**Objection to Planning Application 2024/0012/P – 194 Goldhurst Terrace**

I object to this significant and large-scale development proposal on several grounds as detailed below.

If the extent of new basement excavations proposed were to be significantly reduced, then other factors of concern could also be more easily remedied and these objections would largely fall away.

It is suggested that the construction of new basements should be confined just to the new 2-storey house at the Eastern end of the site. This would result in the elimination of one proposed Flat in the main building that is entirely at the new basement level (and therefore goes against Camden CPG Basements guidance for areas at risk of floods), and would result in 7, rather than 8, new flats.

However all these flats would be of higher quality with more generous ceiling heights and no compromises on flood risk and limited daylight or unwelcome external visual intrusions in this Conservation Area that are not in keeping with all the other houses of similar style in the vicinity. If the scale of proposed basement development is not reduced, then this application should be refused.

**1) The excessive scale of the proposed Basement Excavations and the deficient, complacent, and non-exhaustive approach taken by the BIA and the Flood Risk Assessment**

The BIA (Basement Impact Assessment) ignores the fact that in terms of the footprint and volume of material to be excavated, it is equivalent to about three 'normal' basement excavations for a 'normal' terraced/semi-detached town house in this part of the Goldhurst Terrace. This is on account of:

a) the existing house already being significantly larger than a typical terraced town-house in the area (eg. No. 192 and 190 Goldhurst Terrace- the latter of which is already in the process of having a basement excavated).

b) the footprints of the two existing single storey additions to the East side of the main house (that are claimed to be later constructions) which it is proposed to demolish and in those footprints to build a new, attached 4-storey replacement with full basement and lightwells in the same space, are themselves about the same as a 'normal' terraced house in that street.

c) the footprint of the entirely new proposed two-storey house and its garden at the East end of the site (around and behind where the garage currently stands, which is all proposed to be excavated to form a basement), including also the new very sunken patio/semi-sunken garden area (both of which are to be made much lower than the existing level of the grounds of the house -perhaps 2.5m lower) is itself at least the same as that of a 'normal' terraced house in that street.

So the immediate local area and environment will suffer the unprecedented size (for this locality) of the equivalent of 3 basement conversions in a single development. It is estimated that the area of new basement to be constructed under the existing buildings is some 230 sqm, and the new basement area for the new house plus sunken patio/garden on the Eastern end of the site is another 166 sqm- so in total an additional 396 sqm of basement area is proposed for excavation, resulting in the enormous volume of approx. 1080 cubic metres of material needing to be to be extracted and removed from the site in a succession of large skip lorries.

**2) Complacency and lack of due diligence in the BIA and Flood Risk Assessments by ignoring the two well-known recent (July 2021) extreme rainfall events and the surface flooding they caused nearby**

It should be noted that historically (before the Maryon-Wilson Estate started to develop the S. Hampstead area around 1890) the whole area comprised water-meadows and it therefore already has a high-level of ground-water. It should also be noted that the area is acknowledged as being flood-prone, with three recent major rainfall/flood events having caused flooding near the subject site in 1975, in 2002 and in 2021. (Note, the BIA and the Flood Risk Assessment documents seem to conveniently ignore the two July 2021 extreme rainfall/flooding incidents in their claims that, notwithstanding these 3 or 4 major rainfall events, there is still no flood risk).

This sadly seems to smack of excessive complacency and a lack of due diligence. It is known that in the 1975 severe rainfall event a nearby basement at 62 Priory Rd (only about 80m from the subject site) was indeed flooded. Since 1975 there have been very numerous basement conversions in the area, which can only potentially exacerbate the groundwater issue and make flooding more likely.

**3) Groundwater flooding**

Moreover the submitted Flood Risk Assessment document clearly acknowledges that there have been instances of elevated groundwater flooding in the near vicinity of the site, but then, perversely, goes on to dismiss the importance of this by stating: *"As this is just for planning stage, the applicant has not undertaken any long term groundwater monitoring, however they will at detailed design stage to ascertain the level of groundwater prior to excavation of the proposed basement"*.

