**Objection to Planning Application 2024/3671/P – Excavation of large basement at 188 Goldhurst Terrace, NW6 3HN**

I wish to object to his further large basement excavation in this part of the South Hampstead Conservation Area, with many existing basement excavations already planned or in place in close proximity, on the grounds described below.

**General comments**

Unhelpfully, there is still no Design & Access Statement provided (which one might expect for such a major and disruptive project), and therefore there is no clarity as to how this application relates to the recent, earlier consented application 2024/3529/P, which granted a full width rear extension losing the rear bay window despite neighbours objections to loss of heritage features.

The two applications would appear to be in conflict, as regards the proposed treatment of the ground floor extensions areas to the rear of the property and the developer needs to clarify this point. It is presumed that 2024/3529/P is not being proceeded with, as this would change the nature of the basement proposed. Also, no detail is provided in this application to understand how the proposed depth of the new rear extension lines up with neighbouring extensions nor are there illustrations to give an understanding of the materials proposed or amount of glazing or the nature of the flat roof etc. nor is there any information on the appearance of the large lightwells at the front, which are not a normal feature of the area.

I also note that a 2nd revision of the Basement Impact Assessment (BIA) dated March 2025 has just been uploaded to the Case Website and all comments below concerning the BIA relate to this version, which, from memory (as the first issue has been removed from the Case Website), is no less deficient and inadequate than the first issue, with wholly insufficient due diligence of the local area having been undertaken, and inadequate actual on-site creation and monitoring of boreholes and trial pits. The BIA appears to have been an entirely cost-cutting, desk-based exercise, lacking in adequate due diligence even for the desk-based part of its investigation, let alone the almost totally absent on-site investigations.

**Excessive number of basement conversions in this immediate area whose aggregate and collective effect is not being addressed despite the requirement to do so in the Camden Strategic Flood Risk Assessment (SFRA) document (July 2014)**

I object to this proposed excavation of yet another substantial 100sqm area basement (including lightwells) in a locality within the South Hampstead Conservation Area that already has at least 5 other existing substantial basement excavations within just a 50m radius of the subject site, without adequate due diligence having been performed in the BIA.

The area already has some issues with elevated groundwater levels- evidence will be provided in a later section of this objection. All the other nearby basement excavations have been constructed within the last 15 years or so. The Basement Impact Assessment (BIA) document has clearly done insufficient desk-based due diligence by not even recognising/identifying all of these very nearby and large existing/proposed basement developments. It certainly makes no attempt to analyse their cumulative/aggregate effects on groundwater levels and flows in the area which is a requirement of Camden's Strategic Flood Risk Assessment document. (See: https://www.camden.gov.uk/documents/20142/0/download+%2815%29.pdf/37025249-3da8-4fe1-3075-aa025d3b66de Key extracts from the SFRA document are included in Appendix 1 at the end of this Objection, for ease of reference.

The Camden SFRA is an important document and includes full coverage of the interplay between flood risk and groundwater levels and applications for basement excavations and I would request the BIA Engineer and Camden's BIA Auditors, and the Case Officer to urgently please carefully read paras. 6.4.3 to 6.4.9. This includes a very helpful illustration of how existing groundwater flows can be significantly changed by a basement excavation (see Figure 6.1 and its description in para. 6.4.6). For ease of reference, Appendix 1 at the end of this objection includes an extract of paras. 6.4.3 to 6.4.9, including Fig. 6.1 which gives a very helpful illustration of the effects that building a large, impermeable basement structure can have on groundwater flows.

