

FLAT 1, 28 CANFIELD GARDENS, London, NW6 3LA

Statement:

- Design and Access
- Planning
- Heritage
- Basement Impact
- Flood Risk

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- (i) and (ii) Para. 5.12 of the FRA describes a total post development impermeable reduction of 32m2. 23
- (iii) The proposals are not classed 'major development'. _____ 23
- (iv) The development includes a Sustainable Drainage System (cellular attenuation tanks – see FRA para. 5.6). _____ 23
- (v) FRA paras. 5.24 to 5.31 for details of adoption and maintenance. A planning condition can be applied to require that the systems are installed, as described, and thereafter maintained. _____ 23
- (vi) A Surface Water Drainage Strategy is included in the FRA. _____ 23

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1 Introduction

1.1 Introduction

1.1.1 This Statement is submitted in support of a full planning for the development of No. 28 Canfield Gardens ('the application property').

1.1.2 The Statement combines four topics:

- Planning Statement.
- Design and Access Statement.
- Heritage Statement.
- Basement Impact Update – incorporating various update statements/clarifications
- Flood Risk -linking to the submitted chapters on flooding and drainage in the Basement Impact Assessment (BIA) and Flood Risk Assessment (FRA).

1.1.3 Proposed development

1.1.4 The proposal is for the enlargement of existing flat at ground and lower ground level.

1.1.5 The development is limited to the existing footprint and the existing ground and basement levels. The only external alterations comprise the formation a front lightwell and alterations to exiting rear light wells.

2 Planning Statement

2.1 Planning History

2.1.1 A lawful development certificate was granted The application relates to the use of the second and third floor of the property as five self-contained flats numbered as Flats 3, 4, 5, 6 and 7. Flats 1 and 2 exist on the ground and first floor of the property, respectively (Reference 2013/4572/P).

2.1.2 An application for full planning permission for the enlargement of existing basement level, including front and rear lightwells was submitted In February-2017 and later withdrawn by the Council (Reference 2017/0859/P).

2.2 Application materials-reports and other supporting information

2.2.1 The following supporting documents are submitted.

- Existing and proposed plans, sections, and elevations.
- Application form.
- Ownership form.
- CIL Form.
- Supporting Statement (this document) incorporating planning, design and access heritage and flood risk statements.
- Fire (reasonable exception) Statement.
- Trees/ Arboricultural Appraisal.
- Basement Impact Assessment- a suite of documents, updated and clarifications.
- Flood Risk Assessment and Surface Water Drainage Strategy.
- Construction Management Plan (using revised LBC pro forma).
- Site photographs.

2.3 Planning history

- 2.3.1 *In 2001 permission was refused to convert the property into a single dwelling house (ref.: PWX0103933 & PWX0103934).*
- 2.3.2 *In 2004 permission was granted for the installation of two dormer windows on the rear slope of the roof. (ref.: 2004/1792/P).*
- 2.3.3 *And permission was granted IN 2004 for the installation of 2 roof lights to front roof slope. (ref.: 2004/3785/P).*

2.4 Policy

National Planning Policy 2021 (NPPF)

- 2.4.1 The National Planning Policy Framework (NPPF) sets out the Government's overarching planning policies and how these should be applied.

Delivering a wide choice of quality homes

- 2.4.2 Regarding housing, the NPPF aims to boost the supply of housing significantly. In that respect, housing applications should be considered and developed without unnecessary delay, as set out in paragraph 60.

Achieving well-designed places

- 2.4.3 Paragraph 126 states that good design is a key aspect of sustainable development, creating better places to live and work and helping make development more acceptable to communities.
- 2.4.4 Paragraph 130 notes that planning policies and decisions should ensure that developments are visually attractive as a result of good architecture and should be sympathetic to local character and history.
- 2.4.5 Paragraph 134 notes that significant weight should be given to the development of outstanding or innovative design, which helps raise the standard of design more generally in an area so long as they fit in with the overall form and layout of their surroundings.

London Plan (2021)

- 2.4.6 The London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The plan covers: transport, environment, economic development, housing, culture, and health.

GG4 Delivering the Homes Londoners needs.

- 2.4.7 Supports the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable to create mixed and inclusive communities, with good quality homes that meet high design standards and provide for identified needs, including specialist housing.

D4 Delivering Good Design

- 2.4.8 This suggests how developments should be of a good design and how they are monitored. Policy D4 also states that Design and Access statements must be submitted with applications.