This is surely putting the cart before the horse. The groundwater monitoring records are surely a key part of the evidence that must be presented to Camden Planners before they can undertake a rigorous assessment of whether it is safe and appropriate to grant Consent for such a huge scale of basement excavation on this site? It is suggested that Camden must insist on at least a full years-worth of groundwater monitoring records from boreholes at both the rear (North) and front (South) of the site before any decision can be made about the safety of the proposed new basements, and whether they should be consented.

If Permission were to be granted for these 3 large basement excavations simply on the presumption that groundwater is not excessively high, then what will happen if it is found to be too high?

From the BIA/Flood Risk Assessment documentation recently done for the very nearby 190 Goldhurst Terrace, where a basement excavation is now in progress, it is understood that the ground water level in a borehole at the rear of the building (the north side facing the natural drainage slope) was only 0.8m below ground level. This is surely an excessively high ground water level in which to safely excavate a 2.5m deep basement, and does not bode well for the situation at the subject site.

There appears to be no comprehension of the fact that the general groundwater drainage slope in the area is from North to South, and therefore transverse East-West barriers to the natural flow of groundwater (such as the huge basement and garden excavations proposed at 194 Goldhurst Tce.) will cause major and unpredictable displacements to the flow, and to the groundwater levels on each side of a new obstruction (eg. a deep basement).

The Camden 'Strategic Flood Risk Assessment - July 2014' document (SFRA) discusses the very issue of groundwater flows and their displacement in paras. 6.4.3 to 6.4.7, together with a useful illustration in Fig. 6.1- 'Groundwater Flows around Basements'.

Regrettably, all this appears to have been ignored in the over-complacent BIA and Flood Risk Assessment documents. The Camden SFRA document also goes on to say (para. 6.4.6) that: *"As part of the assessment carried out for basement development it will be important to identify any potential receptors which may be affected by the change in water level. Locally within the LBC area, the main receptors are likely to be existing basements, various abstraction sources from the River Terrace Deposits and groundwater-fed water features. A basement search radius of 500m around a development is advisable to inform a basement impact assessment.*

(Note: The underlining is the author's own emphasis)

It appears that the recommendation of a basement search radius of as much as 500m has been conveniently ignored. Instead the BIA lists just a few basement developments within less than 100m of the subject site. It is likely that there will be at least 15 to 30 more new basements built in the last 30 years within a radius of 500m. The aggregate and collective effects on groundwater flows of such a large number of new impermeable basement structures, could have a significant and very unpredictable effect on the groundwater flows and levels in the area, and could easily cause unexpected and undesirable effects around existing properties and gardens.

Camden must in this case, and routinely for future cases, insist on a much more exhaustive list of recent basements built within 500m of the site before considering whether to give consent for such a large-scale and voluminous further excavation. While there are many more, for reference the very nearest 4 new basements in the immediate vicinity are at:

190 Goldhurst Terrace - currently under construction, only some 8m away from the Eastern end of the site

253 Goldhurst Terrace - already constructed and only some 25m from the site.

255 Goldhurst Terrace - already constructed and only some 20m from the site

261 Goldhurst Terrace - already constructed and only some 20m from the site

**4) Flooding from Sewers**

The submitted Flood Risk Document states that: *" There have been 8 incidents of internal sewer flooding and 18 incidents of external sewer flooding in the vicinity of the proposed development site. The sewerage system within the vicinity of the site is a combined system, so this flooding is caused by the sewers surcharging during extreme storm events. However the surface water run-off from the proposed extension will be dealt with via the use of SuDS".* This accurately represents the findings of the Camden SFRA.

But instead of raising concerns and a possible red flag, the Flood Risk Document simply explains what this flooding from sewers might be caused by. It does not question whether, in the light of the acknowledged risk, this is likely to be an issue at the subject site, which might well mean it would not be safe to proceed with the vast amount of basement construction currently proposed here.

