

## **Name and address supplied separately**

Dear LB Camden Planning Department

### **Re: Planning Application 2024/2928/P**

Further to my online comment dated 16/08/2024, I am writing to strongly object to the planning application for 30 Grove Place, NW3 1JR.

Having lived on Grove Place for over two decades, I whole-heartedly agree with the objections of other residents that these works will significantly and negatively impact the local environment, community and infrastructure.

First, however, I would like to say how disappointed I am in the consultation process thus far. From the online documents, it is clear that the applicants have been planning their basement project since early 2022 and yet made no attempt to approach their neighbours regarding the matter for over two years. When they did finally notify us of their intended application, in mid-June 2024, it was via an impersonal bulk mail-drop in the communal hallways of 1-8, 9-16, 17-24 and 25-28 Grove Place inviting residents to request a copy of the Construction Management Plan (CMP) via email – with Sequoia strictly gate-keeping access to the document. I also note that a copy of the letter has been removed from the communal noticeboard. To my mind, this does not bode well for a construction site that will be considerate to neighbours in any way whatsoever. I also base this assessment on the applicants' current (business?) use of one of the housing units in 9-16 whereby they have been inconsiderate with respect to pre-07:00 am visits and deliveries to the block.

I would also like to highlight the built-in unfairness of the planning process with the applicants having spent some 28 months and tens-of-thousands of pounds on professional advisors and consultants to prepare their planning application versus local residents having only a few weeks and no legal/professional support – and little to no experience of the planning process – to make our objections. As mentioned by other objection letters, we have elderly and housebound residents on the Grove Place and Christchurch Hill estate, some without access to email/internet, and no effort has been made by the applicants to engage these or any other vulnerable residents on the matter.

In addition, I would emphasise the fact that paragraph 316 on page 11 of the applicants' Planning Design, Access & Heritage Statement is inaccurate when it states the author of the CMP consulted with the Grove Place and Christchurch Hill Tenants and Residents Association (GPCHTRA) as the organisation was disbanded in 2017 prior to the applicants purchasing their two Grove Place properties.

For myself, I have been at a complete loss as to how to begin to convey my dismay and distress at hearing about these proposed works hence this delayed objection letter. I honestly do not know how I will continue to live and work (full-time) in my home with no respite from construction noise and vibration, dust, traffic, and general inconvenience for a minimum of ten months.

### Traffic, Access and Safety

Unquestionably, the proposed demolition, excavation and construction works will result in significant noise, construction traffic, and dirt/dust, which will impact negatively on both the immediate and surrounding area. Grove Place itself is a short and extremely narrow one-way street lined with 32 densely packed households, at least 28 of which have their bedroom windows directly facing onto the roadway. It mainly houses low-income social housing tenants, a number of which work from home (including myself) and others who do shift-work in local hospitals and supermarkets. One elderly resident in particular is bedbound with carers visiting several times a day and the positioning of a skip/rubble-truck in a suspended parking bay directly under their bedroom window is, quite frankly, abhorrent verging on inhumane – be it for a few days, a few months or nigh-on a year.

Grove Place is situated in close proximity to a number of primary schools and nurseries (both state and private) at the centre of a delicately balanced one-way traffic management system. The applicants' documents currently include a table covering some 43 weeks and 837 construction vehicles as outlined in a simplified version below. This is likely to be a conservative estimate at best both in terms of build duration and vehicle numbers. Whatever the levels of increased vehicular traffic, the inevitable effect will be hugely negative for the health and safety of residents, school children, pedestrians and other road users, as a result of increased congestion, pollution levels and traffic/road hazards.

Works	Duration	No of Vehicles Per Week	Total No of Vehicles
Site Set-up & Enabling	4 weeks	15	60
Excavation	12 weeks	10	120
Construction & Slab	10 weeks	20 (+4 for slab work)	204
Construction & Fit Out	14 weeks	30	420
Site Clearance, etc	3 weeks	11	33
<b>Total:</b>	<b>43 weeks</b>		<b>837 vehicles</b>

Indeed, I believe that the small size and narrowness of Grove Place renders it wholly unsuitable for the declared frequency and size of construction vehicles and presents an unacceptably high risk of damage to residents' parked cars, kerb-side buildings, and mature trees in addition to injury to pedestrians, cyclists, pets and wildlife. I understand the Council itself highlighted the "*fine urban grain and tight constraints of the site and surrounding streets*" and it is my view that the disruption, disturbance and detriment that these proposed works will cause to residents and road users can not be overstated.

I would also add that I am vehemently opposed to the demolition and replacement of the existing ground-floor kitchen area. Paragraphs 3.23 and 3.24 of the applicants' Planning Design, Access & Heritage Statement argue that this will "*provide some temporary onsite space to accommodate construction management with regards to basement excavations and storage of materials*" and "*assist with the construction activities*". They claim that a new-build replacement will improve the "*overall sustainability of the house*".