The Camden SFRA document also goes on to say (para. 6.4.6) that: *"As part of the assessment carried out for basement development it will be important to identify any potential receptors which may be affected by the change in water level. Locally within the LBC area, the main receptors are likely to be existing basements, various abstraction sources from the River Terrace Deposits and groundwater-fed water features. A basement search radius of 500m around a development is advisable to inform a basement impact assessment."*
(Note: The underlining is the author's own emphasis)

Camden's Strategic Flood Risk Assessment document, also notes that the *"main mechanism impacting groundwater levels is the disruption of groundwater flows through basement development. The creation of a barrier in the sub-surface may cause an obstruction to groundwater flow, which can lead to a change in the water table upstream or downstream."*

It appears that the recommendation of a basement search radius of as much as 500m is persistently (and probably deliberately?) being ignored by almost every BIA. Very few BIAs for proposed basement excavations in the close vicinity list even a handful of other excavations within less than 100m of the subject site, while most (regrettably including this one) do not even do that. It is likely that there will be at least 15 to 30 new basements that have been excavated in the last 30 years within a radius of 500m.

The aggregate effects on groundwater flows of such a large number of new impermeable basement structures, could have a significant and very unpredictable effect on the groundwater flow directions and levels in the area, and could easily cause unexpected and undesirable effects around existing properties and gardens. No-one has yet attempted to model and quantify this. The BIA seeks only to propose measures to mitigate problems on the subject site; it very misguidedly and selfishly ignores assessing possible groundwater effects on other nearby properties for which there must be a clear duty of care demonstrated by the applicant/developer, so as not to cause new, or aggravate existing, problems with the effects of groundwater displacement.

Camden must in this case (188 Goldhurst Terrace), and routinely for future cases in the South Hampstead Conservation Area, insist on a much more exhaustive list of recent basements built within 500m of the site, and before considering whether to give consent for such a significant further excavation.

The BIA only mentions the basement excavation proposals at 190 and 192 Goldhurst Terrace insofar in that it has sought to re-use/adopt, and somewhat duplicitously re-present as its own exploratory work, their very historic borehole and trial pit data from as long ago as 2016 and 2022 (It is not clear if permission for this infringement of the copyright of others work in those earlier BIAs, was obtained? ).

For the record, there are already very nearby existing basement excavations at the following five addresses, all within around 50m of the subject site at 190, 251, 253, 255, 261 Goldhurst Terrace (GT). There are also further basement excavations only around 100m away at 166, 156 and 231 Goldhurst Terrace, with several beyond those, in the same road. There was also a recent application at 192 GT (just two houses away) for a basement excavation in 2022, but thankfully this has now been withdrawn.

In addition, and even more concerningly, the owners of the large site at No. 194 Goldhurst Terrace, just 3 houses away from the subject site, are themselves now requesting in a current planning application (2024/0012/P) a wholly excessive total volume of new basement excavation as part of a massive over-development of the site. The total proposed volume of excavation on that one site (194GT) is approximately equivalent to more than three times what has already been excavated next door to the subject site at 190 Goldhurst Terrace, and equally is more than three times the volume of what is now being proposed for excavation at the subject site (188 GT) immediately next door to 190 GT.

The BIA has seemingly done almost no due diligence in determining what new basements already exist in the immediate vicinity, and still less those that are still under planning consideration. This is a dereliction of responsibilities for what purports to be a comprehensive BIA, and these serious omissions (as well as others to be addressed below) must be flagged as non-compliances by Camden's BIA auditor, Campbell Reith, who should require another update to be done to the BIA following further due diligence and investigation work, so that it becomes fully comprehensive and fit for purpose before it can be seriously considered as supporting evidence for this Application.

The potential effects on groundwater flows of no less than 4 immediately adjacent properties (Nos. 194, 192, 190 & 188 GT) each potentially having large basement excavations (and with the 194 GT excavation on its own having the equivalent volume of 3 normal terraced house basement excavations) does not bear thinking about, and must NOT be left unaddressed by the BIA, by Campbell Reith or by Camden Planning themselves.

## Gross over-development of basement excavations in this very small area- Camden needs to impose a moratorium to allow review of cumulative impact and to limit density of basement excavations in a flood-prone area

This gross over-development of basement excavations within such a small area, suggests that It is now time for Camden to impose a moratorium on any further basement developments - certainly in this part of Goldhurst Terrace and perhaps more widely in the South Hampstead Conservation Area, which is well acknowledged as being at risk of flooding, and has indeed been flooded several times over the last 50 years.

