**GAIL WALDMAN**

**48 CROMWELL AVENUE**

**LONDON N6 5HL**

 29 April 2024

Edward Hodgson

 Planning Dept.

 Camden Council

By email only

Dear Edward,

2024/0012/P: 194 Goldhurst Terrace

I see that additional documentation was placed online about two weeks ago regarding the Flood Risk Assessment and a revised BIA.

I have the following comments:

1. BIA
	1. My first email regarding this application pointed out that the root protection areas of trees on neighbours’ land needed to be shown. This information has still not been provided.
	2. There is no mention that 196 Goldhurst Terrace has a cellar.
		1. There seems to be a strong possibility that the Party Wall etc. Act would not apply to 196 and so the Council cannot simply rely on providing an advisory note in relation to the Act. Lorna and Ralph Darlington at 196 must have absolute assurance that any damage to their property would
2. not exceed Category 1 cracks on the Burland Scale; and
3. be put back in good structural and decorative order
	1. On page 22 the Flood Risk response states:

 “*As this is just for planning stage, the applicant has not undertaken any long-term ground watering monitoring.”*

It goes on to state:

“*It should be noted that the ground water levels will be well below the basement level…*”

and categorically states:

“*No monitoring is proposed prior to the planning application being considered*”

It is assumed, probably rashly, that there will be no change in water flows affecting neighbours. The conclusion on page 42 makes no mention of the effect on neighbouring properties or ground water flows being diverted.

I have pointed out previously that this approach is not acceptable and monitoring must be carried out now as part of the current BIA assessment. It seems highly unlikely that the ground water is currently at a depth of 10m. Camden surely requires this information; Campbell Reith called for it; and it must be provided before a Decision is made on the application.

1. Revised BIA and Appendices Rev. 2
	1. The tracker at the end of Campbell Reith’s document did not for some reason include all the points on which further information was required in the main body of their report, for example:

paras. 4.8, 4.10. 4.19 and 4.22, including the potential risk to, presumably, the party garden wall between 194 and 196 and not to 196 itself though clarification on this point is needed.

Para 1.1.8 presumably applies to neighbouring properties and concedes that structural monitoring is to be set up in the structural specification. It goes on to say in para 1.1.9 that the Basement Impact Assessment has assessed …… impacts of the proposed development on neighbouring structures and damage would not exceed Category 1 damage of the Burland Scale. Para 1.1.10 states the BIA has demonstrated that the proposal would not cause harm to neighbouring properties; and to the structural, ground or water conditions. Where is the evidence to support these statements?

I note on the Thames Water Assets’ Locations map that there is a pink dot shown in the pavement outside 196 Goldhurst Terrace which indicates: “*Content of this drainage network is currently unknown*”. It would seem essential to establish the location of all Thames Water assets generally.

The ‘Tree Constraints Plan’ does not include root protection areas of neighbouring trees.

Taking all the above concerns together I consider it is essential that Campbell Reith is commissioned to review the information recently presented by the applicant.

Kind regards,

Gail Waldman

cc. Ralston Darlington; Lorna & Ralph Darlington