

<b>Application No:</b>	<b>Consultees Name:</b>	<b>Received:</b>	<b>Comment:</b>	<b>Response:</b>
2024/5203/P	Alexander Smaga	28/12/2024 20:26:34	OBJ	

Dear Planning Officer,

I am writing on behalf of the Heath and Hampstead Society Planning Subcommittee to formally object to the planning application PA20245203P for a basement extension at 31 Willoughby Road NW3 1RT. Despite ongoing objections and previous refusals, this new application raises significant concerns that have not been adequately addressed.

**Key Objections:**

1) **Structural Damage:** As highlighted by Dr. Phil Smith of GCG, the proposed basement extension poses a substantial risk of damage to the Willow Cottages, both immediately and over time due to displaced settlement patterns.

2) **Noise and Vibration:** The construction process, estimated to last at least 12 months, will cause significant noise and vibration, severely disrupting daily life.

3) **Impact on Recently Repaired Properties:** Neighbours with recently repaired homes may face prolonged and minimal compensation for damages, even with legislative safeguards.

**Disruption from Construction Traffic:** The removal of basement spoils via trucks and skips will cause considerable disruption in the neighbourhood.

4) **Flooding Risk:** There is an existing flood risk at the site, which is likely to worsen due to climate change and extreme weather events. The GOV.UK website highlights that surface water flooding, also known as flash flooding, occurs when heavy rain cannot drain away. The proposed basement will replace soil, some of which is above the normal groundwater level, with an impermeable structure. This reduces the soil's capacity to absorb rainwater, diminishing natural drainage of surface runoff. If the groundwater is near the level of the path, there will be minimal gradient to promote flow, causing groundwater to follow its natural course to the east. The full-width basement will block this flow, acting as a dam, and leading to a rise in groundwater level behind it. This increased groundwater level could flow through the retaining wall into the rear passageway to Willow Cottages, increasing the flood risk for these properties.

**Additional Concerns:**

After visiting the site and inspecting the retaining wall, we observed that the planned excavation poses a significant risk and could potentially impact the listed retaining wall at the rear of Willow Cottages. The wall appears to be in a very precarious condition and looks like it already needs rebuilding. As Dr Phil Smith from GCG notes, the additional hydraulic load on the retaining wall could destabilise it, causing significant structural damage.

The new application shows a smaller basement footprint yet fails to address the proximity to heritage assets, particularly the Grade II listed Willow Cottages and the listed retaining wall.

Lack of detailed dimensions in the plans concerning the basement depth and its impact on the water table and underground water flow.

The proposed basement rooms lack natural light and ventilation, raising concerns about their habitability and the potential need for air-conditioning units, which conflict with local climate policies.

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Dr. Phil Smith's expert assessment clearly demonstrates that the proposed basement extension remains flawed and does not mitigate the reasons for the previous application's refusal. Furthermore, the application contradicts the Government's National Planning Policy Framework (NPPF) Section 16, particularly regarding the conservation and enhancement of the historic environment.

Given these unresolved issues and the potential damage to heritage assets without public benefit, I strongly urge the refusal of this application.

Thank you for your consideration.

Yours sincerely,  
Alexander Smaga RIBA ARB  
Co-Chairman of the Planning Subcommittee  
The Heath and Hampstead Society

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2024/5203/P	Felicia Olney	22/12/2024 13:39:52	OBJ	<p>I am objecting on the following grounds:</p> <p>Inadequate mitigation of previous refusal reasons</p> <p>The current application does not sufficiently address the reasons for refusal of the previous application, 2020/0927/P. Despite a reduction in basement size, the proposal still poses unacceptable risks to surface water flood and potential harm to adjacent heritage assets, particularly Willow Cottages.</p> <p>Impact on heritage assets</p> <p>The proposed basement development threatens to cause harm to nearby listed buildings and structures, specifically Willow Cottages and its retaining wall. This is contrary to: NPPF Section 16, which emphasizes the conservation and enhancement of the historic environment Camden Local Plan 2017 Policies A5 (Basements) and D2 (Heritage) Hampstead Neighbourhood Plan 2018 Policy BA2 The application fails to demonstrate how it would “conserve and enhance the significance of heritage assets and their settings” as required by these policies.</p> <p>Flood risk and drainage issues</p> <p>The Basement Impact Assessment (BIA) does not adequately address the potential increase in flood risk: The proposed basement may act as a dam to natural groundwater flow, potentially increasing flood risk to Willow Cottages The assessment of flood risk is insufficient, lacking a comprehensive Flood Risk Assessment (FRA) as per national guidance. This contravenes Camden Local Plan Policies A5 (Basements) and CC3 (Water and Flooding)</p> <p>Structural concerns</p> <p>The BIA fails to properly account for the existing poor condition of the retaining wall behind Willow Cottages. The cumulative effect of additional strain on this already distressed structure has not been adequately assessed.</p> <p>Design and sustainability issues</p> <p>The basement layout raises concerns about habitability and sustainability as rooms lack natural light and ventilation.</p> <p>Public benefit</p> <p>The proposal offers no discernible public benefit to outweigh the potential harm to heritage assets, as required by NPPF Section 16.</p> <p>In conclusion, this application fails to address the previous reasons for refusal and continues to pose unacceptable risks to heritage assets and local hydrology. It contravenes multiple local and national planning</p>

