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1.0 NON-TECHNICAL SUMMARY

- 1.1 CampbellReith was instructed by London Borough of Camden, (LBC) to carry out an audit on the Basement Impact Assessment submitted as part of the Planning Submission documentation for 25 Old Gloucester Street, London WC1N 3AF (planning reference 2023/4384/P). The basement is considered to fall within Category B as defined by the Terms of Reference.
- 1.2 The Audit reviewed the Basement Impact Assessment for potential impact on land stability and local ground and surface water conditions arising from basement development in accordance with LBC's policies and technical procedures.
- 1.3 CampbellReith was able to access LBC's Planning Portal on 26 January 2024 and gain access to the latest revision of submitted documentation and reviewed it against an agreed audit check list.
- 1.4 The BIA has been carried out by individuals who possess suitable qualifications.
- 1.5 The applicant's property is Grade II listed and the neighbouring property, St. George the Martyr is Grade II* listed. The site is located in Bloomsbury Conservation Area.
- 1.6 Screening and scoping assessments are presented and informed by desk study information.
- 1.7 A ground investigation was completed in March 2017 which confirm that the site is underlain by Made Ground over Lynch Hill Gravel, which is then underlain by London Clay. The BIA has confirmed that the proposed basement will be founded within Lynch Hill Gravel.
- 1.8 Monitoring of groundwater levels was undertaken as part of the ground investigation. Groundwater was encountered c. 1.00m below the base of the proposed excavation. It is accepted that the proposed development will not have a significant impact on the hydrogeology of the area.
- 1.9 The BIA confirms that the proposed basement will not increase runoff as the hardstanding area will not be increased. It is accepted that the proposed basement will not have a significant impact on the hydrology of the area.
- 1.10 Documents submitted after issue of the D1 audit confirm that all buildings neighbouring the extension area have existing basements that are a comparable depth to the proposed basement extension. It has been confirmed that no underpinning will be undertaken, therefore it is accepted that the development will not have a significant impact on land stability in the area.
- 1.11 A Ground Movement Assessment using PDisp and XDisp software was undertaken to calculate the short term and long term ground movements anticipated due to basement construction. The GMA is considered to be superseded by the additional document submission, which confirms that no underpinning will be undertaken.
- 1.12 Based on the additional documents submitted, which are presented in Appendix 3, it can be confirmed that the BIA complies with the requirements of CPG: Basements.



2.0 INTRODUCTION

- 2.1 CampbellReith was instructed by London Borough of Camden (LBC) on 22 January 2024 to carry out a Category B audit on the Basement Impact Assessment (BIA) submitted as part of the Planning Submission documentation for 25 Old Gloucester Street, WC1N 3AF and Planning Reference 2023/4384/P.
- 2.2 The audit was carried out in accordance with the Terms of Reference set by LBC. It reviewed the Basement Impact Assessment for potential impact on land stability and local ground and surface water conditions arising from basement development.
- 2.3 A BIA is required for all planning applications with basements in Camden in general accordance with policies and technical procedures contained within
 - Camden Local Plan 2017 Policy A5 Basements.
 - Camden Planning Guidance (CPG): Basements. January 2021.
 - Guidance for Subterranean Development (GSD). Issue 01. November 2010. Ove Arup & Partners.
- 2.4 The BIA should demonstrate that schemes:
 - a) maintain the structural stability of the building and neighbouring properties;
 - b) avoid adversely affecting drainage and run off or causing other damage to the water environment;
 - avoid cumulative impacts upon structural stability or the water environment in the local area;

and evaluate the impacts of the proposed basement considering the issues of hydrology, hydrogeology and land stability via the process described by the GSD and to make recommendations for the detailed design.

- 2.5 LBC's Audit Instruction described the planning proposal as "Extension of basement to accommodate additional cultural centre accommodation (use class F1 and F2), replacement of second floor at rear to accommodate offices (class E) and conversion of front part of building at second and third floor levels to create 2 x studio dwellings."
- 2.6 The Audit Instruction confirmed 25 Old Gloucester Street is a Grade II listed building and neighbour to Grade II* listed St. George the Martyr Church.
- 2.7 CampbellReith accessed LBC's Planning Portal on 26 January 2024 and gained access to the following relevant documents for audit purposes:
 - Basement Impact Assessment Report (BIA) by RM Design & Management Studios, Ref BIA (Document Number 23056BIA-2), dated 31/08/2023
 - Desk Study and Ground Investigation Report (DS & GI), by Geotechnical and Environmental Associates Ltd, ref. J17059, Issue No 4, dated 8 February 2021
 - Design & Access Statement (DAS), Ref mDandA, date: August 2023



