**Jonathan Braude & Yojana Sharma**

9 Antrim Grove, London NW3 4XP

Nanayaa Ampoma,

Planning Officer,

Regeneration and Planning,

London Borough of Camden,

Town Hall,

Argyle Street,

London WC1H 8ND

 November 30, 2014

Dear Ms. Ampoma,

Re: Basement Planning Application for 6, Antrim Grove, NW3 4XP (2014/3835P)

We are writing in response to your call for comments on the renewed application above.

It is not immediately clear from a quick examination of your website exactly what amendments have been made to the initial application of June 6 or whether the applicant has made any substantive changes to his plans that would require a reassessment or previous objections from neighbours including myself.

However, the Audit of Basement Impact Assessment by your consultants Geotechnical Environmental Associates, dated November 7, makes it abundantly clear that our previous concerns regarding the adequacy of the BIA’s consideration of the likely effects on the groundwater were fully justified.

In particular, we have been concerned about the direction of flow of groundwater, which has been described in the BIA as “perched water”, but which may be connected with the water which rises below nos. 1 and 3 Antrim Grove during and after wet weather. These are the houses directly opposite and downhill from no. 6.

The whole terrace from no. 1 to no. 9 Antrim Grove contributes to the maintenance of a pump which must be ready at all times to prevent water entering the basements at the beginning of the row. It is vital to know if the direction and volume of flow will be affected to the detriment of the whole terrace.

Perhaps the most telling comment in the Audit is buried in at the end of a section on groundwater flow (paragraph 2.6.2), scathingly criticising the attitude of the company that carried out the BIA, which seems to have put the cart very firmly before the horse.

 “There appears to be a fundamental misjudgement of the purpose of the assessment, in that the objective of the BIA is to ascertain the impact of the new basement upon the groundwater rather than the impact of the groundwater upon the new basement.”

However, the audit also makes a series of quite damning comments based on the detail of the documentation.

1. “The surface water and flooding part of the assessment should be undertaken by either a Chartered Civil Engineer or a Chartered Water and Environment manager (CWEM) as required in Section 2.45 of CPG4. There is no evidence of a person with such qualifications having provided input to this part of the assessment.” Section 2.3)
2. Camden’s Guidance for Subterranean Development, which is based on a report for the borough by Arup was not strictly followed in determining the direction of flow of the groundwater. The Audit says, that while it is “considered unlikely” that further boreholes would have indicated different information than that presented, had the protocols been strictly followed, “in the absence of monitoring standpipes there is no evidence to support that supposition. (2.4.1)
3. The BIA’s consideration of groundwater flow is based on the experience of “groundwater ingress” at nearby sites, (i.e. nos. 8 and 10), but the Auditors say it would have been “prudent” for additional monitoring to be carried out in the period leading up to construction and in particular during the wetter winter months. However they do concede that the company that carried out the BIA, Knapp Hicks and Partners Ltd., (KHL),expects that sump pumping is likely to be required and recommends trial holes to establish inflow rates.
4. The site investigation has not “confirmed the nature and depth of the foundations of the existing property.” The Auditors add that: “this is considered to be a major shortfall in consideration of designing underpins.” (2.4.1)
5. The Audit queries the state of the soil recorded in the text of the BIA, which it suggests is inconsistent with the readings taken. (2.4.1).
6. It considers the BIA may have been drawn up according to outdated and less demanding guidelines which were revised in 2013. (2.6)
7. KHL notes that the party wall with no.4 Antrim Grove will have to be underpinned, but does not give details of the construction plans.
8. Inadequate assessment has been made of the impact of seasonal swelling and shrinking of the soil and the result of heave on neighbouring properties.

It is therefore vital that a new and detailed BIA is carried out, not only according to the Borough’s guidelines and legal requirements, but also with a view to deciding the impact of construction on the properties opposite and downhill from no. 6 Antrim Grove as well as those on either side.

Until that is done satisfactorily, we have no choice but to maintain our objection to the basement plan.

Yours Sincerely,

Jonathan Braude

Yojana Sharma