The well-known propensity to flooding in this area is clearly evidenced by Camden themselves having committed to spend some £180k+ on an expensive set of rain-gardens/new trees at the top-end of, and upper half of, Goldhurst Terrace – stated to be primarily as a mitigation against excess surface water flows during heavy rainstorms. If Camden admits, by its very actions in introducing these measures, that expensive mitigation is needed against flooding in this area (at public expense), how can it possibly continue, at the same time, to be fully complicit in allowing the over-development by private individuals of excessive numbers of basements in the vicinity? All these extra new basements simply exacerbate the propensity to flooding by increasing hard-landscaping and surface water run-off and – even more importantly- by unpredictably disturbing groundwater flows.

Camden urgently need to use this moratorium period to analyse whether further constraints are needed in Camden Planning Guidance (CPG4) and Policy A5 (Basements) to limit the total number of basement conversions within a given small area- say within a 60m radius of one another, and to impose the absolute requirement on BIAs to undertake cumulative impact assessments when there are other basement excavations within a small area of the application site. Camden must also tell its BIA Auditor (Campbell Reith) to raise their compliance standards for BIAs. In recent years many inadequate and poorly-researched BIAs, with non-site-specific boreholes/trial pits and out-of-date data, have been allowed through without any substantive challenge or push-back . This lack of rigour reflects poorly on the professionalism of all concerned, but even more seriously, puts at risk

other residents who will suffer the effects of unpredictable groundwater flow and level changes over many years to come, with the ever-increasing risk of extreme rainfall events.

**Nearby properties that already suffer from unpredictable groundwater effects**

A simple desk-based search of the many comments and objections recently lodged as a result of the still-current Planning Application 2024/0012/P for gross-overdevelopment and excessive basement excavation at 194 Goldhurst Terrace (less than 30m from the subject site) for example shows the following nearby examples of flooding and/or elevated groundwater levels:

- In the 1975 severe rainfall event a nearby basement at 62 Priory Rd (only about 90m from the subject site) was flooded.

- the original basement/cellar of No. 196 Goldhurst Terrace regularly floods after periods of heavy rain (only about 50m from the subject site).

- The rear gardens of both 261 and 263 Goldhurst Terrace are regularly flooded and/or waterlogged (only about 30m from the subject site).

**No boreholes have been sunk or trial pits have been excavated at the subject property**

No boreholes have been sunk or trial pits have been excavated at the subject property at 188GT. This is negligent, and a false economy, and must now be done, and the new boreholes should be monitored over the 4 seasons of a full year before the application can be considered any further

It is noteworthy that the equally flawed BIA for the 194 Goldhurst Terrace planning application (2024/0012/P) with an enormous volume of proposed basement excavation, did not itself even undertake the drilling and extended monitoring of groundwater levels in their own new boreholes, but instead simply relied on the boreholes that had been drilled at 190 Goldhurst Terrace. Yet another false economy.

Similarly the BIA for the current application at 188GT has resorted to the same unprofessional and lazy cost-saving tactic. It is using the same borehole and trial pit data obtained nearly 10 years ago in January 2016 for the next door property at 190GT. Even this data is inadequate as it was only taken over a period of a few weeks, and therefore did not monitor groundwater levels over the four seasons of a full year.

The almost 10 year old borehole data for 190GT (that has once again been copied for the current version of the BIA for the Application at 188GT) showed that for Borehole 1 (BH1) at the rear of the 190GT property (the 'uphill side'), groundwater was encountered at 0.8m below ground level (bgl) and that subsequent monitoring indicated water at 0.56m bgl in BH1. This is not a promising finding, given that the basement excavation will have to extend to a depth of some 2.5m bgl!

For BH2 at the front of the property (ie. on the 'downhill' side) water was encountered at a much deeper depth. This does indeed suggest that there is a gradient in the level of the groundwater/ perched water.

