

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2014/6697/P	Jason Small	72 Kiln Place Lamble Street NW5 4AL	25/11/2014 21:52:42	OBJEMAIL	<p>In principal it is acknowledged that there is an urgent need to construct new homes with the LB Camden as part of the Captial Investment Programme. It is noted that making use of all available brownfield sites is in line with the National Planning Policy Framework (NPPF). However, following review of the planning application supporting documents, i would like to lodge an objection to the proposals on the basis of a number of issues associated with the submission documents/proposals, which are considered material as to whether the construction of 15 dwelling on an estate of 164 dwelling is appropriate and sustainable given the wider CIP. It is arguable whether intensification of other proposed strategic developments to deliver an additional 15 dwellings, in lieu of those proposed for Kiln Place, would be more economically and environmentally sustainable. A summary of the basis of my objection and request for clarifications relating to the material details of the proposals are outlined below as follows;</p> <ul style="list-style-type: none"> • The Traffic Impact Assessment, does not consider the cumulative impacts of consented/planned works on parking provision within the CA-L parking zone area both during construction (duration >1yr) and occupation of the major developments concentrated within the parking zone; • The need to build adjacent, divert or build over the large diameter strategic trunk combined sewer (1395mm) whilst maintaining existing connections serving operational development, which will also need to be diverted. This is a significant abnormal costs/risk to strategic asset introducing residual risk in the event of inadvertent damage • The proposed dwellings forming part of Site 1 will result in virtually no working space on the down gradient of the sewer line. If there was ever a need to excavate down to the sewer (7m depth), this would have to take place up-gradient on the embankment, significantly increasing the cost of any works required. Thames Water has raised concerns regarding proximity of the dwellings and has stated that diversion may be required. The abnormal costs associated with diversion are unknown and are likely to be significant, impacting on the viability if the scheme and programme duration associated with the enabling works (stated as 3mth within Construction Management Plan); • Flood risk mitigation associated with ground floor units at Sites 1, 2 and 3 (sewer flooding/localised surface water flooding issues); finished floor levels/flood resilience measures such as back flow prevention devices for Sites 1,2 and 3 which contain habitable accommodation at ground floor: sewer overloading/surcharging; all existing properties located at least one storey above thresholds for Sites 1,2 and 3 risk in the event of pluvial or sewer flooding not quantitatively assessed; • Removal of trees at Site 3 (T33), identified as diseased within the tree survey report, which was removed in advance of the planning application submission. The tree has been removed following the display of a public notice on the trunk of the tree facing away from the public footpath, which meant that the notice was not displayed in a location which was readily visible, Consequently the siting of the notice meant that it was only the day before the works that i was aware that the tree was due for removal. Following contact with the tree department at LB Camden I was not provided with a detailed response as to the need to remove, prior to the implementation of the works. • Lack of consideration of the geotechnical impacts of the tree removal on the existing structure at Site 2 given the root zone of the tree is shown to extend under the corner of my block (72 Kiln Place). Made ground overlying superficial deposits; • A desk study to identify potential contamination hotpots on site has been submitted. Given previous uses there is a likelihood of presence of contamination within the Made Ground. It is stated

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that no intrusive data is available within the desk study. However, site investigation work has been undertaken at sites 1 and 2 in the form of cable percussion boreholes/window samplers. Post installation sampling of soils and groundwater has been observed to have been undertaken during post monitoring visits from the environmental subcontractors/consultants. The findings of these works should be used to inform whether there are significant issues associated with contamination (remediation costs/duration of muck away operations) and geotechnical issues, such as the potential for ground heave due to removal of overburden pressure and trees on existing substructures and strategic trunk sewer ;

- No consideration of the need to divert existing services, in particular the heating and hot water service pipes located adjacent Site 3, which will need to be diverted and undergrounded to enable the construction of Site 3 dwellings. It is not clear whether these serve just one block . The abnormal costs and programme issues associated with enabling works to facilitate Site 3
- Noise and construction dust associated with piling operations/demolition required as part of the implementation of Site 3 proposals, and i

The proposal forms part of the Capital Investment Programme for the construction of new homes within the borough. There are a number of consented schemes within the CA-L parking area that are currently under construction (Wendling/Vicars Road developments).

The concentration of construction works and associated occupants following completion of the consented schemes within the CA-L parking zone has not been considered within the Traffic Impact Assessment (TIA) report submitted with the application in terms of cumulative demand and post construction availability of parking spaces.

The removal of parking spaces within the estate will exacerbate existing issues associated with parking within the area for on-street permit holders who already face difficulties finding an appropriate spot to park in both during hours, and in particular, post 18:30 hrs, when most parking restrictions are lifted within CA-L zone. My car has been struck by large vehicle navigating the narrow residential roads, causing over £500 of damage following the buckling of my steering rods as a result of an impact. I have returned home to find not one spot available within the CA-L zone extending all the way down to Queens Crescent following a 8hr road trip. The only spot turned out to be on a suspended parking bay, resulting in my car being towed (footpath works along Oak Village).

