ELIZABETH AND PHILIP BECKMAN

7 REDINGTON GARDENS NW3 7RU

[redacted]

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London Borough of Camden
Regeneration and Planning Development Management
Town Hall Judd Street
WC1H 8ND

Objection to planning application 2015/3004/P (By e-mail) 3rd[nd] August 2015

No. 36 Redington Road NW3 7RT

We live at 7 Redington Gardens London NW3 7RU which is on the corner of Redington Road and is immediately next to 36 Redington Road and we object to the proposed development for the following reasons:

The Unsuitability of the proposal for a Conservation Area

Clause 3.2.4 of the Developer's Design Statement acknowledges that mature trees and dense vegetation with gardens characterise this conservation area. There will be very little of this on the site when the development is completed.

The two modest semi-detached houses on the site of 36 and 38 (38 has already been replaced) which had good sized front and rear gardens are being replaced by two massive buildings squeezed together on to a small site.

The architectural features of the proposed building may have fitted into the conservation area if it was a detached house on a larger plot with plenty of open space but looks incongruous as one of a pair of semi-detached. It is too large for the site and leaves little room for greenery and taken together with the even larger building on 38 will give the appearance from the street of one rather odd oversized building virtually unrelieved by greenery.

Whatever the architectural merits of the original buildings on the site the proposed development does not preserve or enhance the contribution of the site to the conservation area.

The proposed development would together with 38 alter the character of this part of Redington Road to its detriment

Risk of Damage to our Property

We attach comments on the BIA from two consultants, one on the Groundwater and Surface water aspects and one on Ground Stability.

With regard to the Ground Stability report the consultants have identified five areas where further information is required.

On point No. 1 the site could clearly be described as being in a hillside setting and we would ask that further investigation of the topography of the area should be provided.

The Report on Surface and Ground Water points out various unanswered or incomplete answers to enquiries. It also recommends a Flood Risk Assessment and an assessment of surface water disposal off site as well as monitoring of groundwater

levels during construction. From personal knowledge the drains on the corner of Redington Gardens and Redington Road are already often blocked and overflowing. The additional hardstanding will exacerbate the situation even more.

The report also highlights the necessity to ascertain the course of the River Westbourne. The BIA states that a tributary of this river is located within 50m of the property based onFigure 6 in the Camden "Guidance for subterrancan development (ARUP 2010) However Figure 2 in the same guidance document is more detailed than Figure 6 and indicates that the tributary actually runs through the property. We are sending a copy of Figure 2.

The possible impact on Surface Water, Drainage and Groundwater levels and flow is a source of serious concern.

It is clearly essential that before any decision is taken this question as well as the other points raised should be answered and an independent BIA produced to check the findings and the conclusions of the reports provided and to fill in any gaps.

Camden's Planning Guidance state that the Council will only permit basement and underground development that does not cause harm to the built and natural environment or that results in flooding or leads to ground instability. We submit that this test has not been passed.

The application should be rejected if there is any chance of there being harm to our property or a radical change in water flow or water table.

Protection of Trees

We are particularly concerned as to the trees on our property on or near the boundary with No. 36, in particular the three lime trees numbers 5, 7 and 9 on the plan attached to the tree report . No.9 is a category A tree and has a TPO. 5 and 7 are category C and at least one of these we believe also has a TPO. We do know that we cannot touch any of the trees in our garden without consulting a Camden Tree Officer.

We note the comments and recommendations in the tree report. We believe the developer's proposals have been modified and the basement reduced partly to take into account the likely effect on the trees of the proposed works in particular the basement but we are concerned that the modifications have not gone far enough.

The trees are vey near to the area to be excavated and the root protection areas go even closer. The developers intend to cut branches and even roots which intrude into no. 36. and want to prune tree no.9 .

The passage between our boundary and the new development down which, once the basement is excavated, all the plant and materials will pass to the open area at the rear, is only 1.3 metres wide. The tree protection barrier would make it even narrower. In this scenario there must be a real risk of damage to the trees. The tree most exposed is the A tree

It is essential that one of the Council's tree officers is asked at this stage, before any decision is taken on the application to look into the acceptability of the proposals and the adequacy of the recommendations and their likely impact on the trees.

Should permission nevertheless be granted it is of course vital that suitable conditions are inserted in the permission so that the developers have an obligation to put in place the recommendations for protecting the trees and ensure that they are properly supervised.

We remain to be convinced that sufficient steps can be taken to safeguard the trees and this is a further reason why the application should be refused.

Site Works

As is acknowledged by the Construction Method Statement, the site will be a very difficult one to manage but little thought seems to have been given to the particular problems that this site presents. This is a small site and construction work will be carried out on a good part of it, especially at the front. There will be little room to manoeuvre vehicles and plant in and out. The only passage to the rear, as stated above is very narrow. It is likely that this will result in lorries being parked on the street and materials stored there. A large amount of earth and rubble from the demolition and excavation will have to be removed from the site. The works are likely to result in substantial nuisance being caused to the neighbouring houses and the general public.

Noise
The nature of the car lift has not been specified. This may cause a noise nuisance. If this is approved it should be subject to suitable conditions.

Please reject this application.

