. This is considered to be substantial demolition within a conservation area (and the property is also a positive contributor) which is not supported by Camden Councils Policies D2 Heritage and CC1 Climate change mitigation.

Policy D2 (f) states: ‘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...unless circumstances are shown that outweigh the case for retention’.

Within the submitted planning statement it is stated that 'prior to the purchase of the property, a building survey report was prepared by Malcolm Hollis LLP (which hasn't been submitted as part of this application) which is said to conclude 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 the design and access statement can be substantiated by this independent assessment of the property'. Within the applicant's design and access statement it refers to works to refurbish the property, damp throughout, poor waterproofing, insufficient ventilation and the roof requiring significant repairs. All these refurbishment works may be significant but can realistically be done without demolishing almost the whole house. Nowhere has it been demonstrated with proper justification in this application that the condition of the house is so severe that the dwelling would need to be demolished to that extent in order to achieve a good standard of living. It appears from the stated works to be done that these can be achieved without demolishing the entire dwelling, unless the applicants can prove otherwise.

Furthermore, Policy CC1 (Climate change mitigation) points (e) and (f) state: We will 'require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and expect all developments to optimise resource efficiency'. The policy strongly encourages applicants to sensitively alter or retrofit a building before demolition is considered. As many historic buildings display qualities that are environmentally sustainable and have directly contributed to their survival. All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. As this has not been demonstrated within this application we cannot support the substantial demolition of the existing property.

Therefore, based on the above the current substantial demolition of the property is contrary to Policies D2 (Heritage) and CC1 (Climate change mitigation) and would not be supported in any of the three applications and would become an additional reason for refusal."

This remains the case under the current pre-app proposal. During pre-app discussions officers were referred to a section 5.0 within the pre-planning statement. The pre-planning statement suggests that the demolition would not cause harm to the heritage asset given that it would be rebuilt and set back from the front of the property; it also suggests that retention would not be financially viable, safe or environmentally justifiable. This section of the statement appears as an opinion without any notable evidence demonstrating why it would be unsafe or environmentally unjustifiable to retain and improve the existing building. No quantifiable comparison has been offered between the benefits of retaining, repairing and retrofitting versus demolition in terms of the optimization of resources and energy use. The Council's conservation officer has reviewed the proposal and disagrees that demolition would cause no harm to character and appearance of the positive contributor and wider conservation area and strongly recommends that the walls are retained.

Officers were also at a later stage referred to a letter prepared by 'engineersHRW' dated 09.06.20. The letter stated that there is potential subsidence damage to the rear of the property, and that temporary support of the first floor would be required in order to carry out underpinning work. However, it also suggested that the damage is repairable and that, while the retention of existing walls would require temporary supports, it was in fact achievable at the cost of 'compromising the construction sequence'. Officers do not consider delays or the compromising of the construction sequence to be sufficient justification for demolition when it is possible to retain the walls.

The following advice is given regarding the other proposed alterations and extensions-

First floor front/side alteration:

- Unacceptable on design grounds.
- Represents an incongruous addition at an elevated level, out of keeping with the

surrounding properties.

- Unlikely to have residential amenity impact given its size and siting.
- The submission of a similar application at No. 76 does not justify the proposed alteration, No. 76 proposal has not been approved and is unlikely to be supported.
- Nos 75 and 76 have a side extension in common. Since both properties have proposals to reconfigure this later extension, some collaboration in design should be entered into. The recommendation is that the side extensions have a joint hipped roof with each house having a limited-sized two light front facing dormer.

First floor rear extension:

- Acceptable, modest increase in bulk and mass which would be subordinate to host property using appropriate materials.
- Extension would not infringe key outlook lines, and would be unlikely to result in an undue loss of light or outlook.
- Applicant has sufficiently addressed previous reasons for refusal for this element of the proposal.

Please see appendix 1 for supplementary information and relevant policies.

Thank you for using Camden's pre-application advice service; I trust this is of assistance in progressing your proposal.

Yours sincerely,

Nathaniel Young

Planning Officer
Planning Solutions Team

Appendix 1:

Relevant Constraints:

Parkhill Conservation Area

Relevant History:

2017/6726/P: "Erection of part one/part two storey side and rear extensions, side and rear dormer windows, alterations to driveway and associated works." Refused 14.03.18.

2018/2136/P: "Formation of new basement level with front and rear lightwells, single storey rear infill extension, part single, part two storey side extension, side and rear dormer windows, front and rear landscaping, alterations to driveway and associated works." Approved subject to S106 agreement 20.02.20.

2018/3114/P: "Erection of part one/part two storey side and rear extensions, front, side and rear dormer windows, alterations to driveway and associated works." Refused – appeal dismissed 17.06.20.

Relevant Policies and Guidance:

National Planning Policy Framework (2019)

The London Plan (2016)

Camden Local Plan (2017)

A1 - Managing the impact of development

D1 - Design

D2 – Heritage

Camden Planning Guidance 2018

CPG – Design

CPG – Amenity

CPG – Altering and extending your home

Parkhill and Upper Park Conservation Area Statement (2011)

Planning application information:

The following documents should be included with the submission of a full planning application:

- Completed full planning application form
- The appropriate fee (£206.00)
- Location Plan (scale 1:1250)
- Site Plan (scale 1:200)
- Floor plans and roof plan (scale 1:50) labelled 'existing' and 'proposed'
- Elevations and sections (scale 1:50) labelled 'existing' and 'proposed'
- Design and Access statement (necessary for Major applications, Listed Buildings, development within conservation areas, change of use applications (with physical changes), and development of over 100sq. m).
- Heritage statement
- Please see the following link to supporting information for planning applications

<https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements-/>

We are legally required to consult on applications with individuals who may be affected by the proposals. We notify neighbours by displaying a notice on or near the site and placing an advert in the local press. We must allow 21 days from the consultation start date for responses to be received. We encourage you to engage with the residents of adjoining properties before any formal submission.

Non-major applications are typically determined under delegated powers. However, if we receive three or more objections from neighbours, or an objection from a local amenity group, the application will be referred to the Members Briefing Panel if officers recommend it for approval. For more details click [here](#).

Please Note: This document represents an initial informal officer view of your proposal based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.