- Construction/ Demolition Management Plan (CMP) by Caneparo Associates, Ref Draft CMP V1, date 27/09/2023
- Planning Application Drawings consisting of:
 - Location Plan by ATP Architects + Building Surveyors, Ref Site Location Plan 23165_PL2.000, date Oct 2023
 - Existing Plans:
 - Existing Basement Floor Plan, Ref 23165_PL0.001 Existing basement floor plan, date: August 2023
 - Existing Ground Floor Plan, Ref 23165_PL0.002 Existing ground floor plan, date:
 August 2023
 - Existing First Floor Plan, Ref 23165_PL0.003 Existing first floor plan, date: August 2023
 - Existing Second Floor Plan, Ref 23165_PL0.004 Existing second floor plan, date:
 August 2023
 - Existing Third Floor Plan, Ref 23165_PL0.005 Existing third floor and roof plans, date: August 2023
 - Existing North Elevation Plan, Ref 23165_PL0.006 Existing north elevation, date: August 2023
 - Existing South Elevation Plan, Ref 23165_PL0.007 Existing south elevation, date: August 2023
 - Existing West and East Elevation Plan, Ref 23165_PL0.008 Existing west and east elevations, date: August 2023
 - Existing Long Section, Ref 23165_PL0.009 Existing long section, date: August 2023
 - Existing Cross Section, Ref 23165_PL0.010 Existing cross section, date: August 2023

Demolition Plans:

- Existing and Demolition Plan 0, Ref Existing and Demolition-DEMO PL0.102
 PLAN 0, date: August 2023
- Existing and Demolition Plan 1, Ref Existing and Demolition-DEMO PL0.103 PLAN 1, date: August 2023
- Existing and Demolition Plan 2, Ref Existing and Demolition-DEMO PL0.104
 PLAN 2, date: August 2023
- Existing and Demolition Plan 3, Ref Existing and Demolition-DEMO PL0.105 PLAN 3, date August 2023



Existing and Demolition Plan – 1, Ref Existing and Demolition-DEMO PL0.101
 PLAN -1, date: August 2023

Proposed Plans:

- Proposed Basement Floor Plan, Ref 23165_PL2.001 Proposed basement floor plan, date: August 2023
- Proposed Ground Floor and Mezzanine Plans, Ref 23165_PL2.002 Proposed ground floor and mezzanine plans, date: August 2023
- Proposed First Floor Plan, Ref 23165_PL2.003 Proposed first floor plan, date:
 August 2023
- Proposed Second Floor Plan, Ref 23165_PL2.004 Proposed second floor plan, date: August 2023
- Proposed Third Floor Plan, Ref 23165_PL2.005 Proposed third floor plan, date:
 August 2023
- Proposed North Elevation, Ref 23165_PL2.006 Proposed north elevation, date:
 August 2023
- Proposed South Elevation, Ref 23165_PL2.007 Proposed south elevation, date:
 August 2023
- Proposed West and East Elevations, Ref 23165_PL2.008 Proposed west and east elevations, date: August 2023
- Proposed Section A-A, Ref 23165_PL2.009 Proposed section A-A, date: August 2023
- Proposed Section B-B, Ref 23165_PL2.010 Proposed section B-B, date: August 2023
- 2.8 The following additional documents were submitted to CampbellReith on 28 February 2024:
 - Letter from RM Design and Management Studios, Ref 23056 BIA Letter 230224, dated
 23 February 2024
 - Drawing Demonstrating Relative levels between 25 Old Gloucester Street and surrounding properties by RM Design and Management Studios, Ref 23056 014.
 - E-mail correspondence (presented in Appendix 3)