**5) Excessive number and area of new large lightwells/private sunken patios replacing a large amount of garden soft landscaping.**

No less than 6 large new 'lightwells'/sunken patios are proposed in areas of the garden that were previously soft-landscaped - two are to the South, one to the South-West and one to the West of the extended main building and the final two are to the West of the 'relocated ' garage and the south of the most easterly part of the new house at the East end of the plot, with new basement underneath..

On the plans these are all (somewhat disingenuously) labelled as 'lightwells' whereas in fact two of them are easily accessible sunken patios, served by French Doors. As such there is a danger in the event of flooding, that if the edge of the sunken patio/lightwell is reached by raised flood water levels then the water will enter the new basement level through the French doors. There is no 'threshold' or 'freeboard' protection. This being the case, the affected basements should not contain any habitable rooms as per Camden's CPG Basements guidance for areas prone to flooding.

An excessive amount of the existing garden soft-landscaping is therefore being lost to newly-constructed hard-landscaped, concrete-floored sunken patio/lightwell structures. This area plus the area of the proposed new entrance pathway for the new 2-storey house, and the larger area of off-street parking hardstanding, all further reduce the 'greenfield run off' capacity of the garden, in tandem with further encroachment on the garden as a result of the larger built footprint of the new two-storey house and sunken patio, compared with the built footprint of the structures it is replacing.

**6) Intrusive, and out of character, external high metal staircases to the south of the raised ground floor flats providing garden access from the very 'raised' ground floor**

In this part of Goldhurst Terrace all the existing Victorian terraced and semi-detached houses have almost level-ground front entrances to the Ground Floor- with, at most, a single threshold step not exceeding 15-25cm. In full harmony with this, the main entrance to the existing main Victorian house on the subject site is also almost at level ground- the threshold is at most elevated by just 20-30cm above garden level, with just one or two steps in the approach path.

In stark contrast, and completely out of character with all houses in the locality, two enormous external cast-iron open tread external staircases with railings are proposed from two of the raised ground-floor flats - one in the original building (Flat 3 with ~6 external steps visible), and one in the new Eastward extension proposed to the main building (Flat 4 with ~10 external steps visible).

These large, very visually intrusive, new external cast iron staircases, topped by balconies with iron railings around their respective French doors are highly-visible from the front and street and yet completely out of character in this part of the Conservation Area. They should be removed from the plan, particularly as they do not in any case serve the main entrance into the respective flats, and would be rarely used. Moreover, they each obstruct the views from the basement lightwells and restrict light from reaching the basement flats below. Finally they would detract from the heritage and townscape value of the host building and would harm the character and appearance of the Conservation Area given the clear visibility they would have from the public realm on Goldhurst Terrace.

**7) Misalignment of levels between the host building and the proposed new 4-storey addition**

Misalignment of levels between the host building and the proposed new 4-storey addition to the east of it, leads to a very untidy misalignment of windows between the host building and the eastward extension, as seen from the South Elevation (public pavement).

Whilst alignment of the eaves-line and roof-line between the host building and the proposed new attached structure is, thankfully, achieved, lower down there is an increasing degree of misalignment at 1st floor, Ground floor and Basement levels.

This is presumably to allow Flat 1 (the only Flat that is entirely at the basement level) not to become too gloomy and provide some outside views that are not entirely of the miserable walls of a lightwell.

This gross misalignment of window-lines at the levels below 2nd floor, as well as the huge and prominent cast iron open-tread staircases from the substantially raised Ground floors down into the garden, are both visually intrusive and alien from all the harmonious surrounding properties in this part of the Conservation Area.

