

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

November 2020

FAO: Nathaniel Young and Camden Planning

Dear Nathaniel Young,

Objections to the Proposed Development at 75 Lawn Road, NW3 2XB (Application ref: 2020/3726/P) – INCREASED DEMOLITION AND CMP

We are the owners and occupiers of 74 Lawn Road, the house adjacent and attached to 75 Lawn Road.

This document presents our objections to the proposed increased demolition of 75 Lawn Road. A separate document has been submitted regarding objections to the 2-storey rear infill extension.

Since 2017 there have been 5 relevant planning applications by the applicants, each with its own proposed scale of demolition:

- App 1: 2017/6726/P – refused by Camden Planning
- App 2: 2018/2136/P – approved by Camden Planning after proposed demolition was reduced
- App 3: 2018/3114/P – refused by Camden Planning and on appeal by the Planning Inspectorate
- App 4: 2018/3428/P – refused by Camden Planning and on appeal by the Planning Inspectorate
- App 5: 2020/3726/P – the current application

Demolition issues raised in Application 2020/3726/P

The proposed additional demolition included in Application 2020/3726/P affects 3 separate parts of the external wall and we address these separately:

1. Side wall by driveway at the front of the house. We object to this.
2. Rear wall of rear reception room abutting 75 Lawn Road. We object to this.
3. Side wall of outrigger at rear of house. We object to part of this additional demolition and do not object to the rest of it.

Overall extent of demolition

When considering the conservation and environmental arguments from the applicants, Camden should bear in mind that the whole of the house inside the external walls will also be demolished. This is not shown on the drawings, which only indicate the external walls and roofs that the applicants have asked to demolish. The overall scale of demolition in terms of the environment is therefore huge, even under the plans approved for App 2 (2018/2136/P).

1. Side wall by driveway at the front of the house

Using the documents that are publicly available on the Camden website we believe that there may be an inconsistency in the applicants' representation of the previously approved extent of demolition. We may be mistaken but ask that Camden checks this before making any decision.

The approval decision letter for 'App 2' (2018/2136/P) dated 2 April 2020 states clearly that Drawing 2_101 Rev C (in the document *Existing floor plans showing revised demolition (amended)*) is the approved drawing. This shows the approved extent of the demolition at ground floor level. This drawing is cut and pasted below as Figure 1, taken from the Camden Planning website. Drawing 2_101 Rev C was also cited in the Legal Agreement between the Applicant and Camden, signed 2 April 2020:

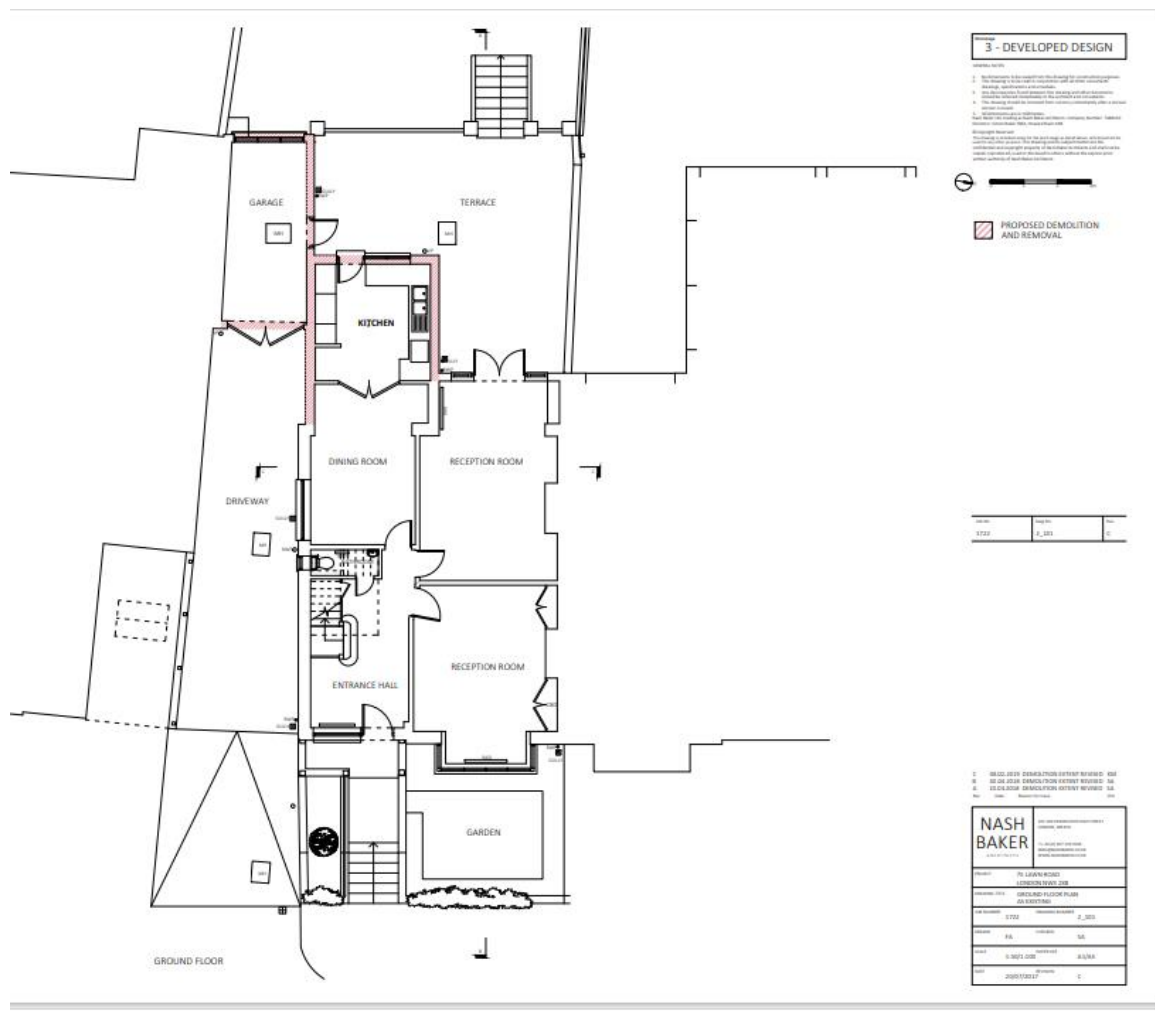


Figure 1: Approved drawing 2_101 Rev C from App 2 (2018/2136/P) – Ground floor demolition in red

We compared this with the drawing that has been included in the current App 5 (2020/3726/P), which is presented as showing the additional demolition that is now being applied for, over and above what this application states was granted under the approval of App 2. Figure 2 pastes that drawing below for comparison.

[illegible]

We believe that in Figure 2 the external ground floor wall hatched in red inside our added red circle should be hatched in blue and designated as “proposed additional external demolition” and not “extent of external demolition approved under application 2018/2136/P”.

The fact that this wall will become an internal wall at ground floor level, with a door opening, does not stop this being additional demolition that was seemingly not approved under App 2 (2018/2136/P).

We therefore object to the application to demolish this part of the external wall at ground and/or 1st floor level. At ground floor, much of this wall can be retained under the proposed internal room plans with door openings where needed; at 1st floor level this should remain as the publicly visible external wall of the house, for all the reasons cited by Camden Planning in its pre-application advice letter, which refers to Policies D2 (Heritage) and CC1 (Climate change mitigation).

2. External wall of rear reception room abutting 75 Lawn Road

The proposed additional demolition is shown in Figure 3 inside our red lines. According to the drawings submitted for this current application (App 5 2020/3726/P), the whole of this section at ground and 1st floor is proposed for demolition. In addition, the current flat roof above the ground floor windows will also be demolished. (Why is this low-level flat roof not shown as demolished in any drawings? It is not easy to see this single storey projection in the photograph but it is clear in the applicants' drawings.)



Figure 3: Showing additional proposed demolition adjacent to No.74 Lawn Road (excerpt from applicants' Design & Access statement)

When the applicants agreed to reduce their proposed demolition as part of gaining approval for App 2 (2018/2136/P), this included agreeing to keep these walls. Now all this section of the original house is proposed for demolition. App 5 Drawing 6_101 (ground floor) shows side sections being removed but the intention is that the whole of this ground floor wall is demolished.

The cover picture of the Design & Access Statement, plus Figures 2 and 7 of the Statement show the rear of No 75 and part of the rear of our adjacent house (No.74). These original external walls are all contiguous with the equivalent walls on our house.

These walls should be retained in the same way as the front façade of the house is being retained, for the general reasons summarised further below.

We object to the proposed additional demolition of the walls shown within the red lines in Figure 3.

