

Date: 2nd September 2014
Our Ref: 2014/1495/P

Contact: Rachel English
Direct Line: 020 7974 1343
Email: Rachel.english@camden.gov.uk

Isaac Hudson
MA Consulting Engineers
Foundation House
4 Percy Road
London
N12 8BU



Development Management
Planning Services
London Borough of Camden
Town Hall
Argyle Street
London WC1H 8ND

Tel 020 7974 4444
planning@camden.gov.uk
www.camden.gov.uk/planning

Dear Sir,

Request for independent assessment of Basement Impact Assessment for planning application 2014/1495/P at 9-11 Mansfield Road, London, NW3 2JD

The Council is seeking an audit of the submission documents for compliance with a Basement Impact Assessment and a view on the technical sufficiency of the work carried out and assessment of the completeness of the submission for the planning application (2014/1495/P) at 9-11 Mansfield Road, London, NW3 2JD.

Camden's supplementary planning guidance for basements (CPG4 – Basements and lightwells) has recently been updated. Previously, the Council only requested independent assessment of Basement Impact Assessments when it had received a detailed objection from a relevantly qualified engineer/hydrologist/hydrogeologist working on behalf of an adjoining occupier. The guidance, which was adopted in September 2013, now requires independent assessment for basement development where:

- A matter of concern has been identified which requires the preparation of a full BIA;
- Where the proposed development is located within an area of concern regarding slope stability, surface water or groundwater flow; or
- For any other application where the Council feels independent verification would be appropriate (e.g. where conflicting evidence is provided in response to a proposal)

Background

A planning application (2014/1495/P) for "Erection of a part two storey, part three storey plus basement building to accommodate 4 x 2 bedroom flats, following the demolition of existing house (Class C3)" at 9-11 Mansfield Road has been submitted to the London Borough of Camden.

In respect of seeking to provide sufficient justification for the proposed basement excavation this application was submitted with a Basement Impact Assessment (BIA) by Rambolls.

During the consultation period objections were received by local residents including a technical report produced by Stark Associates Consulting Engineers on behalf of the residents. As we have received this technical

objection and as the site lies within an area of constraint (surface water flow and flooding), an independent verification is required in line with Camden Planning Guidance.

Assessment

The planning application will be assessed in terms of primarily LDF policy DP27 (but also including CS5, CS14, CS15, CS17, CS18, DP23, DP24, DP25 and DP26 – as stated at paragraphs 1.5 and 1.6 of CPG4) but with close reference to the procedures, processes and recommendations of Camden Planning Guidance 2013 (CPG4 – Basements and lightwells) and the associated Camden Geological, Hydrogeological and Hydrological Study – Guidance for Subterranean Development 2010 (referred to hereafter as the “Arup report”).

The LDF can be downloaded from the following link:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf-/>

CPG4 can be downloaded from the following link:

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

The “Arup report” can be downloaded from the following links:

www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2465490
www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2465491
www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2465492
www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2465493
www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2465494
www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2465495

In order to present a recommendation for approval to Members at a Member’s Briefing I would need to be certain that:

1. The submission contains a Basement Impact Assessment, which has been prepared in accordance with the processes and procedures set out in Camden Planning Guidance (CPG4).
2. The methodologies have been appropriate to the scale of the proposals and the nature of the site
3. The conclusions have been arrived at based on all necessary and reasonable evidence and considerations, in a reliable, transparent manner, by suitably qualified professionals, with sufficient attention paid to risk assessment and use of conservative engineering values/estimates
4. The conclusions are sufficiently robust and accurate and are accompanied by sufficiently detailed amelioration/mitigation measures to ensure that the grant of planning permission would accord with DP27, in respect of
 - a. maintaining the structural stability of the building and any neighbouring properties

- b. avoiding adversely affecting drainage and run-off or causing other damage to the water environment and
- c. avoiding cumulative impacts on structural stability or the water environment in the local area

We are looking for a third party independent assessment because the site lies within areas of constraint for land stability, and surface water flow and flooding and we have received a technical objection to the BIA.

I would be grateful if you could please review, assess and provide a report to the Council detailing your findings in relation to points 1-4 above.

Please also provide precise details of the timeframes in which this report will be produced and submitted to the Council. I am anticipating that this report should take no more than two weeks to prepare.

For completeness please ensure that the report details your own professional qualifications as well as other authors. Note that CPG4 requires the following qualifications for different elements of a Basement Impact Assessment study or review.

Qualifications required for assessments

Surface flow and flooding	<p>A Hydrologist or a Civil Engineer specialising in flood risk management and surface water drainage, with either:</p> <ul style="list-style-type: none"> • The “CEng” (Chartered Engineer) qualification from the Engineering Council; or a Member of the Institution of Civil Engineers (“MICE); or • The “C.WEM” (Chartered Water and Environmental Manager) qualification from the Chartered Institution of Water and Environmental Management.
Subterranean (groundwater) flow	<p>A Hydrogeologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.</p>
Land stability	<p>A Civil Engineer with the “CEng” (Chartered Engineer) qualification from the Engineering Council and specialising in ground engineering; or</p> <p>A Member of the Institution of Civil Engineers (“MICE”) and a Geotechnical Specialist as defined by the Site Investigation Steering Group.</p> <p>With demonstrable evidence that the assessments have been made by them in conjunction with an Engineering Geologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.</p>

I would also appreciate it if you could please confirm in your report whether you professionally or personally know the authors of the reports submitted (either by the applicant or objectors) or have been involved in the preparation of these reports in a manner which would call into question the validity of the independent assessment sought to be carried out. I would also ask you to confirm in writing whether there is any other conflict of interest (either know or are related to the agent or the developer).

I hope that this information is clear. Should you have any questions or queries please do not hesitate to contact me. Please can you send the quotation of costs for the above work and I will raise a purchase order. Please provide your confirmation and likely timeframes by **8th September 2014**.

I look forward to hearing from you.

Yours sincerely

(via email)

Rachel English
Planning Officer

Attachments to this letter:

Information submitted by the applicant

- Basement Impact Assessment (BIA) and associated documents by Rambolls dated 20th February 2014
- Other application documents can be found on our website [here](#)

Technical Objection

- Technical response to submitted BIA by Stephen Stark Associates