Policy D5 Inclusive Design

- 2.4.9 This states that a development proposal should achieve the highest standards of accessible and inclusive design. They should consider London's diverse population.

Policy D6 Housing Quality and Standards

- 2.4.10 This states, 'housing development should be of high-quality design and provide adequately sized rooms'. It says that proposals must ensure 'sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context'.

Policy T6 Car parking

- 2.4.11 This states, 'car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity'.

Policy HC1 Heritage and conservation

- 2.4.12 States that development proposals affecting heritage assets and their settings should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings.

Camden Local Plan 2017

Housing

- 2.4.13 Policy H3 is designed to safeguard all housing floorspace utilized for long-term residential purposes, including self-contained flats. The current proposal aligns with this policy, aiming to retain extend and enhance an existing self-contained flat.
- 2.4.14 Policy H6 focuses on achieving a diverse housing mix that caters to the specific requirements of individuals with mobility challenges, wheelchair users, service families, and those interested in constructing their own homes. The proposed extension will transform the apartment and provide higher quality accommodation, contributing to Camden's housing objectives by offering more versatile accommodation to meet a broader spectrum of needs.
- 2.4.15 Under H6(a), there is an emphasis on designing housing that provides functional, adaptable, and accessible spaces. The proposal significantly improves upon the existing flat in this regard, delivering a more functional, adaptable, and accessible living space. The current flat will be replaced by a larger, well-designed, and adequately insulated residence built to modern energy efficiency standards.
- 2.4.16 H6(b) mandates compliance with nationally described and London Mayor's space standards for all new-build and converted self-contained homes. Recognizing the challenges posed by the conversion of existing structures, the Council has committed to applying the space standard flexibly. The proposed extension will meet these benchmarks.
- 2.4.17 Policy H7 addresses the size of homes (number of bedrooms) required for various household compositions (large and small families with children, single people, couples, and other types of households). The proposal replaces a very small flat and poorly laid out flat with a four-bedroom family-sized apartment.
- 2.4.18 The explanatory text to Policy H7 (Para. 3.169) emphasises the significance of improving the quality of accommodation in the private rented sector. The proposal aligns with this objective, contributing to the enhancement of private rented accommodation by

providing a more suitable and better-designed living space and supporting the Council's work to improve the quality of accommodation in the private rented sector.

2.5 **Biodiversity Net gain**

- 2.5.1 The proposed development will impact less than 25 square metres (5m by 5m) of on-site habitat and does not impact a priority habitat.
- 2.5.2 The development therefore falls below the threshold and therefore qualifies for an exemption.

3 Design and Access

3.1 Design

3.1.1 The Design and Access Statement sets out the design rationale for the scheme. It explains how the proposals will provide high-quality urban design and architecture and conserve and take opportunities to enhance the area's special qualities.

