Objection to Planning Application 2023/5375/P – 253 Goldhurst Terrace

I object to this further proposed excavation of a substantial 78 sq. m area basement in a locality that already has at least 5 other existing substantial basement excavations within a 50m radius of the subject site, without adequate due diligence having been performed in the BIA. All the other nearby basement excavations have been constructed within the last 15 years or so. The Basement Impact Assessment (BIA) document does not even recognise/identify these 5 other very nearby and large existing basement developments and certainly makes no attempt to analyse their cumulative/aggregate effects on groundwater levels and flows in the area.

More generally the BIA is less than thorough and exhaustive in its assessment of actual very heavy rainfall/flood events over the last 50 years; it does not recognise or admit to raised ground water issues in the close vicinity, and seems to rely on groundwater measurements done by others at least 40+ years ago and at least 100m- 200m away from the subject site. These very old and distant boreholes can in no way be taken as indicative of the true groundwater situation now, some 40 years later when extreme rainfall events are more common, and far more basements have since been excavated in the local area.

Details of these very concerning shortcomings in the BIA are covered below but do clearly indicate the need for a very rigorous BIA Audit by the expert auditors that Camden uses, and for all points of omission to be rectified in a fully-revised BIA before it can be considered fit for serious consideration in providing supporting evidence for this planning application.

Even more worryingly the owners of the large site of No. 194 Goldhurst Terrace, just across the road from the subject site, are themselves now requesting in a current planning application (2024/0012/P) a total volume of new basement excavation approximately equivalent to more than twice what has already been excavated next door to the subject site at 251 Goldhurst Terrace, and more than 3 times the volume of what is currently being excavated at No. 190 Goldhurst Terrace –both less than 40m away from 194 Goldhurst Terrace.

Gross over-development of basement excavations in this very small area- Camden needs to impose a moratorium to allow review of cumulative impact and to limit density of basement excavations in a flood-prone area

This gross over-development of basement excavations within such a small area, suggests that It is now time for Camden to impose a moratorium on any further basement developments - certainly in this part of Goldhurst Terrace and perhaps more widely in the South Hampstead Conservation Area, which is widely acknowledged as being at risk of flooding, and has indeed been flooded several times.

The well-known propensity to flooding in this area is clearly evidenced by Camden themselves currently committing to spend some £180k+ on an expensive set of rain-gardens/new trees at the top-end of, and upper section of, Goldhurst Terrace – stated to be primarily as a mitigation against excess surface water flows during heavy rainstorms. If Camden admits, by its very actions in introducing these measures, that expensive mitigation is needed against flooding in this area (at public expense), how can it possibly continue, at the same time, to be fully complicit in allowing the over-development by private individuals of excessive numbers of basements in the vicinity, that simply exacerbate the propensity to flooding by increasing hard-landscaping and surface water run-off and – even more importantly- by unpredictably disturbing groundwater flows?

Camden urgently need to use this moratorium period to analyse whether further constraints are needed in Camden Planning Guidance (CPG4) and Policy A5 (Basements) to limit the total number of basement conversions within a given small area- say within a 60m radius of one another.

Inadequate plans that do not show Sections AA and BB

There are insufficient plans and sections provided to determine the true scale and location/form of the proposed basement excavations. The documentation is difficult to read and inadequate in detail and appears to be originally in Italian. The only 'Plan' document (labelled as 05_PROPOSED PLANS - REV A - Revised) does not even show where Sections AA and BB are taken (that are shown on the document labelled as

07_PROPOSED.pdf - Sections) . It is almost as if the applicant does not wish to divulge the true extent and volume of the proposed basement excavation.

I also support all the observations and objections recently made by CRASH as regards other aspects of this application.

Details of shortcomings and omissions in the Basement Impact Assessment that require more preparatory work to be done before fully-informed consideration of this planning application can be undertaken.

The BIA has significant shortcomings and does not appear to be fit for purpose. It appears to demonstrate a complacency and gives no evidence of a detailed site-specific investigation having been done. This makes it insufficiently thorough and rigorous as a basis on which to determine whether yet another major basement excavation in an acknowledged flood-prone area is either safe for the subject premises, or will not cause yet more unpredictable ground-water changes that will adversely affect other nearby properties and gardens.