3.0 BASEMENT IMPACT ASSESSMENT AUDIT CHECK LIST

Item	Yes/No/NA	Comment	
Are BIA Author(s) credentials satisfactory?	Yes	See Section 1.3.2 in DS&GI.	
Is data required by Cl.233 of the GSD presented?	Yes		
Does the description of the proposed development include all aspects of temporary and permanent works which might impact upon geology, hydrogeology and hydrology?	Yes	See DS&GI.	
Are suitable plan/maps included?	Yes	See DS&GI and BIA Section 2.0.	
Do the plans/maps show the whole of the relevant area of study and do they show it in sufficient detail?	Yes	See "Envirocheck" Report appendix in DS&GI as well as in BIA.	
Land Stability Screening: Have appropriate data sources been consulted? Is justification provided for 'No' answers?	Yes	See section 3.1.2 Stability Screening Assessment in DS&GI.	
Hydrogeology Screening: Have appropriate data sources been consulted? Is justification provided for 'No' answers?	Yes	See section 3.1.1 Subterranean (groundwater) Screening Assessment in DS&GI.	
Hydrology Screening: Have appropriate data sources been consulted? Is justification provided for 'No' answers?	Yes	See section 3.1.3 Surface Flow and Flooding Screening Assessment in DS&GI.	
Is a conceptual model presented?	Yes	See section 7.0 Ground Model in DS&GI.	
Land Stability Scoping Provided? Is scoping consistent with screening outcome?	Yes	Section 4.0 Scoping and the additional documents submitted.	



Item	Yes/No/NA	Comment
Hydrogeology Scoping Provided? Is scoping consistent with screening outcome?	N/A	No questions on Hydrogeology brought forward from Screening.
Hydrology Scoping Provided? Is scoping consistent with screening outcome?	N/A	No questions on Hydrology brought forward from Screening.
Is factual ground investigation data provided?	Yes	See Appendix on Borehole records in DS&GI.
Is monitoring data presented?	Yes	See section 2.5 Hydrology and Hydrogeology.
Is the ground investigation informed by a desk study?	Yes	See section 1.3 Scope of Work and Appendix in DS&GI.
Has a site walkover been undertaken?	Yes	See section 1.3 Scope of Work. Date: 27/04/2017
Is the presence/absence of adjacent or nearby basements confirmed?	Yes	The additional documents submitted confirm that all neighbouring properties have existing basements that extend to a comparable depth to the proposed extension.
Is a geotechnical interpretation presented?	Yes	See Part 2: Design Basic Report and section 8.1.2 Basement Retaining Walls in DS&GI.
Does the geotechnical interpretation include information on retaining wall design?	Yes	See Part 2: Design Basic Report in DS&GI.
Are reports on other investigations required by screening and scoping presented?	N/A	None required.
Are the baseline conditions described, based on the GSD?	Yes	See section 9.1 Construction Sequence in DS&GI.



Item	Yes/No/NA	Comment
Do the base line conditions consider adjacent or nearby basements?	Yes	See section 9.1 Construction Sequence in DS&GI.
Is an Impact Assessment provided?	Yes	See section 11.0 in DS&GI and additional documents submitted.
Are estimates of ground movement and structural impact presented?	Yes	However these have been superseded by the additional documents submitted, which confirm no impact to land stability.
Is the Impact Assessment appropriate to the matters identified by screening and scoping?	Yes	
Has the need for mitigation been considered and are appropriate mitigation methods incorporated in the scheme?	Yes	It has been confirmed that no underpinning will be required.
Has the need for monitoring during construction been considered?	Yes	See section 10.2 Monitoring of Ground Movements.
Have the residual (after mitigation) impacts been clearly identified?	Yes	
Has the scheme demonstrated that the structural stability of the building and neighbouring properties and infrastructure will be maintained?	Yes	The additional documents provided confirm that no underpinning will be undertaken.
Has the scheme avoided adversely affecting drainage and run- off or causing other damage to the water environment?	Yes	
Has the scheme avoided cumulative impacts upon structural stability or the water environment in the local area?	Yes	



Item	Yes/No/NA	Comment
Does report state that damage to surrounding buildings will be no worse than Burland Category 1?	N/A	Additional documents submitted confirm there will be no impact to neighbouring properties due to the presence of existing basements in all adjacent buildings.
Are non-technical summaries provided?	Yes	