I counter that this simply adds to the duration, complexity, noise and pollution of the works without bringing any significant positive benefit. If the applicants seek only to improve the efficiency of the insulation then why not retrofit/upgrade the existing structure with modern insulating materials? Instead they are seeking to demolish a functioning kitchen (a substantial portion of the home's footprint) and use it as some form of construction thoroughfare and storage area for a short period of time. I view this as unnecessary and excessive but, moreover, detrimental to all concerned, including the fabric of the existing building, neighbouring residents, traffic flow, and pedestrian access and safety – especially that of children trying to get to and from school.

In the event that the Council approves the applicants' plan to demolish the existing kitchen area then I would ask that excavation spoil and material be stored in that area by means of a skip or other appropriate container/vehicle rather than in a suspended parking bay on Grove Place to reduce disruption and disturbance to the 28 households resident in the flats.

Please note that with respect to traffic, parking and damage to road surfaces, I agree with Mrs Lesley Stevas' objection letter in its entirety and unreservedly support her assertion that **the application should be refused**. I do not accept that all drivers will voluntarily "*switch off engines when on stand on the site at any time*" or that they will refrain from waiting on the highway to enter Grove Place/the site. Again, in the event that the Council approves these building works, I would ask that a named supervisor be visibly present on-site at all times to ensure compliance and minimise traffic noise, pollution, disruption and congestion.

I would further ask that the Council prohibits the applicants from carrying out any building works at weekends (including Saturday mornings and Bank Holidays) and that works during the week (i.e., Monday to Friday) do not fall outside the hours of 09:30 to 17:00 to reduce disruption to residents and to manage local access roads and highways (which are already highly congested with commuters and school traffic).

## Trees, Wildlife and Environment

Grove Place is a pleasantly verdant thoroughfare, lined with a number of mature lime trees. We have recently suffered the loss of one beloved tree at the southern end of the road whilst, at the northern end (where Grove Place meets Christchurch Hill), three hawthorn trees have been damaged in recent months and appear to be dead. I am aware that other residents have witnessed builders discharge cement washings or similar at the base of these trees and I myself have seen white paint spilled, or deliberately disposed of, in close proximity to trees on Grove Place (during the course of refurbishment works at large private houses along Christchurch Hill). I have also seen building material and debris from private households dumped next to the Grove Place/Christchurch Hill estate bins. This is unsightly, hazardous and often creates a noise disturbance. The applicants already use these bins for household waste from 30 Grove Place so I believe there is a high risk their construction work will result in the same behaviour from their building contractors. This must be strictly prohibited.

As others have stated in their objection letters, I believe the proposed works will result in further damage to the mature trees along Grove Place, negatively impacting the ecosystems they support. Already, delivery vehicles (for example, supermarket and courier vans) brush against overhanging leaves and branches causing them to snap and break off, especially when parking and reversing – which often happens as the street is so narrow and many commercial vehicle drivers prefer to reverse out of it. It is therefore inevitable that the frequent daily construction vehicles listed in the applicants' documentation will do the same, and, I believe, far worse.

The possible loss of one or more of these mature trees should not be countenanced; it would be hugely detrimental to residents, air quality, shade and temperature, the aesthetics of the neighbourhood, and wildlife habitats. I have personally observed several bird species on Grove Place, heard owls, and regularly observe foxes. I have also witnessed bats at dusk to the rear of the estate. I strongly believe that the scale and duration of the proposed building works places an unacceptable burden on the flora and fauna of the road itself and the surrounding conservation area.

I note that the applicants have already submitted an Arboricultural Impact Assessment (dated July 2024), however, its author, Andrew Belson, only inspected two trees on Grove Place, one lime and one cockspur thorn. I feel this is insufficient given the damage caused to other trees in the vicinity and would therefore like all eight trees individually surveyed and included in a Tree Preservation Order. Notably, Mr Belson's report itself confirms the risk posed by the applicants' construction plans and recommends "*in order to avoid accidental damage, a suitable tree protection scheme must be implemented before development begins*".

I suggest this risk is unacceptable and **the application should be rejected in full**. In the event that the applicants plans are approved then I would ask that Belson's Method Statement for Tree Management and Protection be extended to cover all eight trees on Grove Place and not just the NT1 Lime and NT2 Cockspur Thorn identified on the accompanying diagram.

## Flood Risk, Subsidence and Structural Stability

I recognise the twin facts that: (1) the applicants have submitted extensive and expensive flood risk and basement impact assessments; and (2) that neither myself nor my fellow social housing residents possess relevant expertise in these matters and/or the financial resources to obtain independent professional reports of our own.