It is stated within the TIA that the LPA have indicated that out of a total of 47 parking spaces, 20 are available and are un-let. Some of these 20 available spaces are currently occupied by site portacabins. The demand for spaces is somewhat dictated by level of awareness of tenants on the availability of spaces, and process for obtaining an estate permit. Following the difficulties parking within the CA-L zone within a sensible distance of my home, the loss of parking spaces below the 47 provided, for an estate containing 164 dwellings, is considered unacceptable. This permanent loss of parking will not be replaced elsewhere within the estate or the wider CA-L zone, whilst demand for parking from increased population who will reside within the zone will increase. During the construction phase of the consented CIP schemes there is also likely to be a need for parking suspensions in order to allow enabling works and statutory works to take place with the local area. Therefore the cumulative impacts

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of all consented and planned development forming part of the CIP should be taken into account in the TIA in order to conclude that the proposals will have nil deterrent.

In terms of flood risk, the FRA highlights that the site is a low flood risk zone associated with fluvial flooding from watercourses. However, surface water flooding and sewer flooding is a tangible impact both to and from the development. The presence of the deep strategic Thames Water combined sewer which traverses site 1 has been considered and outline proposals submitted. However, the impact of a collapse of failure in this sewer would have dire consequences for a wide area, not to mention Site 1 which contain a basement type feature cut into the embankment. The FRA does not assess residual risks associated a failure or collapse in the sewer during construction or at some point in the future as its condition deteriorates over time. Thames Water have raised concerns with the proximity of the proposed dwellings and have highlighted Piling operations and the removal of cutting into the embankment as factors that may impact on the structural integrity and accessibility to the sewer, which is located 7m in depth. The need to divert this sewer would have significant cost implications and programme delays and therefore is material to the economic viability of the proposals and the programme for the construction works. It is considered material in planning terms, given the sensitivity of the sewer and the need to divert existing operational connections serving the estate, that sufficient detail is provided in order to inform the Construction Management Plan and scheme economic appraisal.

Whilst the FRA cites references consultation with the Tenants Association on the occurrence of historical flooding within the environs of the estate, it should be noted that during even frequent rainfall events, the gully serving the existing block paving area adjacent to Site 3 is often overloaded resulting in ponding. This is likely to be due to surcharging of the drainage system that connects into the deep combined sewer. Given the threshold level of properties located within Sites 1,2 and 3 are at grade with external levels, the impact of backing up in the sewer system is material and may give rise to the need to ensure that ground floor is made flood resilient and features such as non return valves required on sanitary drainage for the Site 1,2 and 3 properties. All of the existing properties connecting into the same pipe run at

Are located at least 2m above (1 storey) the proposed dwellings and therefore have more driving pressure to reduce the risk of backflows. Ground floor habitable accommodation is therefore at residual risk of surface and sewer flooding.

The presence of the redundant culverted watercourse identified within the FRA may also be a potential abnormal costs and future liability to the proposed dwellings if the nature of the backfill material is not determined prior to construction, and again should be confirmed as part of the planning application.

Tree T33 has a root zone that is highlighted as encroaching under the corner of 72 Kiln Place. The foundation design for the proposed dwelling forming Site 3 are not specified within the submission documents. It is anticipated that the existing blocks have piled foundations, there is no consideration of the potential for differential settlement to occur as a result of the construction of the new properties. Geotechnical data is available and therefore potential impacts should be considered provided to confirm that the proximity of construction activity directly adjacent to the existing blocks will not result

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in detriment to the super structure/ sub structure.

The programme contained within the construction management plan indicates that the enabling works will have a duration of 3months, whilst the construction of the sub and super structure of the new dwellings will have a duration of approximately 6mths. Given the potential for significant diversions, the duration of enabling works is deemed unrealistic and it is likely to extend considerably, particularly if remediation works is required as well as the diversion of the deep sewer, existing foul sewer connections and heating pipes etc.. The overall duration of 1 year could be considerably increased, exposing residents to prolonged construction impacts causing detriment to their quiet enjoyment of the estate.

Construction works associated with site 3 will have the most direct impact on 72 Kiln Place, resulting in noise and dust issues. It is noted that the CMP contains proposals for the inclusion of measures to control these construction impacts, however, given the proximity of the site to my property, it is inevitable that air and noise pollution will occur when opening windows within my property during site operations.

As part of the CIP there is a significant amount of development either consented/in progress or planned within the local area. Intensification of development through the construction of 15 units, on an already dense existing housing estate containing 164 dwellings will result in significant disruption during construction, reduction in parking and introduces new properties within areas that could be affected by residual flood risks arising from sewer overloading/failure and surface water. The abnormal costs associated with diversions, which will form part of the enabling work required to deliver a total 15 units, coupled with loss of parking serving 164 dwellings, mean that the viability, both economically and environmentally sustainable is arguable.

I trust the above comments will be taken into consideration when determining the planning application, and particular the principle of infill development at Kiln Place. If, in the event that the scheme is granted under delegated authority, regardless of this letter of objection, I would request that suitably worded conditions are applied to the consent to ensure that issues identified above are further clarified/addressed through reserved matters applications to discharge respective conditions.