4.0 DISCUSSION

- 4.1 The Basement Impact Assessment (BIA) has been carried out by engineering consultants Geotechnical & Environmental Associates (GEA) and the individuals concerned in its production have suitable qualifications.
- 4.2 The LBC instruction to proceed with the audit identified that the basement proposal is a Grade II listed building and is adjacent to Grade II* listed St George the Martyr Church. The site sits within the Bloomsbury Conservation Area.
- 4.3 A document titled 'BIA' has been prepared by RM Design and Management Studio however it contains predominantly structural information, including a construction sequence, temporary propping details and structural monitoring proposals. Screening and Scoping information, informed by a desk study, and an impact assessment are all presented in the "Desk Study and Ground Investigation Report" (DS&GI) prepared by GEA.
- 4.4 The proposed development comprises extending the existing basement to the rear to occupy the full footprint of the site. It is also proposed to add a new storey to the building above the existing basement. The depth of the basement excavation is variably given as between 3.00m and 3.25m in both the BIA and DS&GI reports.
- 4.5 Following the D1 issue of the BIA Audit report, additional documents comprising a letter and drawing were provided to confirm that all the properties neighbouring the proposed development have existing basements that extend to a depth comparable to the proposed extension. As such, it has been confirmed that no underpinning will be required. The additional documents submitted are included in Appendix 3 of this report.
- 4.6 A ground investigation was undertaken by GEA in March 2017 and comprised 2 trial pits and 1 cable percussion borehole (BH1) from ground level, within the area to be excavated to extend the basement, and 1 trial pit and 2 windowless sample holes (BH2 and BH3) within the existing basement. Groundwater monitoring standpipes were installed in all three boreholes.
- 4.7 The site is underlain by Made Ground of varying thickness (0.90m below the existing basement floor and 3.00m below ground level (bgl). This is underlain by Lynch Hill Gravel to 6.50m bgl) followed by London Clay, which extends to the maximum investigation depth of 18.00m bgl.
- 4.8 Monitoring of groundwater levels was undertaken on one occasion and recorded groundwater at 4.50m bgl in BH1. The two installations in the basement were recorded as dry. The DS&GI report highlights that the groundwater was encountered c. 1.00m below the base of the proposed excavation. The DS&GI report recommends monitoring of groundwater levels continues for as long as possible to determine equilibrium level and seasonal variation. It is accepted that the proposed development will not have a significant impact on the hydrogeology of the area.



- 4.9 The DS&GI report states that localised perched groundwater may be encountered within the Made Ground during underpin construction. The report recommends the contractor have a contingency plan in place to deal with any water inflow from the Made Ground. The additional documents provided confirms the presence of existing basements on all sides of the proposed extension and that underpinning will not be undertaken.
- 4.10 The BIA states that the site is not located in area at risk of flooding from river or sea or surface water, which is confirmed by extracts of hydrogeological maps from Arup GSD and UK government flood-map-for-planning website. The site is situated in critical drainage area identified in Camden SFRA. The DS&GI report confirms that construction will not increase hard standing area as the site area is already fully developed, therefore there will be no increase in surface water run-off. It is accepted that the proposed basement will not have a significant impact on the hydrology of the area.
- Question 14 of the Land Stability Screening indicates that the site is not over or within the exclusion zone of any tunnels. It is noted that the location of the site is between Russel Square Underground Station to the north and Holborn Underground Station to the south, both of which are served by the Piccadilly Line of the London Underground. No additional consideration of the presence of London Underground tunnels below the site has been provided, however due to the presence of basements to comparable depths around the proposed development, it is accepted that the proposed excavation will not have a significant impact on any underlying tunnels. Additional assessment of the impact to the tunnels may be required by the asset owners.
- 4.12 Section 6.3.1 of the BIA document states that the ground conditions should be 'clay and stable'. The ground investigation identifies the Made Ground to be sand and gravel, which is unlikely to remain stable during excavation. Subsequent information has confirmed that no underpinning works will be undertaken.
- 4.13 A Ground Movement Assessment (GMA) in presented in the DS&GI report and has been undertaken using PDisp and XDisp software. This assessment is considered to be superseded by the additional documents provided, which confirm that the basement will not significantly increase the foundation depth relative to neighbouring properties and no underpinning will be undertaken. It is accepted that the development will not have a significant impact on land stability.
- 4.14 The additional documents submitted identify that party wall agreement works prior to construction are underway.



5.0 CONCLUSIONS

- 5.1 The BIA has been carried out by individuals who possess suitable qualifications.
- The applicant's property is Grade II listed and the neighbouring property, St. George the Martyr is Grade II* listed. The site is located in Bloomsbury Conservation Area.
- 5.3 The proposed development comprises extending the existing basement to the rear, to occupy the full footprint of the site.
- 5.4 Screening and scoping assessments are presented and informed by desk study information.
- 5.5 A ground investigation was completed in March 2017 which confirm that the site is underlain by Made Ground over Lynch Hill Gravel, which is then underlain by London Clay. The BIA has confirmed that the proposed basement will be founded within Lynch Hill Gravel.
- Monitoring of groundwater levels was undertaken as part of the ground investigation. Groundwater was encountered c. 1.00m below the base of the proposed excavation. It is accepted that the proposed development will not have a significant impact on the hydrogeology of the area.
- 5.7 The BIA confirms that the proposed basement will not increase runoff as the hardstanding area will not be increased. It is accepted that the proposed basement will not have a significant impact on the hydrology of the area.
- The additional document submission documents confirm that all buildings neighbouring the extension area have existing basements that are a comparable depth to the proposed basement extension. It has been confirmed that no underpinning will be undertaken, therefore it is accepted that the development will not have a significant impact on land stability in the area.
- 5.9 A Ground Movement Assessment using PDisp and XDisp software was undertaken to calculate the short term and long term ground movements anticipated due to basement construction. The GMA is considered to be superseded by the additional document submission, which confirms that no underpinning will be undertaken.
- 5.10 Based on the additional documents submitted, which are presented in Appendix 3, it can be confirmed that the BIA complies with the requirements of CPG: Basements.