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2024/5203/P	Hilary King	21/12/2024 17:00:47	OBJ	<p>policies. I urge Camden to refuse on these grounds.</p> <p>Felicia Olney</p> <hr/> <p>As a resident of Willow Cottages I am writing to object to this application for basement development.</p> <p>While the size of the proposed development has been reduced there is no significant decrease in the risk to the stability of Willow cottages and their retaining wall. All 9 cottages and the wall are grade 2 listed building</p> <p>Potential damage to frail structures.</p> <p>The application fails to take account of the very rudimentary building techniques used in constructing a row of mid 19th C workers cottages and the effects of pressure and vibration on the cottages listed retaining wall which is at its most fragile at the nearest point to the proposed development.</p> <p>Risk of flooding</p> <p>The presence of underground tributaries of the river Fleet is well documented in this area and was evidenced some 15 years ago when serious flooding occurred during basement excavations at number 44 Willoughby Rd. 44 stands directly opposite number 31.</p> <p>Use of Burnham scale.</p> <p>This was devised to assess risk to reasonably sound structures. Willow cottages and the wall are not in "reasonably sound" condition.</p> <p>No public benefit</p> <p>The application is for a series of small basement rooms that appear to be without natural light or ventilation. They offer no public benefit to counterbalance the potential risk of damage to listed structures.</p> <p>.This is the applicant's third attempt and should be rejected on the same grounds as previously</p> <p>Hilary King</p>

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2024/5203/P	oliver froment	27/12/2024 20:13:33	OBJ	<p>Objection to planning application 2024/5203/P  Site Address 31 Willoughby Road London Camden NW3 1RT  Noncompliance with NPPF section 16 on listed buildings  This new application should be clearly rejected in its entirety because it does not comply with the NPPF section 16 on listed buildings.  The following policy in the NPPF is totally relevant to the present application and reason for rejection:  "Paragraph 201: "Where a proposed development will lead to less than substantial harm to the significance of a designate heritage asset, this harm should be weighted against the public benefits of the proposal"  In this new application, just like in the previous application (reference 2020/0927/P that was refused by the Council on 02-02-2023), there will be harm to the significance of a designated heritage asset whilst this application brings no public benefit whatsoever. This is analysed and explained in detail in the report commissioned by a resident to GCG on 11th December 2024.  Noncompliance with the Camden Local Plan and the Hampstead Neighbourhood Plan  The following objection for the previous application still stands for this application:  "The proposed basement excavation, by virtue of the extent, depth and proximity to neighbouring listed buildings and the complexity of the construction sequence is considered to result in the potential for harm to Willow Cottages a heritage asset contrary to policies A5 (Basements) and D2 (Heritage) of London Borough of Camden Local Plan 2017 and BA2 of Hampstead Neighbourhood Plan 2018."  Faulty BIA  The BIA submitted by CGL dated June 2024 is faulty on many counts.  In correspondence from the Geotechnical Consulting Group," GCG", dated 11th December 2024, commissioned by a resident at Willow Cottages, this leading, well established and highly respected Geotechnical firm clearly explains the harm that this application will inflict on the listed walls and points to the many flaws and shortcomings of the latest application, e.g.:  The Burland Scale assumes that the structure of a building is composed of structure in good structural conditions. This is not the case here as the structural composition of this heritage wall is frail hence highly susceptible to any ground movement or stress even if marginal.  - "Moreover, the calculation is unsafe: it assesses damage based on the strain cause by the basement construction, and implicitly assumes that the structure is currently in a good state of repair, with no existing strain having developed within it. This assumption is manifestly wrong – it is known that the wall is in a poor state of repair and shows signs of existing movement and structural distress.  - The site-specific investigations confirm that made ground, Claygate and possibly head deposits are present, overlying London Clay, and thus soil conditions exist to permit lateral groundwater flow above the top of the London Clay.  - The proposed basement is to extend into the London Clay, and therefore will act to 'dam' any such flow.  - Moreover, if the groundwater behind the wall is approximately at the level of the path, there is in practice very little gradient to induce flow, and below the level of the Willow Cottages passage, groundwater flow would most likely continue to follow its natural course – namely, to the east.  - It is predictable that this will then lead to a rise in groundwater level behind the basement/dam. This is then likely to generate exactly the flow that CGL allege is already occurring – south to north flow through the retaining wall, into the rear passageway to Willow Cottages, creating an increased risk of flooding on the property of Willow Cottages  - It is clear that the proposed basement will impact on sub-surface groundwater flow that currently follows the natural topography and historic hydrology of the site.  This will impair drainage from areas that already have a raised flood risk, and in doing so, worsen the flood</p>

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				<p>risk by some degree.</p> <ul style="list-style-type: none"><li>- At this point, it should be noted that any increase in water level behind the retaining wall would also impose an additional hydraulic load on the wall, so has the potential to destabilise the wall, so the effect of groundwater rise may not just be increased flood risk, but significant structural damage.</li><li>- It is clear that the proposed basement will impact on sub-surface groundwater flow that currently follows the natural topography and historic hydrology of the site.</li><li>-This will impair drainage from areas that already have a raised flood risk, and in doing so, worsen the flood risk by some degree....</li><li>-In summary while the current proposals for a basement development at 31 Willoughby are of a smaller scale than previously submitted... they are not materially different, when viewed against the Reason for Refusal that applied to the previous scheme.”</li></ul> <p>Please refuse. Oliver R Froment</p>

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