The current BIA for 188GT also refers to trial pit data taken at 192 GT in 2022. Again no new trial pits at all were dug at 188GT –was this an accidental, but negligent, omission or a deliberate cost-saving measure?

There is now an urgent need for new boreholes to be drilled <u>at 188GT</u> at the back and front of the property, <u>and for groundwater levels then to be monitored at monthly intervals for a full year</u>,

before any definitive conclusions can be drawn on the acceptability (or otherwise ) of groundwater levels for a basement excavation there.

Similarly, several new trial pits need to be excavated at 188GT at the front and back. All this must be done before the next update draft of the BIA can eventually be produced, and before the BIA can then be considered to be in a fit state for Camden's BIA auditors (Campbell Reith) to be asked to sensibly perform an audit.

The current version of the BIA speculates as follows in respect of the water found in BH1 almost 10 years ago at the next door property: *"The monitoring data is not attributed to a continuous ground water body; more likely it represents perched water within Made Ground /Head Deposits or local infiltration into standpipes form surface water drainage".*

It would be highly desirable for the eventual, more fact-based BIA not to have to speculate in this way on the background of 10 year old data, and instead to have absolutely current, on-site data, taken over a full year. Then far less, unprofessional, speculation will be necessary, and far more reliance can be placed on the real veracity and reliability of the BIA.

**Major/Extreme Rainfall flooding events recorded in BIA have omitted the July 2021 rainfall/flood events**

The BIA correctly references the 1975 and 2002 Extreme rainfall events in the local area which both caused significant flooding in parts of Goldhurst Terrace and some other nearby streets.

However, very negligently, it completely overlooks the equally severe and much more recent two extreme rainfall events of July 2021 that again caused even worse flooding in Goldhurst Terrace and nearby other streets. This betrays a major and worrying lack of due diligence.

As the effects of climate change become more pronounced, the likelihood is of more frequent such extreme rainfall events and flooding. The BIA seems to wilfully downplay/ignore this issue in general and specifically has not referenced or investigated in any way the two events in 2021?

**Conclusion**

The BIA is insufficiently comprehensive and rigorous and lacking in due diligence to be regarded as fit for audit by Campbell Reith on behalf of Camden Planning.

More on-site investigation and desk-based investigation work is needed to allow the BIA to be revised and updated in about a years time, at which point it may finally be fit for auditing by Campbell Reith.

No progress can be made on the overall application until the BIA has been improved and made more rigorous and accurate, as described, and then satisfactorily audited.

In the meantime, based on the current documentation I strongly object to this application and recommend it be rejected or 'paused' for at least a year before any further review by the Planning Officer, until the BIA has been sufficiently improved and has then been suitably and positively audited by Campbell Reith for Camden.

There is a worrying recent trend for basement excavation applications in this small portion of the South Hampstead Conservation Area to have ever more inadequate BIAs, lacking in adequate due diligence and detailed on-site investigation, and that are not rigorously enough audited by Camden's BIA auditors.

Camden Planning is recommended to urgently consider whether its guidelines on BIAs and to its BIA auditors, now need to be considerably tightened-up. In the meantime Camden should consider imposing a planning moratorium on the consideration of any more basement excavation applications in the South Hampstead Conservation Area. The moratorium should only be lifted once Basement Planning Guidelines and BIA Guidelines have been thoroughly reviewed, publicly consulted upon, and adequately tightened-up.