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Appendix 1

Consultation Responses

None

F1 Appendix

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Appendix 2 **Audit Query Tracker**

F1 Appendix



Audit Query Tracker

Query No	Subject	Query	Status	Date closed out
1	BIA	Elevations should be added to the proposed basement drawings and the maximum excavation depth for the basement should be confirmed.		28/02/2024
2	Hydrogeology	Confirmation of the likelihood of encountering perched groundwater, the impact to excavation stability and mitigation measures should be presented.	Closed	28/02/2024
3	Land Stability	Further consideration of the presence of London Underground tunnels below the site may be required by the asset owners.	Note Only	
4	Land Stability	Confirmation of the form of the underpin section is requested along with outline retaining wall calculations.	Closed	28/02/2024
5	Land Stability	Temporary propping details should therefore be provided to show how stability will be maintained in the granular soil during underpinning.	Closed	28/02/2024
6	Land Stability	PDisp input data should be provided to confirm model geometry and loading. Clarification is requested regarding loading from the proposed addition of a fourth storey on host building.	Closed	28/02/2024
7	Land Stability	It should be confirmation that heave due to basement excavation has not been used to off-set vertical movements associated with underpin construction.	Closed	28/02/2024
8	Land Stability	Further consideration of the suitability of the ground movement curves used in the XDisp assessment is requested.	Closed	28/02/2024
9	Land Stability	The damage category assessment should be revisited to reflect any amendments made to the GMA.	Closed	28/02/2024
	Hydrogeology	The Desk Study and Ground Investigation report recommends monitoring of groundwater levels continues for as long as possible to determine equilibrium level and seasonal variation.	Note Only	

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Appendix 3

Supplementary Supporting Documents

BIA letter ref. 23056-RM Drawing ref. 23056-014 E-mail correspondence

F1 Appendix

Where innovation meets commercially minded structural engineering design

Telephone +44 203 553 2808 Email rm@rm-dms.co.uk www.rm-dms.co.uk

Thursday, 23 February 2024

Reference: 23056-RM

Camden Council
Planning Department
5 Pancras Square
London
N1C 4AG

For the attention: Brendan Versluys

Dear Sir

REGARDING: 25 OLD GLOUCESTER STREET APPLICATIONS - 2023/4299/P AND 2023/4902/L &

2023/4901/L & 2023/4384/P

I have been forwarded you email of Wednesday, February 21, 2024 with regard the queries associated with our Basement Impact Assessments with regard the above mentioned property and applications. I am writing as following the submission of these documents we have as part of our Party wall agreement works been able to gain access to the properties around the location of the area at basement level.

Following an inspection on the 25th January 2024 we can confirm all the properties around the proposed excavation have basements to a similar depth as the proposal. To this extent the proposal put forward for planning consent will only see the ground between the other basements being removed. To this extent I do not consider this action as the formation of a basement in the true sense of the word but more a unifying of all the subterranean areas within the locality of the proposal.