3.2 Basement

3.2.1 There is an established pattern of basements along the terraces.

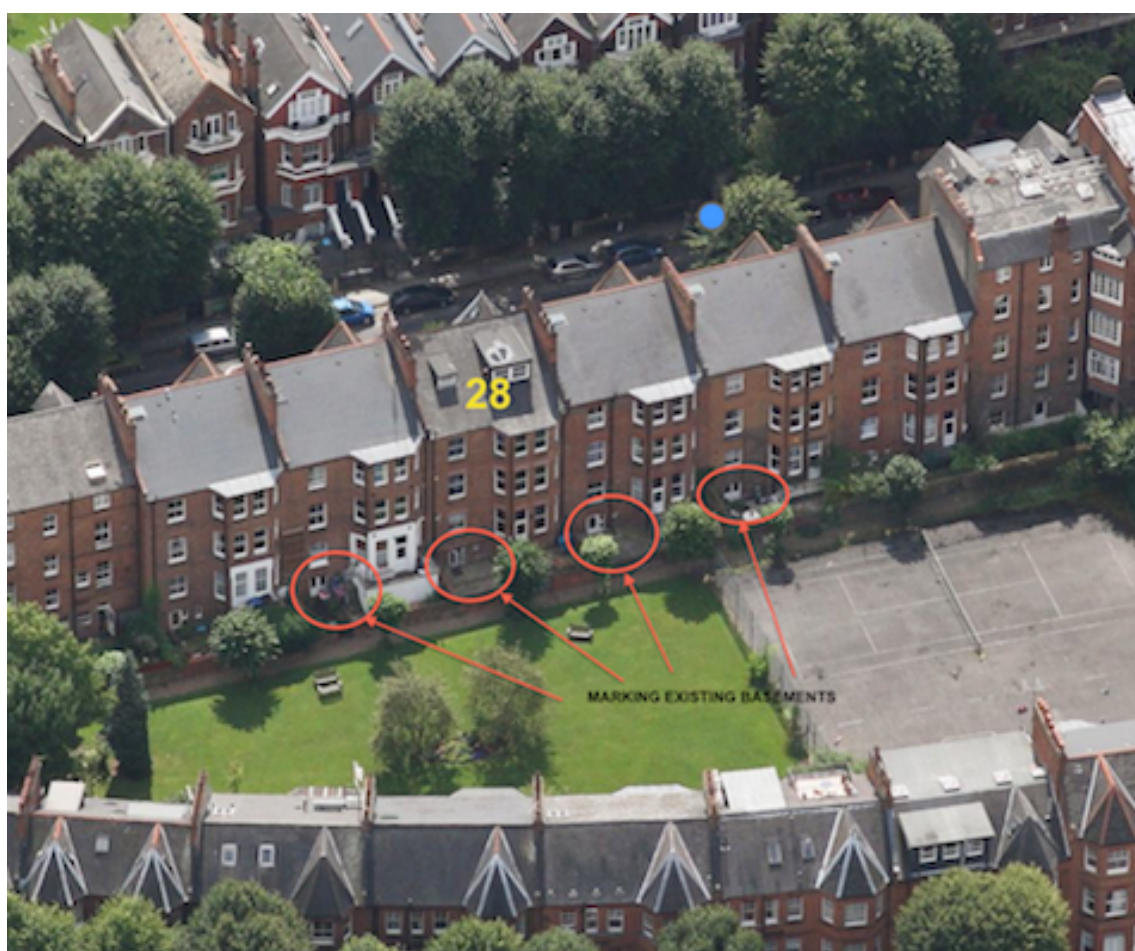


Figure 1 Aerial photograph of the Application Property from the rear showing the positions of basements in adjacent properties.

3.3 Design approach.

3.3.1 The proposed excavation is in a small scale due to the fact that the buildings in this terrace row were built originally with half a basement.

3.3.2 This application seeking to enlarge the exiting basement level, which will then provide sufficient space for the growing needs of a family and will improve on the circulation within the exiting flat.

Materials

3.3.3 The materials chosen for the front bay window are to match the hosting building and to blend with the surrounding thus reducing its visual impact. The proposed light wells will not be visible and would be covered with security grill at ground level.

Host building.

3.3.4 The works should be considered to preserve the character and appearance of the host building.

Light wells

3.3.5 The proposed light wells will not be out of character in this part of the conservation area (there are many basements along Canfield Garden and on the neighbouring streets), and its minimal impact on the street scene is in line with CA Policy and its consistent implementation by the LPA.

3.4 Scheme Revisions

3.4.1 The submitted scheme was revised in January 2020 incorporating the following enhancements:

- The total amount of basement floorspace was reduced, reducing the amount of basement excavation overall.
- The outline of front light well was adjusted with faceted corners that follow the profile of the canted bay above.
- The rear light well has been reduced in width.
- A toilet and washbasin have been provided at ground floor entrance level in accordance with London Plan Housing Quality Standards.
- The ground and basement floors are now each arranged on one level with no additional stairs. In order to improve accessibility.

- The staircase from ground to lower ground has been designed with passive provision for a future stairlift to meet Lifetime Homes standard.

3.5 Access

3.5.1 No alterations are proposed to the means of access. There is no vehicular access.

Pedestrian access is via a front pathway from the street.

4 Basement Impact Assessment

4.1.1 The BIA as originally submitted has been subjected to two rounds of revision/updates.

4.2 First Audit - Revision: D1 July 2017

4.2.1 The First response of the Auditor is attached. This indicated six 'open items.

Query No	Subject	Query	Status/Response	Date closed out
1	Hydrology	Site within flood risk zone.	Open - Assessment required with appropriate mitigation proposed.	
2	Hydrology	Impermeable site area, drainage and flood mitigation to be assessed.	Open - Increase in surface water flow to be assessed. Mitigation measures to be proposed including SUDS assessment. Lightwell anti-flood measures to be proposed.	
3	Stability	Services search to be undertaken.	Open - Impacts to be assessed, if applicable.	
4	Stability	Indicative temporary works scheme required for lightwell retaining walls.	Open - Sequencing and propping to be outlined. Contingencies for encountering softer Alluvium should be considered.	
5	Stability	Establish levels of adjoining basements.	Open - To confirm assessments.	
6	BIA	Conceptual Site Model	Open - CSM should indicate the existing and proposed development foundation levels in the context of ground / groundwater conditions and neighbouring structures, highlighting potential risks and impacts.	