3. Side wall of outrigger at rear of house (north-facing wall)

We think (but have no way of knowing) that when the applicants scaled back their demolition plans to win approval for App 2 (2018/2136/P) they meant to scale them back to the demolition that was proposed for App 1 (2017/6726/P). This would have made sense as demolition was not a reason for refusal of App 1 and the Planning Officer's report approving App 2 refers to agreed demolition of the outrigger.

We also think (but have no way of knowing) that the applicants therefore may have made a drafting error when they submitted the revised drawing number 2_102 Revision C (for App 2) and that they meant it at 1st floor level to be identical to the equivalent drawing for App 1 i.e. App 1 drawing number 102. Figures 4 and 5 show the relevant excerpts for App 1 and App 2 respectively, with the difference highlighted by our red circle. It is the omission in Figure 5 at 1st floor level, which was included in Figure 4, that we are referring to.

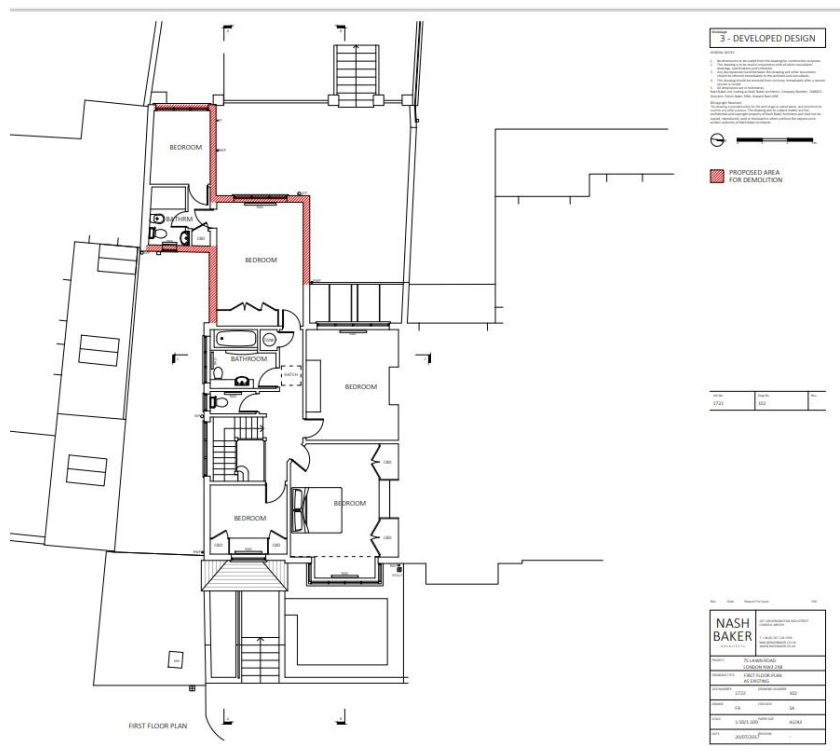


Figure 4: App 1 (2017/6726/P) – Proposed 1st floor demolition.