**8) Overlooking of 196 and 192 Goldhurst Terrace from many proposed new windows, leading to major loss of privacy**

Currently there are only 3 windows on the North side of the main building at 1st & 2nd floor level that overlook the house and garden at No. 196 Goldhurst Terrace. With the proposed 4-storey extension plus the remodelling of the host building there will be at least 9 windows facing north at 1st and 2nd floor level that will directly overlook No. 196.

In addition because of the seemingly very deliberate misalignment of levels between the host building and its easterly extension, as well as the raising of the level of the existing Ground Floor in the host building, it is highly likely that a further 3 windows at 'raised Ground Floor' level in the extension, will be high enough above the boundary wall to also overlook No. 196 Goldhurst Tce, giving a total of 12 overlooking windows, when currently there are only 3. This loss of privacy by a neighbouring property is wholly unacceptable.

On the East side of the plot, facing towards No. 192 Goldhurst Terrace there are currently 4 windows at 1st or 2nd floor level on the host building that overlook it. With the proposed 4-storey addition to the East end of the host building there will now be at least 6 overlooking windows facing East, and most probably a further 3, making 9 overlooking window in total (as a result of the elevation of the Ground Floor level into what is now a significantly higher 'raised Ground Floor' level). This loss of privacy by a neighbouring property is again wholly unacceptable.

**9) Conclusion- the site is being overdeveloped with excessive use of basement excavation so as to maximise the 'packing density' of units**.

Almost all of the concerns and objections described above could be easily alleviated/mitigated by a substantial reduction in the amount of basement excavation proposed.

It is clear that, by comparison with all existing Victorian buildings in the vicinity of this part of the Conservation Area, the site is being significantly overdeveloped - with excessive use of basement excavation at seemingly every opportunity, so as to maximise the 'packing density' of units, in a location that is in a flood risk zone and with potentially elevated levels of groundwater in parts of the site.

Instead there should be much less basement excavation with none under the existing main house or its eastward extension, and consequently either fewer flats (7, instead of 8), or the same number of flats but smaller on average (and with no ground floor/basement duplexes (Flats 2 and 3) and no basement-only flat (Flat 1)).

Importantly the quality and elegance/ambience of the flats on the current three levels would then be considerably enhanced as a result of retaining the generous, high ceilings of the existing host building over its 3 floors, which are characteristic of all the surrounding houses. Moreover there should be no flats that are entirely at basement level (ie. the proposed Flat 1), which breaches guidance in Camdens CPG for basements in areas with a risk of flooding or high groundwater.

This overdevelopment also leads to considerable visual disharmony because of:

1) the gross misalignment of levels between the host building and its eastward extension, at 1st floor level and the 2 levels below, which is very visible from the street, and destroys the otherwise harmonious appearance of the front elevations of all the houses along this part of the street.

2) because of the two excessively large/high cast iron open tread staircases that are proposed on the very visible south side leading into the garden as well as the 6 large 'lightwells/sunken patios' that remove valuable soft landscaping from the garden.

It is suggested that the main building and its side extension should both be restricted to the existing 3 floors, with no basement excavation, which would then allow all the windows across the southern elevation to be fully-aligned. It is further suggested that any basement excavation should be restricted only to the new detached house at the eastern end of the site, based around the relocated garage structure.

This would mean that the degree of material extraction would be approximately equivalent to that of a 'normal' detached or terraced house basement conversion in the vicinity (eg. at 190, 261 and 255 Goldhurst Terrace), rather than a hugely disruptive, three-times greater, volume of extraction within a single, constrained site, as is currently proposed.

Developer's profit must not be sought through over-development, at the expense of excessive and prolonged disruption neighbours and to ground-water flows in an already flood-prone area, leading to unknown and unpredictable changes to the groundwater flows that may well affect a number of existing structures over time.

**Absent a modest scaling back of the ambition of the number of additional flats (or their sizes) in this new development, by having much less overall basement excavation, the Application should be refused.**

References: Camden Planning Policy A5 'Basements'; CPG 4 Basements; Camden Strategic Flood Risk Assessment (SFRA) July 2014

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