4.3 Applicant's response: January 2020

Revised BIA Revised report (December 2019)

4.3.1 The BIA Report was revised and updated to take account of the additional information requested by the auditor (flood risk; services search; drainage strategy etc.).

Flood Risk Assessment and Sustainable Drainage Strategy

4.3.2 A Flood Risk Assessment was completed by Sandersons Associates (October 2019). This concluded that the site can be developed without increasing flood risk to the site itself and other sites in the vicinity with the implementation of suitable mitigation measures.

4.3.3 The areas of hard paving across the front and rear gardens have been replaced with permeable surfaces. A raised lip has been introduced around the proposed front and rear light wells. Please refer to Proposed Cross section B-B.

Utilities

4.3.4 A utilities services search has been undertaken and a 'Groundwise' Desk Top Utility Report prepared in October 2019. The revised BIA Report (December 2019) discusses the results in the light of the BIA findings as a whole.

- 4.3.5 The revised BIA confirms a full statutory service search has been completed as part of this investigation and it is confirmed that no utilities will be affected by the proposed development.

Temporary works

- 4.3.6 The auditor requested details of the indicative temporary works scheme for lightwell retaining walls and further details of sequencing and propping.
- 4.3.7 Details of revised Typical Sequence of Underpinning Propping Rev. A (Martin Redston Associates Revision A 15/11/2019) was submitted giving additional details of temporary works for the front and rear light wells. Please also refer to Foundation Plan and Details (Martin Reston Associates Revision B 15/11/2019).

Alluvium, perched groundwater etc.

- 4.3.8 Section 7.2 of the revised BIA report finds that, due to the small size of the historic ditch in the vicinity, any possible flooding that may have occurred is unlikely to have caused anything but very thin layers of Alluvium, but is unlikely to extend as far as No. 28. As such, the report concludes, there is no influence on site. Nevertheless, the revised BIA recommends that contingencies for encountering softer Alluvium (which is very unlikely as proven in the site investigation) should be considered.
- 4.3.9 The ground investigation established a variable depth of Made Ground, below which lies London Clay in which the basement will be founded. The auditor states that Perched groundwater may be encountered in the Made Ground and contingency measures should therefore be considered.
- 4.3.10 Additional precautionary measures to be undertaken by the the contractor were outlined in the form of a contingency plan to deal with any groundwater inflows including:
- The installed standpipe to continue to be monitored in order to determine the equilibrium level and the extent of any seasonal variations.

- After the contractor has undertaken further monitoring and prior to the start of excavation, a sump-pumping system will be specified, and a suitable discharge location identified for that water.
- If for any reason water is found in the excavation percolating from within the made ground or Clay layers, the ground will be carefully assessed, and the sump-pumping scheme installed to carry the water away from the excavation.
- Where ground water inflows are encountered shoring of the excavation will be implemented in accordance with normal safe construction practice.

Adjoining basements

- 4.3.11 The presence, extent and levels of adjoining basements have been determined by reference to planning records and historic drainage plans. These indicate that the neighbouring properties have basement layouts similar to the existing basement at No. 28.

Conceptual Site Model (CSM)

- 4.3.12 The revised and updated section 7 of the BIA report and appendices incorporates the Ground Movement Assessment (appended to the revised BIA report) updated January 2020.
- 4.3.13 The revised conceptual Site Model takes account of all new attached information and as detailed in the revised BIA report.
- 4.3.14 Based on these predicted ground movements, the properties surrounding the site are not expected to suffer any damage greater than CIRIA C580 Damage Category 1 (Very Slight). (Section 4.7.2 - Results)

Trees

- 4.3.15 The earlier submission omitted reference to a front garden tree. An Arboricultural assessment and method statement was submitted in order to assess any impact of the proposed works on the tree and vice versa.

