



10A SOUTH GROVE
HIGHGATE
LONDON N6 6BS

Gideon Whittingham Esq
Planning Officer East Area Team
London Borough of Camden
Town Hall Extension,
Argyle Street, London WC1

1st October, 2013

Dear Mr Whittingham

2013/4475/P, 2013/4539/L - Witanhurst, 41 Highgate West Hill, N6 6LS
Extension to Gatehouse, Elevational Alterations, Basement Extension

I am writing on behalf of The Highgate Society to register our strong objections to the proposed basement extension included in this application, for the following reasons:

(1) Damage to Neighbouring Properties Arising From the Existing Basement

The Hampstead and Highgate Express for September 26th reported on growing evidence that neighbouring properties are suffering severe adverse consequences from the massive basement which has already been excavated on this site. There are problems in The Grove which appear to be consistent with a local rise in ground water levels caused by a damming as underground water flows have slowed negotiating the substantial basement footprint under the main house. In addition, we have been made aware of extensive damp problems and localised basement and garden flooding at several properties on Highgate West Hill and Highfield Grove directly below the Witanhurst site. These suggest that surface water run off may also be a problem.

Camden's development policy DP27 states that '*Basement development will only be permitted where it does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. Development proposals are required to protect the stability of neighbouring properties, including in this case the road known as Highgate West Hill, avoid adversely affecting drainage and run-off or causing other damage to the water environment, and avoid cumulative impacts upon structural stability or the water environment in the local area.*' All basement developments are therefore required to demonstrate that all such issues have been considered prior to determination.

In addition, CPG4 (Basements and Lightwells) advises that basements will only be permitted where they do not cause harm to the built and natural environment and local amenity, result in flooding or lead to ground instability. It puts the onus on the applicant to establish that there will be no harm.

In the light of experiences on surrounding properties, it is clear that the wider duty of Camden must be to

- (i) ensure that developers remedy these problems when identified, and effectively repair the damage already caused;
- (ii) ensure that the conclusions of the geological and hydrological reports which were submitted to support that excavation are fully investigated for soundness, as reliance is also placed upon them in the current application.

It is clearly essential that these full investigations take place before any further basement excavations can be considered on this site. We consider that any additional basement excavation before such investigations have been carried out would be in contravention of DP27 and CPG4 and constitute a failure of Camden's duty of care to surrounding residents.

Our detailed objections to this application are as follows:

(2) DP27(b) and DP27(c) - Groundwater:

HR Wallingford (HRW) state that, although the site is above an aquifer, the basement will not extend as far as the water table (below), and that the proposed works will (therefore) not affect groundwater flows and levels.

However, basements, even when built in a sandy environment as this one will be, can and do cause ground water flows to slow and, in so doing, to cause damming of groundwater and localised increases in the water table. As noted above, the evidence from surrounding properties suggests that the construction of the original basement may already have caused such a localised increase in the level of the local water table and/or changes to ground water flows, diverting them towards properties with no previous history of ground water problems. It is regrettable that the BIA appears to have made no attempt to investigate these outcomes and merely relies on the previous assessment.

We consider there must be a danger that the combined effect of the direction of the slope and the 'hook' shape of the proposed basement extension, positioned at the top of the site, could exacerbate the ground water problems already encountered. Yet, no cumulative development assessment has been made for the new basement in the context of the substantial existing basement, or adjacent cellars along The Grove. We do not consider that this report satisfies DP 27 (c).

No details are given of how ground water flows might be funnelled through the new narrow corridor of ground between the new basement and The End House of The Grove. Any such funnelling will increase the velocity of ground water flows and the faster the flow, the more erosive the capacity of the water with the potential for old style foundations to be undermined, particularly in sands, by scouring and washout.

In addition, contours suggest a potential deflection of ground water flows around the new basement towards Witanhurst Lane and 78/79 Highgate West Hill, but this appears not to have been considered.

(3) DP27(a) - Land Stability:

Information as to what form the 'appropriate support' for the temporary and permanent works will take, and how these temporary works will impact on the construction process and long-term water flows or the adjoining public highway, is inadequate. For example, there is no indication of what lateral drainage scheme is being proposed for the temporary works, and what deflection might be expected in these, given that this is a Grade II Listed building. In addition, no note has been taken of previous subsidence on West Hill itself, which follows a shallow valley not far from the proposed site of this basement.

(4) DP27(b) - Surface Water:

It is regrettable that although the developers are aware of the surface water issues noted above, no mention is made of them in the report and no details of ground water flows across the site have been provided.

(5) Depth of excavation:

The detail provided is inadequate to fulfil the requirements of CPG4 and DP27 for a basement which is 5.5m deep, with excavations up to 2m deeper (to 7.5m) for construction purposes.

Table 3.1 – 1b states that excavations will be to a maximum depth of 6m, but this is not consistent with an earlier statement that the floor level of the basement will be 5.5m. The construction zone will be substantially more than 0.5m.

(6) Copper Beech Tree:

Whilst the new basement will be essentially sited outside the root protection zone of the Copper Beech within the courtyard, it will be within centimetres of it and will wrap around two thirds of its diameter. Assuming the ground water flows are approximately North to South, downhill (following the contours of the shallow valley which Highgate West Hill follows downhill towards Swains Lane), the creation of a basement of this shape, in this position, could further trap ground water creating an artesian well effect around its root ball which could lead to root rot.

(7) Connection with existing basement:

No construction detail is provided as to how the existing basement and the new basement will be linked. Details of how the existing drainage soakaway and storage systems ‘will not clash’ with the new basement have not been provided and so cannot be scrutinised. More detail of this key interface between the two drainage systems fulfilling DP27(b) and (c) is required at this stage, prior to determination..

It is not sufficient to package these issues into Decision Conditions or S.106 Clauses (the latter preventing any form of public consultation). Planning guidance is clear that these issues must be addressed before determination by the Development Control Committee so that Members can make an informed and reliable decision based on all the facts.

HRW acknowledge that ‘in view of the very close proximity of the main basement to (this) new basement, the above information (previous investigations) is relevant to the proposed new structure’. However, it gives no indication of *how* it is relevant.

(8). Hydrology Studies:

HRW state that these previous reports ‘were approved by the Council and demonstrated that any changes in groundwater levels would be small in scale and very local in extent.’ However, as noted, accumulating evidence from surrounding properties suggests strongly that this is not the case and that unacceptable consequences are now being suffered by surrounding residents.

(9) Conclusion:

On the basis of the reports we have received of adverse ground water impact from the existing basement, we have the gravest concerns that the application for the proposed additional basement is based on inadequate investigation and assessment of these impacts, and has the potential to inflict significant additional damage. This seems particularly unacceptable set against the given reasons for the additional basement. The fact that the residents of the house do not wish to see staff and deliveries arriving, is not a valid planning reason justifying the grant of permission.

For all these reasons, we urge in the strongest possible terms that the application be refused.

