
From: Michael Webber
Sent: 04 February 2025 17:00
To: Planning; Edward Hodgson
Cc: CORDEIRO, Francesca (IMPERIAL COLLEGE HEALTHCARE NHS TRUST); John Beighton
Subject: OBJECTION to Planning Application 2025/0063/P
Attachments: Chester Terrace Gardens retaining wall_P&M letter_2024 05 29[1][1][2][2][5][1].pdf; Chester Terrace Gardens retaining wall_P&M letter to CTRA_2024 10 18[3][5][1].pdf; 230307 - 7613 Chester Terrace - review of reports.doc[7][1][1][3][11][1][1].pdf; Price & Myers abridged email 21124.docx

Importance: High

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Sirs

1. We wish to formally & robustly oppose the planning application reference 2025/0063/P.
2. Please note that all the extensive communications & evidence that the Chester Terrace Residents Association has historically provided to Camden re the planning application 2023/0282/P needs to be taken into consideration & read regarding this linked planning application reference 2025/0063/P.
3. The contents of this email should also be fully taken into consideration regarding the evaluation of Planning Application 2025/0226/T.
4. It should be noted that the proposed works in Chester Terrace Gardens involve the wholly unnecessary use of a huge 21 tonne excavator for the proposed minor works planned ...the rebuilding of just 1/3 of the retaining wall.
5. Attached is the October 18th 2024 letter from Price & Myers, which provides a detailed explanation as to the damage that will be caused by the use of this unnecessary piece of machinery.
6. Attached also is a copy of the Price & Myers' May 24th 2024 letter.
7. Additionally attached is an abridged email from Price & Myers of November 21st 2024.
8. All three communications explain the technical engineering reasons as to why it is not necessary for the applicant to use a 21 tonne excavator.
9. The core essence of which is that by installing more piles at closer centre spacings and in a different configuration it will reduce the load required on each pile. The result is that the piles, for the rebuilding of one third of the retaining wall, can be installed using handheld equipment.
10. Price & Myers is a highly reputable, expert & experienced consulting & structural engineering practise established in London in 1978, with a staff of circa 170 people. In their first 45 years they completed over 30,000 projects & won over 850 design awards.

11. The independent, tangible evidence therefore shows that using a 21 tonne excavator is totally unnecessary & we urge Camden to take this into consideration regarding their review of the planning applications appertaining to this matter.
12. **Under the circumstances therefore, there is simply no valid need to temporarily deconstruct 2 bays of the Outer Circle dwarf wall for site access, which is the core objective of the 2025/0063/P planning application.**
13. Attached also is a copy of the report by TZG, another structural engineer, which further corroborates the Price & Myers' analysis regarding the validity of using hand-held equipment to install the piles.
14. We recommend that Camden undertake an appropriate level of independent technical engineering due diligence in order to show that there is no justification for a 21 tonne excavator by referencing the evidence provided by Price & Myers.
15. The ramifications and impact of Price & Myers' clear-cut conclusions are substantive & material because it means that there should be no needless cutting down & destruction of mature trees, mature shrubs & vegetation in Chester Terrace Gardens.
16. Additionally, Nick Bell's, Camden's own Tree & Landscape Officer, email on February 21st 2024, set out detailed reasons why the trees in Chester Terrace Gardens should be protected. Moreover, he cited Local Plan policy A3. point J. which states "the council will: resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation".
17. Chester Terrace Gardens help to mitigate the effects of climate change and they provide an important natural habitat. Chester Terrace Gardens fail, today, to meet the annual mean objective for NO2 levels. Additionally, the destruction of mature trees, mature shrubs & vegetation in Chester Terrace Gardens will have an adverse effect on the area re ecology, biodiversity, air quality, water management, health and the well-being of the public.
18. Furthermore, there will be a material loss of privacy suffered by Chester Terrace's residents.
19. Charlotte Meynell, Camden's Senior Planning Officer, stated in her email to the applicant on May 16th 2023 that the parameters & unambiguous tree replanting criteria were that "the proposed planting should include the same number of replacement trees as existing, in the same locations as existing as much as possible, and with trees of a similar height to the existing".
20. The proposed tree replanting ignores these parameters & proposes using small tree saplings that will take 40 to 45 years to reach the existing height of the mature trees, which the applicant intends to needlessly chop down & destroy. This proposed action by the applicant is understandably manifestly unsatisfactory & unacceptable.
21. Additionally, the proposed tree replanting is not evenly spread out along the entire length of Chester Terrace Gardens, as it is today.
22. The Chester Terrace Residents Association & Chester Terrace residents hope that Camden will takes its decision, regarding this planning application, impartially, fairly and on merit, using the best evidence and without discrimination or bias.
23. All the evidence shows the proposed act of vandalism by the applicant, the CEPC, is unwarranted and preventable.

We look forward to hearing from Camden in reply if there are any arising questions or queries.

Yours sincerely

Francesca Cordeiro, Chair

John Beighton

Michael Webber

Chester Terrace Residents Association