4.3.16 The revised BIA report confirms that no trees are to be felled as part of the development. An arboricultural impact report confirms that no basement development will intrude upon root protection areas.

4.4 Second Audit Revision: D2 February 2020

4.4.1 The second Audit indicated two remaining 'open items'.

Audit Query Tracker

Query No	Subject	Query	Status	Date closed out
1	Hydrology	Site within flood risk zone.	Open – Assessment provided, however authors' qualification to be stated and should be as per requirements of CPG, as 4.3.	
2	Hydrology	Impermeable site area, drainage and flood mitigation to be assessed.	Closed, pending presentation of FRA author qualifications.	February 2020
3	Stability	Services search to be undertaken.	Closed – Survey provided.	February 2020
4	Stability	Indicative temporary works scheme required for lightwell retaining walls.	Closed– Sequencing and propping outlined. Contingencies for encountering softer Alluvium provided.	February 2020
5	Stability	Establish levels of adjoining basements.	Closed – Presence confirmed.	February 2020
6	BIA	Conceptual Site Model	Closed – CSM updated.	February 2020
7	Stability	Ground Movement Assessment	Open - To be reviewed / revised as 4.8 to 4.11	

4.5 Response

Qualification of FRA Author

4.5.1 FRA authors' qualifications are provided on the inside cover of the revised FRA.

Further clarification is sought, as the predicted settlements appear to be in excess of the values adopted for the assessment.

4.5.2 An updated Ground Movement Assessment (GMA) dated March 2020 is submitted.

5 Heritage

5.1 Significance

5.1.1 The application property is located within the South Hampstead Conservation Area (Formerly known as Swiss Cottage Conservation Area), a Designated Heritage Asset. The property is considered to make a positive contribution to the conservation area. There are no listed buildings or any other type of designated heritage asset in the vicinity.

5.2 The need for assessment

5.2.1 Camden guidance confirms that a heritage statement is required for works affecting the setting of a conservation area.

5.3 Policy and guidance

5.3.1 Camden Local Plan 2017 policy D2 Heritage.

5.3.2 The South Hampstead Conservation Area Character Appraisal And Management Strategy was published in February 2011.

5.4 Application property

5.4.1 The application property forms the middle of a long terrace of similar three storey plus basement mansion blocks on the north side of Canfield Gardens.

5.4.2 The front elevation is of brick with rubber brick window mouldings and stringcourses. Windows are white painted timber box sash in a 'six over two' arrangement. Most windows have segmental arches in brick with round/ovoid window arches to the ground floor front bay. A front ground floor window to the right-hand side has a flat brick arch with keystone.

5.4.3 The main entrance has a painted stone triangular pediment with glazed timber door and glazed side and top lights. The roof is of slate with red clay ridge tiles. The terminal finial to the apex roof above the bay has been lost.

5.4.4 The status of the building as a 'positive contributor' is set at an appropriate level considering its architectural merit and historic interest.

5.5 Proposed works

- 5.5.1 The proposed external works are largely confined to the basement and rear of the property. The impact upon the host building, its setting and the wider conservation area is therefore negligible.
- 5.5.2 The only relevant alteration will be the formation of a front light well. This will be covered by a grille with the lower ground floor level elevation (facing into the light well) designed to match the details and materials of the existing building above.
- 5.5.3 The planting of hedges around the perimeter of the lightwell and at the front boundary will largely occlude views of the lightwell and grille.
- 5.5.4 The outline of the lightwell has been amended so that it follows the line of the canted bay window above, which is considered more appropriate.
- 5.5.5 Front lightwells are an established feature of properties in Canfield Gardens - including a number that have only recently been approved.
- 5.5.6 The large and deep front garden will retain its open aspect.

5.6 Impact

- 5.6.1 Front lightwells are an established feature of Canfield Gardens and the wider conservation area and cannot therefore be said to be an alien or inappropriate form of development.
- 5.6.2 The proposed lightwell, by virtue of its sympathetic design and materials, will not harm the character or appearance of the host building or its setting.
- 5.6.3 The area of the proposed lightwell is small in relation to the large front garden area.
- 5.6.4 The reconfiguration of unsightly bin stores and removal of hard-paved surfaces will enhance the garden setting.
- 5.6.5 The mature front garden tree (a Silver Birch) will be retained.

5.7 **Conclusions**

- 5.7.1 The proposals will not cause any harm or loss of significance of the designated heritage asset (the conservation area).