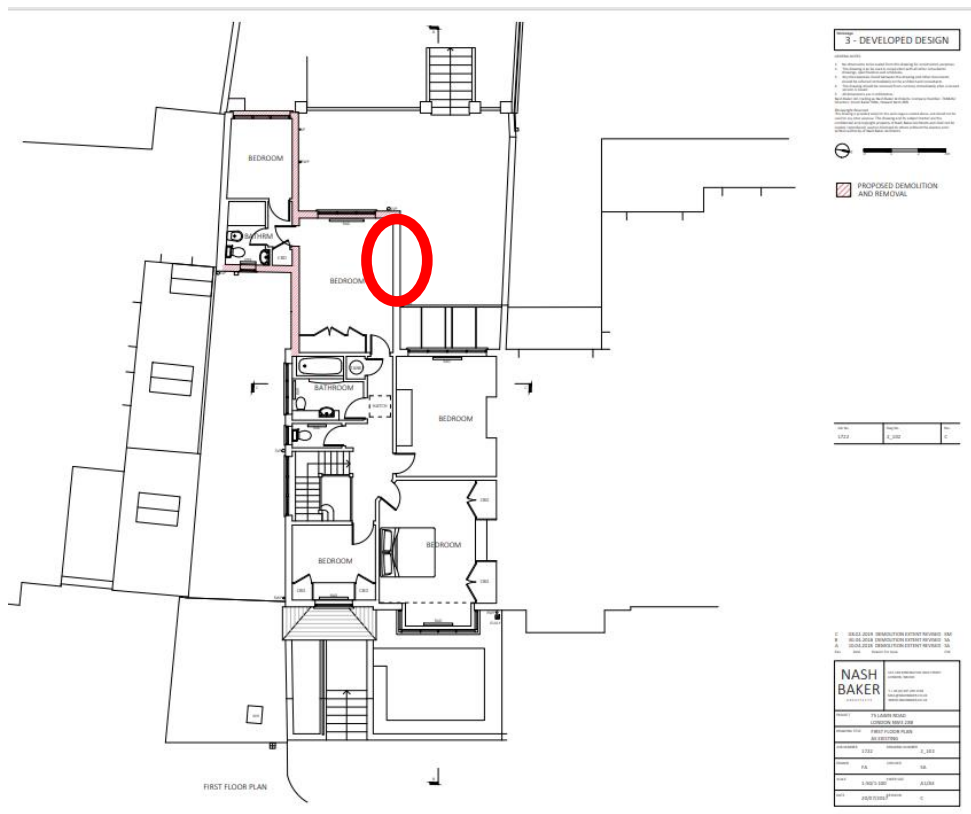
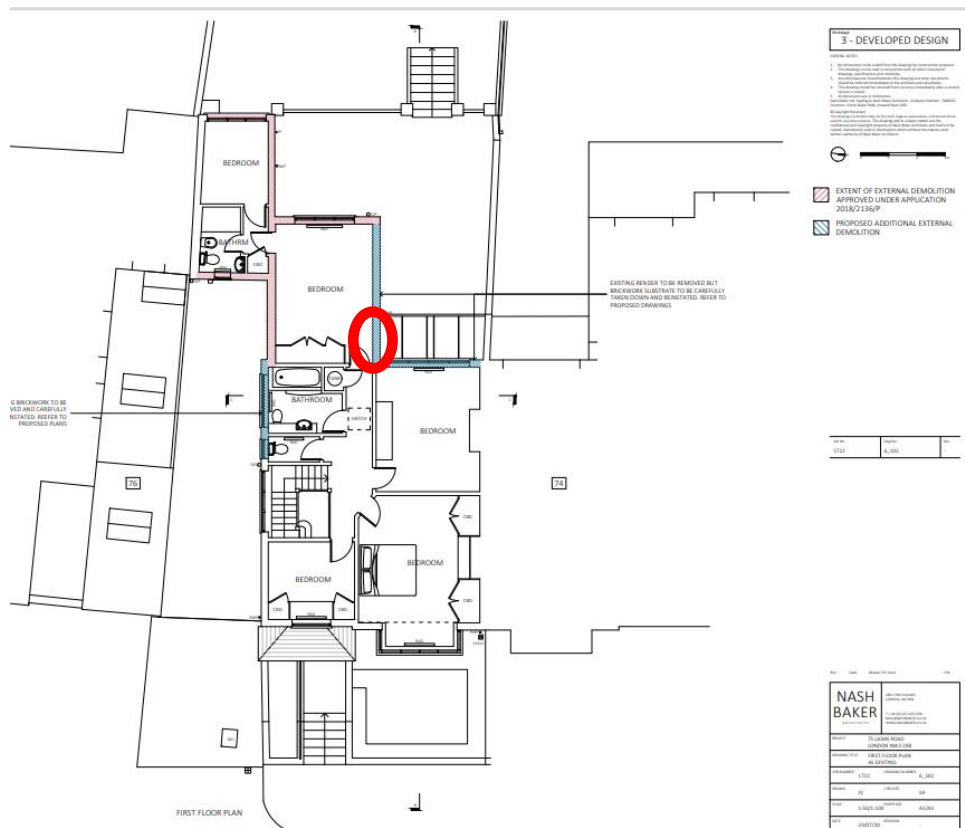


Figure 5: App 2 (2018/2136/P) – Proposed 1st floor demolition. Difference with App 1 (Figure 4) highlighted by our red circle

- We very much regret that Camden allowed the extensive demolition shown in App 2's *Existing floor plans showing revised demolition (amended)* and believe that this scale of demolition is still not supported by Policies D2 (Heritage) and CC1 (Climate change mitigation). However, that approval has unfortunately set the starting point for any further demolition requests.
- We think that in fairness to the applicants it should be established whether it was intended that App 2's *Existing floor plans showing revised demolition (amended)* should differ from the demolition as proposed in App 1; and whether Camden intended for this section of 1st floor wall on the outrigger to be retained.
- We do not oppose this specific element of additional demolition i.e. in line with Figure 4 above. It is the only part of the outrigger that would not be demolished and the supports needed for its retention do not contribute to the retention of the other walls where additional demolition is being requested, to which we object.