E. Peel, Goldhurst Tce. NW6 3HN

16 March 2025

**Appendix 1**

**Extracts from the Camden Strategic Flood Risk Assessment (SFRA) document 2014 relating to the effects of basements on Groundwater Flows**

***Basement Dwellings***

6.4.3 LBC guidance CPG4[49] covers basements and lightwells and supports the policies in the Local Development Framework (LDF). There are two aspects relating to basement dwellings covered by the guidance;

1. *basement impact assessments, principal impacts of basements, planning and design considerations; and*
2. *how basement dwellings may be affected in streets at risk from flooding.*

6.4.4 The issue of basements built within the borough has received a lot of recent press coverage. The issue which a groundwater specialist needs to consider is how the basements will affect groundwater flow in the local area. Factors which will influence this are the geological setting, thickness of the strata, the depths to the water table and permeability/confining nature of the layers. The creation of a barrier in the sub-surface may cause an obstruction to groundwater flow, with can lead to a rise in the water table on the upstream side and a fall in the water table on the downstream side. An example of what may happen to groundwater flows when a single basement is constructed is shown in the diagrams below.

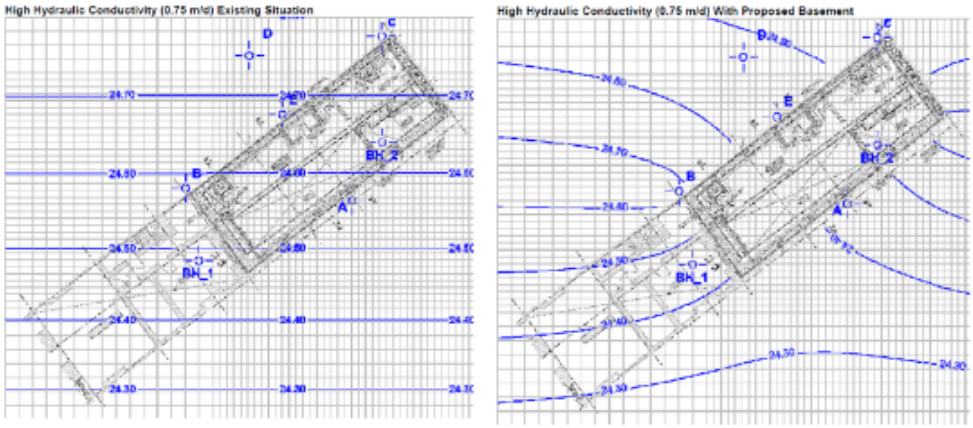


**Figure 6.1: Groundwater flows around basements – pre and post-development**

6.4.5 Moreover, if a basement development is close to a well or a spring feeding a surface water feature, the effect of groundwater taking a new flow pathway may result in reduced flow to the well or spring. Alternatively, a dormant spring may be reactivated or new spring activated, causing groundwater to take a different flow path. A larger basement will have a larger impact on the groundwater flow regime. A Basement Impact Assessment should assess the likely damming effect of the development and assess the likely rise in groundwater levels. The impact should not be considered in isolation. An example of predicted groundwater rise is provided below.

6.4.6 The pre-development conditions (Figure 6.1, left hand drawing) show groundwater movement in a southerly direction (at right angles to the blue groundwater contours). With the basement constructed (Figure 6.1, right hand drawing) – it is predicted that groundwater levels would rise by 0.2m on the north west side of the structure, and correspondingly lower to the south east. As part of the assessment carried out for basement development it will be important to identify any potential receptors which may be affected by the change in water level. Locally within the LBC area, the main receptors are likely to be existing basements, various abstraction sources from the River Terrace Deposits and groundwater-fed water features. A basement search radius of 500m around a development is advisable to inform a basement impact assessment.

6.4.7 In terms of groundwater flooding basement impact assessments should consider the following:

- Quantitative assessment of groundwater level rise; and
- Design the basement and selecting construction method to minimise the impact on groundwater flow.

6.4.8 This is relevant to both groundwater within River Terrace Deposits, and within perched water within sand pockets within London Clay and Bagshot Beds.

6.4.9 The other issue which may affect basement dwellings is in streets which are affected by surface water flooding. Basement dwellings are classified in the NPPF as Highly Vulnerable development and therefore should be discouraged within areas at risk of surface water or groundwater flooding. LBC Core Strategy Camden Development Policy 27 – Basements and lightwells (see Section 2.4.6) outlines requirements for basement development when it is proposed. Adverse impacts on drainage and runoff must be avoided.