Flat 5, 10 St George's Terrace
London, NW1 8XH
[redacted]

David Peres Da Costa
Regeneration & Planning Development Management
London Borough of Camden
Town Hall
Judd Street
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Dear Mr Peres Da Costa

Application Ref: 2014/7274/P, Associated Ref: 2014/7336/L

I have serious concerns about this application, as do many of my neighbours, both from the perspective of being a leaseholder of Flat 5, 10 St George's Terrace, and as a shareholder in Fortgrade, which owns the freehold of Houses 2, 4, 5, 9 & 10. Furthermore, under the lease terms, Houses 9 & 10 are treated as a single house, as the floors of one house overlap with the other and some rooms sit within both houses. This means that, when there is work to the fabric of house 9 or 10, I am responsible for part of that cost.

Whatever financial assurances might potentially be given by the flat leaseholder of Basement, number 9, it would prove difficult to get full reimbursement for long term damage to the houses, including its impact on insurance and ability to re-sell. For myself, and for most others in the houses, this is my main financial asset.

In terms of potential damage to the houses the documents that accompany the planning application (henceforth "documents") already provide much to concern me and a serious omission in the information further increases my concern.

A) Subsidence Risk

The submitted *GroundSure Geoinsight Report*, Section 4, tackles Natural Ground Subsidence risk. In 4.1 they show the "*Shrink-Swell Clay Map*" (document Page 22) and attach a hazard rating of "Moderate"; this is the second highest of the six hazard ratings, which are: No Data/Null, Negligible, Very Low, Low, Moderate and High. Page 28 expands on this and also refers to the risk on the insurance front. It is worth noting that in the Overview on Page 6 most risks are negligible, or very low, whereas subsidence scores as "Moderate".

GroundSure EnviroInsight Report: Section 8 of the Overview tackles Natural Hazards and asks "What is the maximum risk of natural ground subsidence?" and the response is Moderate, as is the "Shrink-Swell" hazard rating. Page 41 expands upon this including a reference to rising insurance costs.

Green Structural Engineering Ltd's *Basement Impact Assessment* states *"in the proposed scheme the only impact of any significance on the adjacent properties will be on the rear wall of the mews properties, which it is to underpin"* (section 3) yet the meat of argument seems really to be "trust us": Section 11. ..."*The critical stage of the works in relation to the effect on the neighbouring properties will be during construction of the extension. The major risk of movement during this stage of the works can be reduced and controlled by the appointment of a contractor with previous experience of basement construction who follows an agreed method of working incorporating all necessary temporary works.*"..."*The impact of any settlement on the existing properties will be minimal. In our experience on similar projects, we have been involved in over 80 basement projects across London including several in The London Borough of Camden, the movement may lead to some slight distortion and hairline cracking, but this can be dealt with by local redecoration.*"...*12. There will be local issues associated with stability during the excavation stage, but these will be mitigated by ensuring a temporary works strategy, such as above, is followed and all necessary temporary works installed to maintain stability of the excavations during the works"* (underlining is mine).

This section seems to be more of a marketing document – there will be issues but we can deal with them – than a reassurance. Reading further the London Clay is a real issue, being subject to seasonal movements, which the documents disclose have not been measured, and which *"will also swell when unloaded by excavations such as those required for the construction of basement"* (see Chelmer report).

Apart from the many problems with basement works across London, we have experience in our own road – the one other such project, at no 3, caused problems – these included the breaking of the damp-proof course in number 4 (which was subject to a party wall settlement) and the sinking of the steps of number 4 and many other issues up the Terrace.

The nervousness I have about this application has been exacerbated by the discovery of a really important omission in the subsidence assessment. The Green Structural Engineering document (section 5). states: "*reference to bomb damage records indicates that the nearest bomb site to be Chamberlain Street, NW3 3AJ, approximately 125m to the north*" This in itself contradicts another document - the Chelmer Consultancy Services report (Section 2.7) which states "*a high explosive or incendiary bomb landed just to the south-west of No. 9 on the edge of the park.*"

However the London County Council Bomb Damage Maps 1939-45, map 38, which experts tell me is the bible of bomb damage, shows serious bomb damage to the houses at the top of St George's Terrace, including 9 & 10. In fact, beyond number 11 houses were demolished in what is now the site of HillView. Surely this is relevant information in assessing subsidence risk.

The application assumes that neither tunnels nor streams or rivers are an issue, of which I am slightly dubious. The documents indicate that there are no rail tunnels or other such tunnels beneath, the latter not having been verified. Whatever the exact location of any tunnels, I regularly experience a mild shaking of the floor for 10 to 20 seconds in my top floor flat in no. 10, and I assume that must be related to train movements below or nearby, something neighbours also experience. Past residents have also talked of a stream under the houses, although I cannot verify that. These are worthy of greater investigation.

B) Water Run-off and Ingress

The Chelmer report makes specific reference to these issues in Section 7.4.2: "*drainage route from basement roof terrace and courtyard will remain as per existing route for the rear garden*". However, Section 8.4.3 states that the increase in hard surface areas *"may increase flow rates to sewer, and thus increase the risk of flooding"* and offers only "mitigation". This is concerning given the almost universal acceptance that climate change is likely to lead to an increase in the frequency of severe weather events. In this context the loss of soft landscaping which could act as a temporary reservoir seems a risk.

In any case, this deals only with the issue of direct pluvial water. The possibility of groundwater ingress (specifically for the proposed development) is clearly identified and addressed (Sections 10.2.5-6): "*the... extension will need to be fully waterproofed*" and *"designed to resist the buoyant uplift pressures which would be generated by groundwater at ground level"*.

In other words, more or less porous Made Ground and London Clay will be removed and replaced with an impervious block. Common sense tells us that pluvial water which would currently seep away and then flow through this ground will therefore be diverted, possibly into neighbouring basements or foundations. There is a heightened risk of flooding already known: Chelmer (Section 5.8) states that modelling shows "*an area of 'Medium' risk of flooding for the lower ground floor of one of the properties towards the west end of St. George's Terrace*". The precise property cannot be identified, though it seems to me irrelevant whether this is No. 9 or a neighbour. Significant soakaway routes will be lost.

The change in water flow may not only cause water ingress but also present a risk to neighbouring structures and foundations due to the levels of sulphate and (possibly) selenite found in samples. These are summarised in Chelmer Section 9.12.4: "*The chemical tests recorded potentially aggressive ground conditions...*"

C) Loss Of Gardens

I am also concerned that this permanently condemns the garden to being predominantly concrete and despite references to reinstating the garden the drawings submitted show very limited greenery and the Chelmer document refers to "*increased hard surfacing*". As a co-owner of the whole house I feel a garden is an asset that benefits all who live there. It is sad that number 9 garden is already mainly terrace, appoint the applicant could well make, however this construction would enshrine that loss of garden.

Local conservation crusader Diana Gurney, who just died in her 90s, always asked "why can't people who want a big house buy one?" To be honest that is what many of us feel. There is serious risk, with no reward, for a neighbour/co-owner like myself and, despite admiring the audacity of the project, I object to this application.

Yours sincerely

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Lucy Cottrell