



Ms Sofie Fieldsend
Regeneration and Planning
London Borough of Camden
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London
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Sent by Email

22 December 2022

Dear Ms Fieldsend

**Re: 71 Avenue Road, NW8 6HP
Objection to Planning Application Ref: 2022/2529/P**

We write to object to the planning application (2022/2529/P) for the demolition of the existing building and the erection of a two storey single dwellinghouse with basement and accommodation in the roof space at 71 Avenue Road.

This letter elaborates on initial points of objection made by Mr Hepher in his email of 14th December 2022.

First, we note that there are several omissions in the supporting information accompanying the application. On the basis, and notwithstanding our points of objection, we do not consider that officers can make an informed assessment of the proposals based upon the information before them.

We have identified the following documents that appear to be missing but are required according to Camden's Local Validation List:

- Heritage assessment
- Whole-life cycle carbon analysis
- Acoustic assessment
- Air quality assessment
- Proposed side elevation (side boundary with No. 69 Avenue Road)

Having reviewed the information submitted, we wish to register strong objection to the proposals on matters relating to heritage, neighbouring amenity, sustainability, and basement impact.

Heritage

The site is not listed nor is it situated within a conservation area; however, it is within the setting of the Elsworth Conservation Area (located on the opposite side of Avenue Road) and the St Johns Wood Conservation Area, which runs to the rear of the site from No.37 Queens Grove. Avenue Road has a distinctive character. The street was originally laid out in the early to mid-19th century with large semi-detached and detached villas. However, in the early part of the 20th century, many of these buildings were demolished and replaced with large detached neo-Georgian style domestic houses.

The planning application is not accompanied by a Heritage Statement; therefore, no assessment of the heritage impacts has been undertaken, contrary to Policy D2 of the Camden Local Plan ('CLP'), which requires development proposals to preserve or enhance the character and appearance of the area.



Bulk and impact on neighbouring amenity

The application site occupies a relatively modest plot when compared to other properties on Avenue Road, such as the neighbouring building, No.69, which sits within a large plot and has a spacious garden to the rear. The spacious quality of No.69 would be compromised and diminished by the proposed dwelling at No. 71, which would have the effect of creating a sense of enclosure by virtue of its size, poor design, and relationship with the neighbouring site.

Furthermore, the proposed new dwelling would occupy an excessive part of the already constrained garden, resulting in the loss of valuable garden space which contributes to the character of the townscape, as recognised by Policy A2 of the CLP. Accordingly, the proposal fails to comply with part (e) of the policy which protects “*non-designated spaces with nature conservation, townscape and amenity value, including gardens*”.

Another potential amenity concern is that of noise impact. The proposed basement plan contains a sizeable “M&E Room” of some 13.8sqm, however, no acoustic assessment has been undertaken to ensure that the development will not generate unacceptable noise and vibration impacts, as per CLP Policy A4.

Similarly, CLP Policy CC4 requires development proposals that involve significant demolition, construction or earthworks to assess the risk of dust and emissions impacts by way of an air quality assessment, which must include appropriate mitigation measures to be secured in a construction management plan. No such assessment has been undertaken for this application.

Sustainability

Policy CC1 (part e) of the CLP requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. 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.

The current proposals seek to demolish the existing house and rebuild over a larger footprint and height. There is insufficient justification (for example, carbon lifecycle analysis) within the application to warrant the complete demolition of the existing house to rebuild another one. Thus, the carbon emissions resulting from the demolition and rebuild of the proposal would be contrary to local and national planning policy.

Basement Impact

The application is supported by a Basement Impact Assessment. However, the BIA audit report by Campbell Reith raises a number of issues and concludes that the proposed basement fails to comply with Policy A5.

Summary

In summary, we consider that the proposed development is inappropriate, and that insufficient information has been provided to enable a proper assessment of the proposals in accordance with the statutory tests.

We reserve the right to provide further comments up until the determination of the application.

Yours sincerely

hgh Consulting