

Council's Response to Cranbrook Basements comments related to Listed Buildings, RBKC, April 2014

- 1.1 The potential harm caused by basement extensions beneath a listed building is multi-fold. Some examples are set out in points 1-4 below: -
1. The potential harm caused to the buildings overall special character and architectural integrity (evidential, historic and aesthetic heritage values) as a result of the creation of a non-original floor level(s) beneath the house and the impact upon the plan form, character and proportion and historic hierarchy of floor levels.
 2. Potential impact upon the structural stability of the host building and neighbouring listed buildings.
 3. The potential harm caused to both internal and external fabric of the listed building caused by the invasive nature of the works during construction.
 4. The potential harm caused to the setting and character of the listed building resulting from the external manifestations of a non-original floor level.
- 1.2 The great majority of listed buildings within Kensington and Chelsea form part of the 19C townscape and are terraced properties. These 19C terrace properties are very similar in terms of their special interest and overall significance.
- 1.3 A key element of these properties special interest is gained through the retention of their plan form and historic hierarchy of floor levels. Many feature set internal layouts with small cellular spaces located directly off a principal stairwell. The character, proportions and decorative detailing within each of these floor levels also form a fundamental part of any such properties heritage significance.
- 1.4 The creation of additional floor levels of accommodation beneath buildings such as this would have a negative and harmful impact upon the buildings special interest in that it would **serve to dilute and confuse the building's original plan form, character and proportion and set hierarchy of floor levels**. This would be considered harmful to all four of the heritage values set out in Conservation Principles 2008, aesthetic, evidential, historic and social.
- 1.5 The Council do acknowledge Paragraphs 133 and 134 of the NPPF and the potential to offset substantial and less than substantial harm against any potential 'public benefit'. However, the extension of a single private residential house for the sole enjoyment of its owner/occupier is considered to be a private rather than public benefit, which would not result in sufficient public benefits to merit approval in most cases.

- 1.6 It is the Council's view that Cranbrook basements have slightly misinterpreted the PPS5 guidance at para 182 as the guidance's main thrust is to highlight that the impact of extensions underground upon the overall significance of a heritage asset should be considered and should not be ignored simply because it may not be externally visible.
- 1.7 The harm caused by basement extensions is considered much greater than the harm caused by an above ground rear extension. It is for this reason that the Council wish to ensure that the policy review ensures that there is a general presumption against such extensions in the future.
- 1.8 The argument that a basement extension beneath a listed property should be assessed on the same basis as a rear timber framed/glazed rear extension to a building is not realistic and the two forms of extension are so different and have very different impact and implications for a listed building.
- 1.9 A modest above ground rear extension for example is likely to have far less an impact upon the overall heritage value and significance of a listed building and it is for this reason that a blanket ban/general presumption against such an addition to a listed building is not considered necessary. It is often the detailed design of such a structure that can be agreed which will ensure that it harmonises with the existing buildings, rather than being harmful in principle (as basement extensions are).
- 1.10 Modest rear extensions are by their nature much lesser building operations. They do not represent the same level of physical work to be undertaken to the listed structure. With a basement excavation, often a high level of large equipment is required to be moved on and off site (often through the listed building) which can have a harmful impact upon both internal and external fabric of the building. In some cases requiring partial demolition of the facades, boundary walls and harm to delicate internal features (such as wall panelling, joinery and plasterwork). Such invasive works are far less likely to be necessary in the construction of a modest rear extension.
- 1.11 In general, rear above ground extensions will be proportionate to the small cellular plan form of the principal listed building, as opposed to basement extensions which serve to vastly increase the physical footprint of the listed building.