

Combined Residents' Associations of South Hampstead

LB Camden

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CENTRAL MAILROOM Registery Support Office - 01

Niall Sheehan,

Regeneration & Planning Development Management

London Borough of Camden

Town Hall

Judd Street London WC1H 8ND

6th June, 2014

Dear Mr Sheehan

Planning Application ref: 2014/2979/P 78 Greencroft Gardens, NW6 3JO

In view of the fact that full details of this application have only been available on the Camden Planning website since yesterday, 5th June, I expect this letter, which refers to the above application, to be considered even if it is received after the closing date for comments.

This association has extensive evidence that almost every basement excavation permitted by Camden in recent years has resulted in damage of some kind to neighbouring properties. As a consequence we now wish to put on record our strong OBJECTION to plans to excavate a basement at the above address. Our reasons are as follows:-

- 1) This application is not, as suggested in the application, a simple "enlargement of an existing basement." This building has, like most of the Victorian properties in the South Hampstead Conservation Area, a very small existing cellar, which is situated just some 6ft or so beneath the ground floor. It is this that the applicant plans to excavate and extend. To term the proposed works as a simple enlargement is disingenuous.
- 2) From the details contained in the Basement Impact Assessment it would appear that the site investigation has been cursory at best. The BIA even admits as much, stating that the boreholes and trial pits have been "investigated only as instructed by the client or engineer on the date shown." It goes on to state "we are therefore unable to accept any responsibility for changes in soil conditions not investigated i.e. variations due to climate, season, vegetation and varying ground water levels." This is a worryingly insubstantial examination on which to base the suitability of the site for excavation. Drilling just one set of trial pits and boreholes, in any event, has been proven in past applications to produce inexact and unreliable results. Since such surveys necessarily involve the

sampling of only a small proportion of the proposed site it is inevitable that variations in ground conditions including groundwater will remain unrecorded around and between the exploratory boreholes. These are likely to change from month to month depending on weather conditions and other man-made influences. Groundwater levels and pressure vary seasonally and the only way to gauge accurately these and the local soil conditions is for tests to be repeated several times over several months. It is the failure to carry out this sort of lengthy, repeated investigation which has caused so many of the flooding and destabilisation problems experienced by local residents who live close to basement developments.

- 3) Paragraph 2.4 of the BIA (No 2) confirms that the site has yet to be efficiently investigated. "On commencement of construction" it states, "the contractor will determine the foundation type, width and depth. Any discrepancies will be reported to the structural engineer in order that the detailed design may be modified as necessary." Such a statement is totally unacceptable! The technical, hydrological and geological details of such a development must be evaluated and enumerated before the application can be properly considered and must certainly be exhaustively researched and resolved before any work commences. The Construction Management Plan provided by the London Basement Company, which is attached to this application, contains extensive detail about traffic management, builder's supply deliveries and the disposal of waste but is distressingly light on a comprehensive outline of the actual method of construction planned for this development.
- 4) The applicant has not provided a Flood Risk Assessment when, of their own admission, site examination has been confined merely to a perfunctory "walkover survey". No trouble has been taken to accurately assess the state of the water table in a street which is already on Camden's list of Streets at Risk of Flooding. No mention is made of the northern tributaries of the Westbourne River which lie beneath this part of Greencroft Gardens. The whole of South Hampstead was historically a water meadow and CRASH has a volume of recent evidence that groundwater flow is currently being affected by the number of basement excavation works in the area. Recent increases in flooding and water-logging of many gardens suggest that underground water levels are rising. It is no coincidence that, in Canfield Gardens, for example the next street to Greencroft almost every property neighbouring basement works has experienced flooding of cellars or gardens or seen increased levels of standing water after heavy rain.
- 5) Assurances that neighbouring properties are unlikely to be damaged as a result of excavations, have been asserted by developers in virtually every other basement application made within this area. Yet an extensive survey carried out by CRASH amongst residents neighbouring such excavations revealed they were the direct cause of at least seven reported neighbouring cellar floods (one with sewage) and numerous instances of cracking, subsidence and destabilisation to adjoining properties. CRASH is advised by Dr Michael de Freitas, distinguished Research Fellow and Emeritus Reader of Engineering Geology at Imperial College, London who tells us that recent research has shown ground movement, even after minor excavation, can continue for as long as eleven years after building works are completed. If a hole is dug, something will fill it, be it subsiding soil or a diverted flow of water. Furthermore, he states, "groundwater which previously flowed around and through the foundations of one building will, when that building is excavated, inevitably be

re-coursed towards and around the structure of a neighbouring building." There are numerous reports of severe destabilisation to the 'non-developed' half of adjoined semi-detached properties when a new basement excavation is underpinned but the remaining part of the building is left "hanging". An example of the sort of damage such building work can inflict is provided by residents of houses in this very street where neighbours of a basement development at no. 92 Greencroft Gardens suffered serious damage on all four floors of the house. Reparation is still being sought seven years after the work was carried out.

6) The increased hard standing which would result from this excavation will add to that which has already been allowed by Camden with permissions for off-street parking, rear extensions and the digging out of basements. This has had a dramatic affect on rainfall run-off and soak-away and is likely, ultimately, to have dire consequences for the area as a whole as the cumulative effects of increased hard-standing – currently woefully unrecorded by Camden - becomes apparent.

All in all, this is a most unsatisfactory and incomplete application and, CRASH contends, should not even be considered in its present form.

CRASH has continued to campaign against basement excavation in the South Hampstead Conservation Area where 'digging out' has now reached epidemic proportions. Our association has been overwhelmed with reports of the consequences for neighbouring properties and concerns for the long-term effects on the environment which Camden continues, seemingly, to ignore, presumably because many case officer's are still insufficiently briefed in the challenging detail of environmental geology and do not always to understand the exacting science involved in such developments.

CRASH believes the cumulative effects on the local environment of so many basements in one relatively small area have yet to be fully investigated and assessed by Camden Council, and that to continue to ignore the consequences of allowing further excavations is to court eventual disaster.

For these and all the reasons listed above, we ask you to refuse this application.