In my view, however, it is notable that the applicants' Flood Risk Assessment (FRA) states, in paragraph 6.1 on page 29, that "*It has been written to support a planning application*". It then goes on to summarise the flood risk as low across four separate categories with recommendations for sewer non-return valves, SuDS features and basement tanking. The FRA concludes the risk is acceptable; it does not state there is zero or negligible risk. Indeed, it contains a fairly all-encompassing disclaimer on its second page and thus, I would argue, its findings cannot be relied upon in any capacity.

And so – given the horrendous flash floods that occurred in South End Green in recent years (and in West Hampstead before that) in addition to the various sink holes/road collapses that appear from time to time in the local area and also the on-going difficulties Grove Place flats experience with damp, drains and guttering – I would counter that the proposed basement excavation represents an increased flood risk, is thus unacceptable, and **the application should therefore be rejected in full.**

I note that another objection letter states the following: *“The steep incline of the area introduces additional risks that cannot be overlooked. Excavating a basement in such a location could lead to soil instability and subsidence, potentially endangering the structural integrity of neighbouring properties. The potential for damage to surrounding homes is a significant concern, especially considering the regular incidences of road collapse potentially due to other basement projects in the area”*. I am unable to articulate this better and fully concur with the view that the applicants’ proposed basement excavation presents a structural risk to neighbouring properties.

On page 37 of the Geotechnical Interpretative Report for Hydrogeology and Land Stability commissioned and paid for by the applicants, Julian Maund calculates that there will be “Category 1 (slight damage)” to adjacent properties; he does not assert (or guarantee) there will be zero or negligible damage. Throughout the document, Mr Maund utilises assumptions (pages 13, 14, 30, 31, and 36), calculations (pages 1, 2, 14, 30, 32, 34 and 37) and models (pages 2, 11, 12, 15, 16 25, 29, 30) to formulate his conclusions. Whilst I do not have the technical expertise to analyse and critique the report, I know enough about hypotheses, statistics and modelling to be aware that results are highly dependent on the methodologies and variables used. As someone who has been living on Grove Place for over two decades and visiting the area for in excess of three, I believe the basement poses a Damage Category of 3 or more (see page 32) to neighbouring structures and also a risk of damage to the roadway itself. Regardless of the number and the methodology used to conjure it, any risk of damage is unacceptable and **the application should therefore be rejected in full.**

#### Aesthetics of the Front Elevation

To my mind, it is a shame that the entire site, from 55 Christchurch Hill to 29, 30 and 31 Grove Place, has not been listed as yet as (notwithstanding some insensitive historic development) it remains a delightfully pretty example of a late-Victorian hall in the heart of Hampstead village, a conservation area beloved by residents and visitors alike. The current residents of the hall are extremely privileged to have temporary custodianship of the 130-year-old building with an emphasis on the word ‘temporary’. It is the Council’s duty to preserve the aesthetic appeal and character of the building as a whole and prevent excessive, unnecessary and ugly development of any of its constituent parts.

I would therefore like to include my objection to the insertion of a velux-type rooflight in the front street-facing elevation of number 30 Grove Place. I disagree with the Council’s pre-application view that the proposed rooflight would not *“have any harmful impact on neighbouring amenity”*. The property currently features three street-facing windows, which are entirely out-of-keeping with the style and date of the building, due to an earlier insensitive development of the site. The windows are modern, elongated and incongruent, entirely unsympathetic to the period style of the Victorian hall and the neighbouring buildings. A fourth modern velux-style window inserted into the roof tiles would deface the building further, introduce additional light pollution into the narrow street, and spoil the view from the residential properties directly opposite. It may also cause a loss of privacy to the residents opposite and to the applicants themselves. I maintain that it would indeed have a harmful impact on neighbouring amenity and would ask that **this aspect of the application also be rejected.**

#### Impact on Local Services and Infrastructure

Again, as per another resident’s objection letter, I agree that the proposed basement excavation and proposed kitchen demolition and reconstruction will have a negative impact on local infrastructure including road access, traffic flow, resident parking, utilities, and waste management services. As highlighted above,

the number of construction vehicles attempting to access a narrow one-way street several times a day over a period of ten months (and likely longer) in conjunction with the tightly confines of the construction site and the surrounding roads, will be disruptive, chaotic and a nuisance to existing residents. The increased traffic will result in road blockages, closures, delays, damage and possibly accidents, all of which could have an impact on emergency services and waste collection.

In conclusion, for all the reasons above and in full agreement with all additional objections from fellow residents, I unreservedly object to the planning application put forward by the owners of 30 Grove Place, Hampstead NW3 1JR. The Council previously refused application PWX0203110 (in 2003) in relation to the property and did not support PWX102079 (in 2001) which involved relatively minor works as compared to the current application to demolish and rebuild an entire ground-floor room and excavate a 57-square-metre basement, the latter adding a second living room, a small 11-square-metre gym and a tiny fourth bathroom to the existing four-bedroom three-bathroom property. The disruption and disturbance the building works will cause is out of all proportion to the gains being sought and **I therefore ask that the Council reject the application in full.**