6 Flood Risk

Need for Assessment

- 6.1.1 The proposed scheme is not a Major development and comprises the alteration and extension of an existing flatted dwelling that already includes a basement/lower ground floor. Planning policies and standards for new-build development do not therefore normally apply.
- 6.1.2 The application property is in Flood Zone 1. The existing residential use is classed as more vulnerable. In accordance with Table 3 (PPG 2014, Planning Practice Guidance 2014) a 'More Vulnerable' development located in Flood Zone 1 is an appropriate development, therefore the full Sequential or Exception Test would not be required as part of a planning application for this development.
- 6.1.3 Basement development is proposed and the scheme therefore falls to be assessed against Camden BIA guidance (CPG3). A screening exercise highlighted that the property was within 50m of a historic water course- a tributary of the Ravensbourne: Although even preliminary assessment indicated that the river had long since been culverted (see utilities search information submitted). Notwithstanding, the BIA methodology required a Flood Risk Assessment (FRA), which was commissioned to address Camden's BIA guidance (see 7.3 of the submitted BIA).
- 6.1.4 The submitted FRA should be read as a companion to the wider BIA.

6.2 Local Plan

Local Policy CC3 'Water & Flooding'

A. The Council will seek to ensure that development addresses and reduces flood risk to mitigate the impact of flooding on Camden's communities, both now and in the future. The Council will:

(i) Require applicants to use the borough's Strategic Flood Risk Assessment to identify whether their site is at risk of flooding from any source. Certain developments are exempted from this, and these are set out in the supporting text below.

(ii) Require site specific flood risk assessments to be submitted for:

- 1. All sites of 1 hectare or greater;*
- 2. All applications where flood risk has been identified in accordance with criteria (i); and*

3. *All basement development, where flood risk has been identified in accordance with criteria (i).*

(iii) Expect Flood Risk Assessments (FRA) to be prepared in accordance with the guidance set out in the Council's Strategic Flood Risk Assessment and demonstrate how a development has been designed to be resilient to flooding and set out how the risk of flooding will be mitigated over the lifetime of the development, without increasing flood risk elsewhere. Recommendations in the FRA will be secured by planning condition.

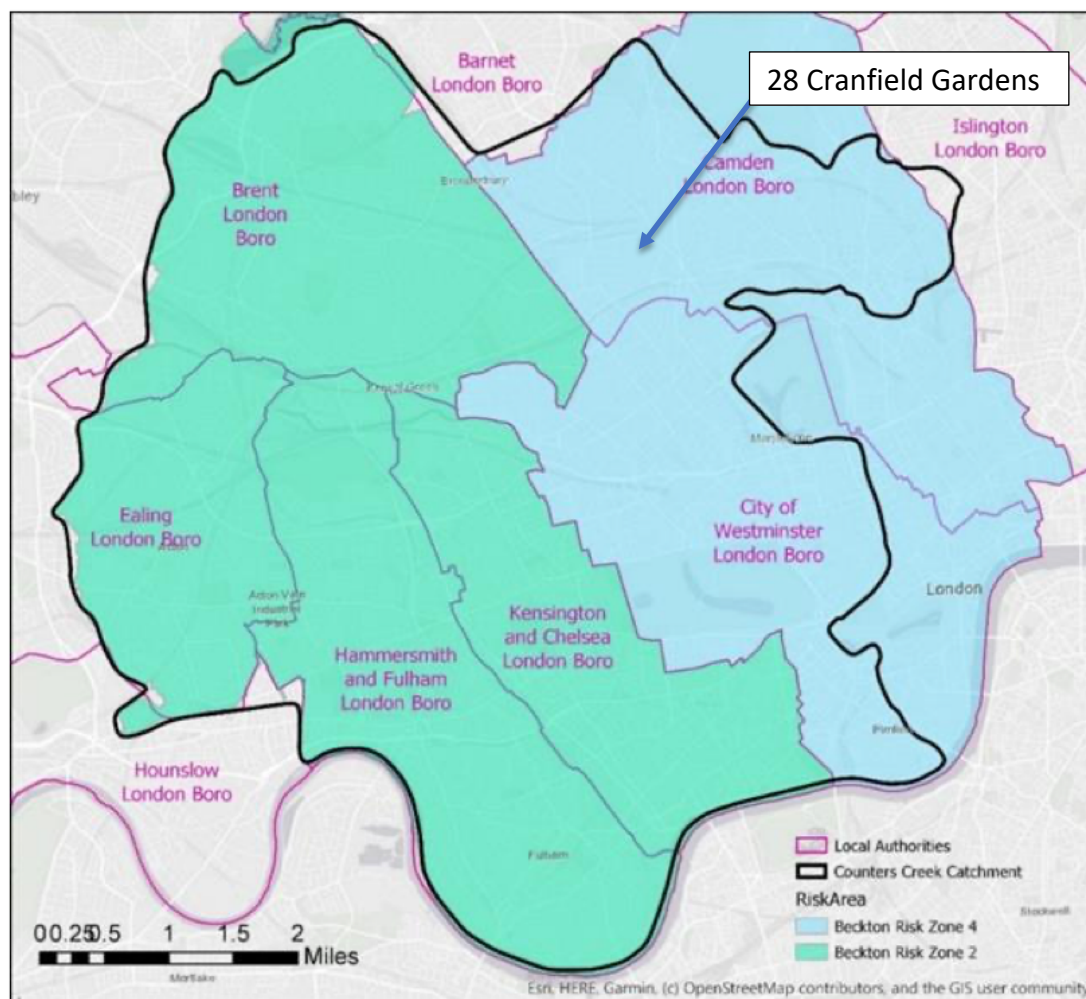
(iv) Require all new, or basement, development located within the Counters Creek catchment area to limit sewer discharge rates.