Regarding the latest planning application App 5 (2020/3726/P), Figure 6 shows what additional demolition is now proposed at 1st floor level. This reinstates the 'missing' section of demolition that disappeared between Figures 4 and 5 above, which is discussed above and to which we do not object. However, it also adds an additional section of demolition, when compared against App 1, which we have highlighted in Figure 6 using a red circle.



under App 2 (2018/2136/P) is a project that has been conceived with combatting climate change in mind. The project is hugely energy and materials intensive. Furthermore, if no basement were being built the issue of approval to demolish these additional walls would not arise; indeed more of the external walls could be retained as has been the case at the other 1920s houses on Lawn Road where extensive renovations have taken place without a basement excavation. So it is unconvincing to argue that additional demolition should be viewed as “public benefit” given the overall environmental impact of the scheme.

- That it is “unnecessarily challenging”: Building any basement is a challenge. The front façade and part of the side façade of No.75 will have to be propped and “temporarily supported” as they are not being demolished under any proposal. And the whole of the 11-metre party wall with No.74 will have to be propped and the whole of our house supported. Adhering to the approved level of demolition under App 2 (2018/2136/P) is no more challenging.
- That “it would otherwise be costly to construct” and “is not financially sensible”: The total cost of purchasing the house (£3m) and a huge basement excavation plus the numerous planning applications suggest that cost is not a limiting factor.
- That a refusal of the additional demolition “will potentially lead to logistical complications for the contractor”: This is not a justification – the logistical challenges of building a basement on this site will always be formidable.
- That it would reduce safety hazards to workers: All the Welfare issues raised at the top of page 23 of the Design & Access statement will still apply to the development regardless of this proposal for additional demolition. If the risks can be mitigated for all other aspects of the development, then this is also the case for these walls.
- That it “would delay the construction sequence and thus extend the overall project programme” and cause “delay to the owners moving in”: The house has been empty since purchase more than three years ago with long periods of inactivity so a bit of extra time is no justification.
- That the walls will be rebuilt “with the existing brickwork where possible”: This would be a very time-consuming and expensive endeavour.

We do not believe that the applicants have overcome the Council’s reasons for refusing the additional demolition proposed in the current application (App 5), as set out in the officer’s pre-application advice.

Loft level demolition

Separately, we query why Drawing 6_103 of the current proposal shows the planned demolition at loft level. As drawn, this includes the complete demolition of the party wall at loft level which a) would not be permitted b) would leave our loft without any wall c) needs to be corrected on the drawings.

Construction Management Plan and lack of consultation/engagement with neighbours

We have discussed these comments with neighbours and make them jointly.

On 9 November 2020 several houses on Lawn Road and some on Downside Crescent received a letter through the door from J&Z Construction Ltd saying that works would start at 75 Lawn Road on 16 November 2020 “(subject to council’s approval)”.

The only consultation/engagement by No.75 Lawn Road dates back to April 2018 when we were all given a mere 7 days to comment on a draft CMP.

That is now more than two and a half years ago.

The only draft CMP that we have seen is dated April 2018. Does there not have to be an updated CMP that takes into account, for instance, the reduced demolition that Camden required for the approved App 2 (2018/2136/P)?

Several residents on Lawn Road submitted comments to Camden Council on App 2 (2018/2136/P), for instance requesting:

- That a Construction Working Group be set up with local residents so that we could have a positive and active forum in which to discuss the sort of issues that arise during basements developments, such as timings of large vehicles arriving in the morning, other vehicle movements, noise, and damage to pavements.
- Clarifications for inconsistencies in some of the technical details in the draft CMP, especially regarding noise thresholds/times and vibration thresholds. We refer Camden Planning to pages 12-16 of the comments submitted by No.74 Lawn Road, dated 29 July 2018, for App 2 (2018/2136/P).
- No Saturday morning working (as was offered by No.77 Lawn Road for its basement works).

Why have neighbours not been given the opportunity to read and comment on an updated CMP?

Camden should ensure that the applicants meet the expectations of the Council regarding meaningful consultation and realistic deadlines for feedback over the lifetime of this large basement project. We are keen to engage constructively and amicably.

Thank you for considering our points.

Richard Tomlinson and Teresa Poole