The intensity and number of extreme rainfall events are steadily increasing as a result of global warming, and flood events in the vicinity are becoming more frequent. The BIA has not even listed the 4 most recent local flooding events, and nor has it identified and listed any of the nearest extant/in progress/planned basement excavations listed.

For the record, the 4 most recent very high rainfall/flooding events in the area were in 1975, 2002 and two separate events in July 2021. All of these need to be listed and the extent of flooding caused by each of these needs to be investigated if the BIA is to be made fit for purpose.

Also, and for the record, nearby recent existing basement excavations include those at: 190, 251, 255, 261 and 219 Goldhurst Terrace (with a planning application currently live for a further and enormous basement excavation at 194 Goldhurst Tce.). All of these, and more, need to be identified, listed, and their impacts assessed, if the current BIA is to be made fit for purpose.

As a simple and very recent example, the total amounts of rainfall over just the last 3-4 months in the South-East has resulted in elevated groundwater levels in very many area. In no way can the actual groundwater levels at the front and back of the subject site be accurately determined without actual boreholes now being drilled and monitored over an entire year. To rely on 40+ year old boreholes drilled by another party at a distance of some 100-200m from the subject site shows a blatant disregard for the present-day realities of the rainfall/groundwater situation and, arguably, verges on negligence.

As a minimum, at least 2 new boreholes need to be drilled and then monitored at the subject site over the course of a full year before the BIA can make confident assertions that the development and nearby dwellings/gardens will not be at risk form flooding/raised groundwater levels. itselfPlanning Application can be adequately assessed.

The current BIA simply evades its responsibilities in this regard by asserting that:

(Extract from Page 5 of the BIA):

'Historic boreholes within the vicinity of the site were consulted in order to determine groundwater levels within the vicinity of the site. The location of these boreholes can be found in figure 3 below, and the results of boreholes can be found in Appendix B. The results of these historic boreholes show that no groundwater was encountered, and the Groundwater vulnerability MAGIC maps from DEFRA shown overleaf, also show the site to be in an area of unproductive strata, with a soluble rock risk.'

Evidence produced in the many comments and objections recently lodged as a result of the still-current Planning Application 2024/0012/P at 194 Goldhurst Terrace (less than 30m from the subject site) for example shows the following nearby examples of flooding and/or elevated groundwater levels:

- In the 1975 severe rainfall event a nearby basement at 62 Priory Rd (only about 80m from the subject site) was flooded.

- the original basement/cellar of No. 196 Goldhurst Terrace regularly floods during periods of heavy rain (only about 40m from the subject site).

- The rear gardens of both 261 and 263 Goldhurst Terrace are regularly flooded and/or waterlogged (only about 30m from the subject site).

It is noteworthy that the equally flawed BIA for the 194 Goldhurst Terrace planning application (2024/0012/P), did not itself even undertake the drilling and extended monitoring of groundwater levels in their own new boreholes, but instead simply relied on the boreholes that had been drilled at 190 Goldhurst Terrace.

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 this over-complacent BIA. There is also no flood risk assessment document. 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. As already observed, the BIA does not even list one other basement developments within 100m of the subject site. It is highly 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. Why is Camden's SFRA document being ignored in a BIA being undertaken in a flood-prone area?

As a reminder, Camden Policy A5 (Basements) states that '*the Council will only permit basement*

development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

a) neighbouring properties;

b) the structural, ground, or water conditions of the area;

c) the character and amenity of the area;

d) the architectural character of the building; and

e) the significance of heritage assets'.

Conclusion

In conclusion, this BIA is wholly inadequate in providing supporting evidence that a further basement excavation at the subject site will not potentially cause harm to the subject property in terms of groundwater levels or cause harm to other nearby properties and their gardens. Therefore it does not meet the burden of proof and evidence required by Camden Policy A5.

As such the current application should be rejected until a more thorough and exhaustive BIA has been undertaken which also provides on-site evidence taken over a whole year that groundwater levels are well below the level of the proposed new floor of the basement extension.

E.Peel