(v) Support the retrofitting of flood resilience and flood resistance measures to properties that have previously experienced flooding or are at risk of flooding.

6.2.1 The proposals and supporting information comply with Local Plan Policy CC3 as follows:

- (i) The Borough's Strategic Flood Risk Assessment has been used to identify whether the site is at risk of flooding from any source. Please refer to FRA paras. 4.6 (pluvial); 4.12, 7.15 and Figure 10 (groundwater); and 4.16, 7.16 and Figure 11 (sewers).
- (ii) A site-specific flood risk assessment has been prepared.
- (iii) The FRA has been prepared in accordance with the guidance set out in the Council's Strategic Flood Risk Assessment.
- (iv) The site is not located within the Counters Creek catchment area. The FRA includes a Surface Water Drainage Strategy (Chapter 5) and completed Surface Water Drainage Pro-forma.
- (v) The proposals incorporate flood resilience and flood resistance measures detailed in section 6.3 of the FRA and to be controlled by a proposed condition (see attached plan 'Drainage Strategy' that is also included at page 28 of the FRA and the outline 'Flood Plan' is detailed at para. 6.11 of the FRA.

Figure 1: Counters Creek area (black boundary)



Local Plan Policy CC12 - Sustainable drainage

A. The Council will seek to control surface water run-off from development to reduce the risk of flooding. The Council will:

(i) Require all development to include permeable surfaces, incorporate green and blue roofs, and seek to replace non-permeable surfaces where feasible. This should be documented within the Sustainability Statement, or Drainage report if required.

(ii) Resist proposals including impermeable surfacing unless it can be demonstrated to the Council's satisfaction that this is unavoidable.

(iii) Require all major development to reduce surface water run off rates to greenfield run-off rates, through the application of Sustainable Drainage Systems, following the drainage hierarchy in the London Plan.

(iv) Require Sustainable Drainage Systems to be designed to provide multi- functional benefits and be integrated into the development.

(v) Expect sustainable drainage system proposals to meet national and local guidance to ensure they are adequately designed, built and maintained for the lifetime of development.

(vi) Require a drainage report to be submitted with all major applications. A drainage report for basement developments and other vulnerable development (as set out in Annex 3 NPPF) is to be submitted in areas identified at risk of flooding (Policy CC11).

6.2.2 The proposals accord with Local Plan Policy CC12 as follows:

- (i) and (ii) Para. 5.12 of the FRA describes a total post development impermeable reduction of 32m².
- (iii) The proposals are not classed 'major development'.
- (iv) The development includes a Sustainable Drainage System (cellular attenuation tanks – see FRA para. 5.6).
- (v) FRA paras. 5.24 to 5.31 for details of adoption and maintenance. A planning condition can be applied to require that the systems are installed, as described, and thereafter maintained.
- (vi) A Surface Water Drainage Strategy is included in the FRA.



Figure 2. Photograph of the rear windows to the existing basement.