

27 Laurier Road London NW5 1SH

5 March 2015

For the attention of Simon Vivers  
Planning Officer  
London Borough of Camden  
5 Pancras Square N1C

Planning application 2015/0369/P

Please find enclosed my comments (4 pages) on the  
above application concerning 44 Dartmouth Park Road  
NW5 1SN.



Mr K.W. Blyth

## **COMMENTS ON PLANNING APPLICATION 2015/0369/P**

### **re 44 DARTMOUTH PARK ROAD**

from

Mr Kenneth Blyth, 27 Laurier Road NW5 1SH.

Tel [REDACTED] Email [REDACTED]

I object to the application's proposals for the excavation and construction of a lower ground floor. My objections relate mainly to the Basement Impact Assessment contained in the application. The Assessment is based primarily on desk research alone. There appears to have been no attempt to draw on local knowledge, no thorough investigation of the site itself, and insufficient knowledge of the features of neighbouring houses.

#### The Assessment's conclusions

(i) One of the conclusions, set out on page 15 of the Assessment report, is that groundwater is not expected to be encountered. That expectation is not confirmed by local experience. My own cellar has flooded following heavy rain, and so have others in the area.

(ii) A second conclusion is that the basement will be constructed "within the stable London Clay". Whatever the characteristics of London Clay, a number of houses in the area, including my own, have suffered from subsidence.

(iii) The final conclusion of the report is that, since groundwater flow would not be expected within the London Clay, "it is expected that the cumulative impacts from the construction of the basement may be negligible". That expectation is inconsistent with local experience. The conclusion is prefaced by the statement that there are no recorded basements directly adjacent to the proposed basement. Unless cellars are not counted as basements, the records consulted in the course of the Assessment were faulty.

#### Other points

(iv) What the report says about the course of the old Fleet river is contrary to the information given in the Geological Survey map of the area.

(v) Some of the answers the report gives to questions asked in Camden's Planning Guidance publication CPG 4 *Basements and Lightwells* are wrong; others are questionable. Details are given in an Appendix to these comments.

(vi) A shortcoming of the application itself is that it says nothing about measures that would be taken to minimize the noise and disruption caused by the excavation and construction work.

Attached: Appendix

## APPENDIX TO COMMENTS – THE REASONS FOR OBJECTIONS

1. Subsidence and the flooding of basements following heavy rain are both typical of the area. On being told the post code, insurance companies now decline to include cover for subsidence in the policies they offer. The incidence of cellars flooded by rising water, as opposed to flooding from above, is common, though it follows no clear pattern, with properties higher up in a road sometimes being affected when those lower down are not.

### Answers given in the Assessment to questions asked in the Camden Planning Guidance publication CPG 4 Basements and Lightwells.

2. The questions asked in CPG 4 require the answer No, Yes, or Unknown. A 'Yes' or 'Unknown' answer indicates that a problem is identified and that further investigation is required. Some of the Assessment's 'No' answers should more probably be 'Yes' – as detailed below.

### Answers to questions in Figure 1 of CPG 4.

3. The questions asked in Figure 1 on page 17 of CPG 4, include: (1a) Is the site located directly above an aquifer? (1b) Will the proposed basement extend beneath the water table surface? (2) Is the site within 100m of a watercourse, well (used/disused) or potential spring line? (6) Is the lowest point of the proposed excavation (allowing for any drainage and foundation space under the basement floor) close to or lower than, the mean water level in any local pond or spring line? On pages 10-11 of the Assessment report, the answer 'No' is given to all those questions.

4. In view of the risks of basement flooding known to local residents, the 'No' answers to questions (1a), (1b) and (6) are not convincing. Whether basement flooding is due to the existence of an aquifer or to changes in the height of the water table is not for a layman to say. But flooding occurs. As for question (2), the answer 'No' is linked to the statement, in section 2.8 of the report, that the site lies approximately 115m to the east of the historical River Fleet. That statement appears to be based on the small-scale sketch map at the end of Nigel Barton's *The Lost Rivers of London*. The six inches to the mile Geological Survey of England and Wales Edition of 1920, revised and published in 1934, differs from that. The Survey's London Sheet N II SW shows the line of the Fleet crossing the north-west corner of the garden of 44 Dartmouth Park Road, having crossed Laurier Road near number 25. An enlarged copy of the relevant section of the Geological Survey map is attached to this Appendix. (The section copied shows the river named as the 'Holeborne'. The full description on the complete map is 'Holeborne or Fleet Brook'.)

### Answers to questions in Figure 2 of CPG 4

5. The questions asked in Figure 2 on page 19 of CPG 4 include: (7) Is there a history of seasonal shrink-swell subsidence in the local area, and/or evidence of such effects at the site? (8) Is the site within 100m of a watercourse or a potential spring line? (10) Is the site within an aquifer? If so, will the proposed basement extend beneath the water table such that

dewatering may be required during construction? (12) Is the site within 5m of a highway or pedestrian right of way? (13) Will the proposed basement significantly increase the differential depth of foundations relative to neighbouring properties? Pages 11-13 of the Assessment report give a 'No' answer to each of questions (8), (10) and (12). Its answer to (7) is 'Unknown', and to (13) is 'Yes'. The reasons for questioning the 'No' answers to questions (8) and (10) are as in paragraph 4 above. The answer 'No' to question (12) appears to be a straightforward mistake, since the west side of the site is right up against the pavement of York Rise.

#### **Construction management**

6. A rough calculation based on the drawings submitted in the application indicates that more than 300 cubic metres of material would need to be excavated and removed from the site if the proposed lower ground floor was to be constructed. CPG 4 states that when basement works are proposed in a conservation area (as is the case with the present application) a management plan will be required for demolition and construction. There is no sign of any such plan in the present application, and there is no account of steps that would be taken to minimize noise and disruption.

Attached: enlarged extract from Geological Survey map 1920, revised 1934.



