We are the owners and residents of 79 Lawn Road NW32XB and object to aspects of the current planning application at 75 Lawn Road (2020/3726/P).

**1. Demolition**

The property is within the Parkhill and Upper Park Conservation Area. The Area’s Appraisal and Management Strategy defines Numbers 70-75 Lawn Road as making a positive contribution to the Conservation Area and states: “The Council will not grant consent for the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area.” This follows Policy D2 of the Local Plan.

This application seeks consent for the demolition of a very substantial part of the original 1920s building, internally and externally. The Plans show the huge extent of the demolition that is proposed. The scale of the proposed demolition is significantly more than was approved by the Council for the previous application (2018/2136/P), which also included a basement. Indeed, the applicants agreed to reduce the amount of demolition for 2018/2136/P at Camden’s request. This scale of demolition goes against two key Policy documents:

*Camden Local Plan, 2017. Policy D2 Heritage, page 235: 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”.*

*Parkhill and Upper Park Conservation Area Appraisal and Management Strategy, 2011. “The Council*

*will not grant consent for the total or substantial demolition of an unlisted building that makes a*

*positive contribution to the character or appearance of a conservation area.”*

There are also other environmental construction policies that this scale of demolition appears to

conflict with e.g.:

***GLA Sustainable Design and Construction SPG 2014:*** *Section 2.7.8: Design Stage, Managing existing*

*resources. “Developers should always look for options to sensitively reuse, refurbish, repair and*

*convert buildings, rather than wholesale demolition.”*

***Camden Planning Guidance CPG 3 – Sustainability:*** *Section 8.4 Managing existing resources: “You*

*should always look for options to sensitively re-use, refurbish, repair and convert buildings, rather*

*than wholesale demolition (see Camden Development Policies paragraph 22.4). This will reduce the*

*amount of resources used and will help reduce construction waste.”*

Seen in this context, the additional demolition envisaged for this application (2020/3726/P) clearly conflicts with Conservation Area Strategy and the Local Plan, Policy D2. The applicants fail to provide any persuasive reasons for why the Council should nonetheless give its consent.

 In the Pre-Application response letter dated 10-06-2020 Camden has been absolutely clear that ‘the level of proposed demolition is not supported by local or national policy on either heritage or current climate related and whole carbon lifecycle considerations’. The Applicants have ignored this advice and have added a report by Green Structural Engineers seeking to justify the wholesale demolition. This report is wholly unconvincing. For example, in referring to ‘Embodied Carbon’ it makes no reference at all to the impact of the embodied carbon in the additional demolition waste arising from these proposals. Authoritative studies like the paper on ‘Refurbishment and Development of Housing - Embodied Carbon’ issued by University College London state that refurbishment is preferable to demolition because of this. The Applicants clearly wish to demolish the house because it is cheaper to do that than to carry out a refurbishment. It is entirely unnecessary, for example, to demolish and rebuild existing walls in order to improve the “energy efficiency” of the existing property (page 23 of Design & Access Statement). There are many alternative methods available to the applicants which do not require wholesale demolition. It is also unacceptable to cite the safety of builders working on the basement, which the applicant chose to add to the existing property, as a reason for demolishing the ‘floating’ masonry walls. Green Structural Engineering’s statement that adhering to the scale of demolition approved under 2018/2136/P “will potentially lead to logistical complications for the contractor” is not a reason to permit the additional demolition. Nor is the complaint that it would be more “costly” and is “not financially sensible” (D&A statement).

In the Design and Access Statement the Applicants’ architects state that they can ‘clearly justify to the Council within this Design and Access Statement and Green Structural Engineers supporting letter (dated 03.08.2020) that the careful replacement of the walls far outweighs their retention in terms of sustainability, safety and heritage grounds’ They do not provide this justification or any basis for departing from Camden’s policies.

The Council should adhere to its pre-application advice (Appendix C) that “the current substantial demolition of the property is contrary to Policies D2 (Heritage) and CC1 (Climate change mitigation) and … would become an additional reason for refusal.”

**2. 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 which was wholly inadequate for a project of this scale and impact. 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? The letter from J&Z Construction Limited suggests that work will be undertaken between 8.00 and 18.00 Monday to Friday and 8.00 to ‘190’ on Saturdays. This means that neighbours in this quiet residential area will have no respite at all and is bound to lead to conflicts and adverse impact on health.

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.

**3. Two-storey rear infill extension**

We see that the applicants are making another attempt to secure planning approval for a larger first floor rear extension as part of the infill extension. We object to this since it is overdevelopment of the site.

Our house is of the same design style and has the same rear outrigger configuration as Nos. 72, 73, 74, 75, 79, and 80 Lawn Road. Extending at 1st floor level at the rear cannot avoid having a negative impact on the amenity of the paired house at No.74, as it would have for all of these twinned houses. Camden should refuse permission for two-storey rear extensions that extend beyond the historic original ground floor footprint.

We also note that the new proposed glazed “lantern” roof on the 1-storey element of the infill extension will be higher than the 3.3m parapet. In 2016 we applied to build a single storey rear infill extension (2016/0313/P). Camden Planning told us to reduce the height of our new 1-storey extension from the proposed 3695mm to 3150mm in order to have permission granted. How would it now be consistent to permit an overall height above 3.3m at No.75 Lawn Road?