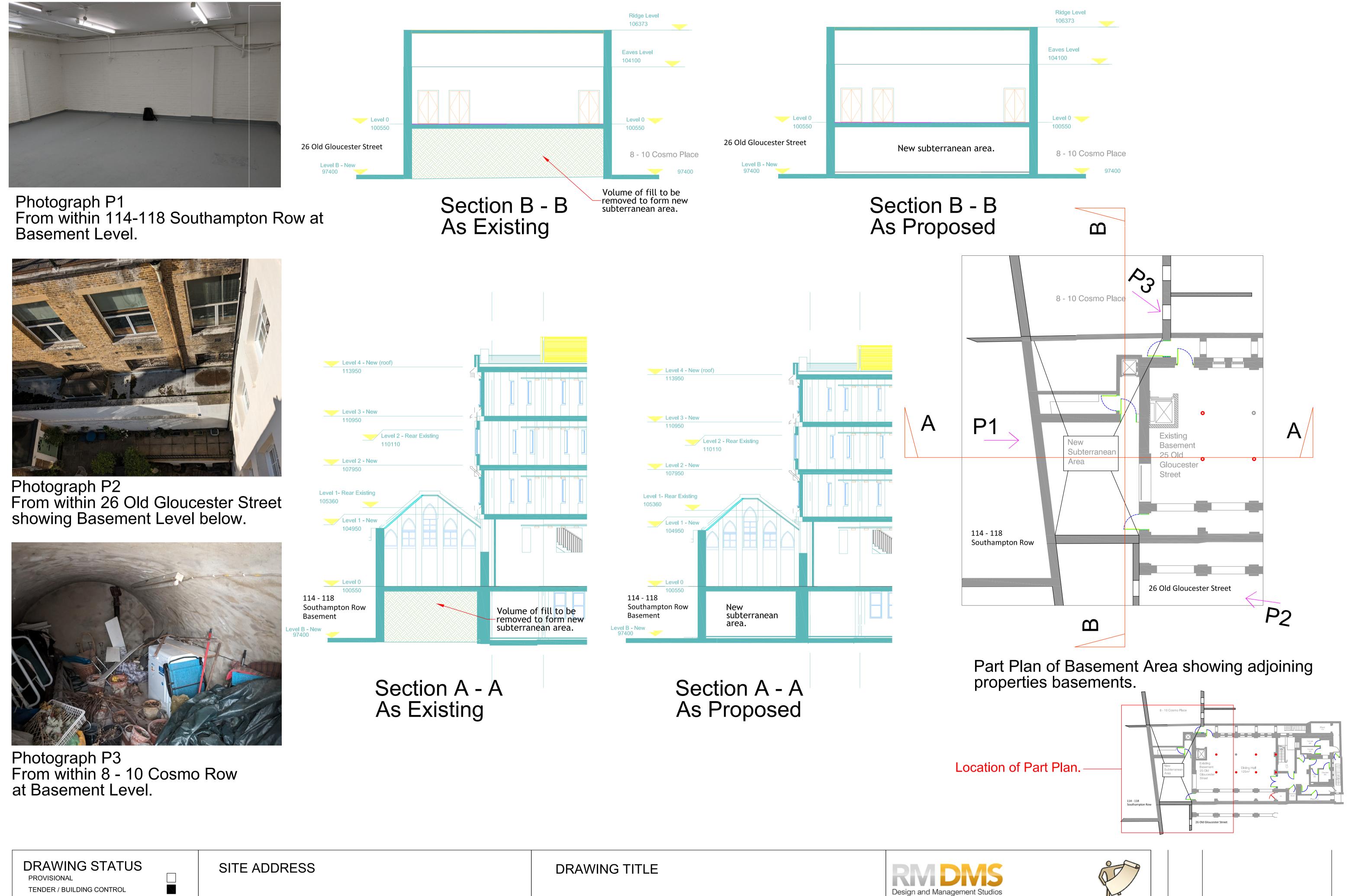
To demonstrate the above, we have prepared the attached drawing 23056-014 which includes photographs from within the adjoining basements and sections showing no temporary works will be necessary nor the formation of any retaining structures will be necessary. I would therefore propose that a Basement Impact assessment is no longer required for the scheme.

I trust the above explanation adequate however should you require further assistance please do not hesitate to contact the undersigned.

Yours faithfully

Richard Millar

I Eng AMI Struct Eroprietor and Engineer



PARTY WALL AWARD CONSTRUCTION CHECKED AND APPROVED

Bap Cultural Centre 25 Old Gloucester Street, WC1N

Drawing Demonstrating Relative levels between 25 Old Gloucester Street and surrounding properties..

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REV DATE REVISION DESCRIPTION JOB / DRAWING NUMBER

23056-014 -



Katharine Barker

From: rm@rm-dms.co.uk
Sent: 28 February 2024 16:24

To: 'Mark Pender'; Brendan Versluys

Cc: 'Dhirajsingh Taur'; 'William Board'; 'David Ledger'

Subject: RE: 25 Old Gloucester Street Applications - 2023/4299/P and 2023/4902/L &

2023/4901/L & 2023/4384/P

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Mark

The basement will not significantly increase the depth relative to the neighbouring properties and as we see the situation now there will be no requirement for underpinning.

Kind Regards

Richard

Richard Millar

I Eng AMI Struct E

Proprietor and Structural Engineer



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