Philip & Elizabeth Beckman
7 Redington Gardens
London
NW3 7RU

31 July 2015

Our Ref: 64035R1.docx

Dear Mr and Mrs Beckman,

Re: Review of Basement Impact Assessment (surface water & groundwater) for 36 Redington Road London NW3

Thank you for inviting ESI to review the current Basement Impact Assessment (BIA) for 36 Redington Road ("The property") compiled by Southern Testing, reference J11894, dated May 2015. The BIA report is divided into Stages 1 & 2 (Screening and Scoping) (referred to as "Report A") and Stages 3 & 4 (Site Investigation / Impact Assessment) (referred to as Report "B").

This letter considers the surface water and groundwater elements of Report A and B of the BIA. The land stability elements are considered in the letter from Key Geosolutions.

Camden Council uses an audit form (Table 1 below) to track the items required for submission as part of a BIA and we have used this as a template for assessing the BIA for 36 Redington Road. We have also considered the information provided in the Camden geological, hydrogeological and hydrological study (ARUP, Nov 2010).

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Table 1 BIA components for Audit (Camden Council 2015)

Item provided for Camden audit		ESI Comment
1	Description of proposed development.	The proposed development is described as "three-storey including a single level basement", however the referenced plan shows a three-storey above-ground development, with a single-level basement below.
2	Plan showing boundary of development including any land required temporarily during construction.	Figure 1 in Report A
3	Plans, maps and or photographs to show location of basement relative to surrounding structures.	Figure 4 in Report B
4	Plans, maps and or photographs to show topography of surrounding area with any nearby watercourses/waterbodies including consideration of the relevant maps in the Strategic FRA by URS (2014)	The property appears to be located directly above a tributary of the historical River Westbourne according to Figure 2 of ARUP (2010). Report A describes the tributary as within 50m of the property. There is no consideration of the relevant maps in the Strategic FRA by URS (2014).
5	Plans and sections to show foundation details of adjacent structures.	NA – see Key Geosolutions Letter
6	Plans and sections to show layout and dimensions of proposed basement.	These do not appear to be included in either Report A or B. There is no figure with the depth or area of the proposed basement within the BIA; however there are plans and sections submitted separately on the Camden Council planning portal, which show these parameters.
7	Programme for enabling works, construction and restoration.	NA – see Key Geosolutions Letter
8	Identification of potential risks to land stability (including surrounding structures and infrastructure), and surface and groundwater flooding.	NA – see Key Geosolutions Letter
9	Assessment of impact of potential risks on neighbouring properties and surface and groundwater.	The assessment for surface water at Stage 1 (Report A) determines that 3 issues should be taken forward to Stage 2. These are a) Changes to surface water flows as part of site drainage b) Change in proportion of paved areas c) Risk from surface water flooding Only (a) and (c) are listed in Stage 2 in Report A, however none are assessed after Stage 1 to

		determine the scale of the potential risk. A site specific Flood Risk Assessment (FRA) is recommended in Section 6 of Report B but does not appear to have been completed. A site drainage assessment is also recommended in Section 6 of Report B but does not appear to have been completed. The assessment for groundwater at Stage 1 (Report A) determines that 4 issues should be taken forward to Stage 2. These are a) The site is above an aquifer b) The proposed basement extends below the water table c) The site is within 100m of a watercourse d) Change in proportion of paved areas Only (a) and (b) are listed in Stage 2 in Report A, and only these two are assessed further in Stage 4 (Report B); a computer model is used to assess the potential impacts on groundwater flows and levels. This concludes that the potential impact on 7 Redington Gardens would be a rise of less than 2cm in the groundwater level. This is likely to be within any seasonal variation in local groundwater levels.
10	Identification of significant adverse impacts.	In Section 6 of Stage 3 (Report B) the site is described as being situated in an area considered at low to high risk of surface water flooding. No other significant adverse impacts are identified for surface water or groundwater.
11	Evidence of consultation with neighbours.	None in BIA
12	Ground Investigation Report and Conceptual Site Model including - Desktop study - exploratory hole records - results from monitoring the local groundwater regime - confirmation of baseline conditions - factual site investigation report	Included in Report B
13	Ground Movement Assessment (GMA).	NA – see Key Geosolutions Letter
14	Plans, drawings, reports to show extent of affected area.	Potential affected area by surface water flooding not identified Computer model output indicates area of impacts to groundwater levels

15	Specific mitigation measures to reduce, avoid or offset significant adverse impacts.	A Flood Risk Assessment is required to identify mitigation measures to offset potential surface water flooding.
16	Construction Sequence Methodology (CSM) referring to site investigation and containing basement, floor and roof plans, sections (all views), sequence of construction and temporary works.	NA – see Key Geosolutions Letter
17	Proposals for monitoring during construction.	None in BIA; groundwater levels should be monitored during construction and if the impacts are different from those predicted in the BIA then the conclusions of the BIA should be reassessed.
18	Confirmatory and reasoned statement identifying likely damage to nearby properties according to Burland Scale	NA – see Key Geosolutions Letter
19	Confirmatory and reasoned statement with supporting evidence that the structural stability of the building and neighbouring properties will be maintained (by reference to BIA, Ground Movement Assessment and Construction Sequence Methodology), including consideration of cumulative effects.	NA – see Key Geosolutions Letter
20	Confirmatory and reasoned statement with supporting evidence that there will be no adverse effects on drainage or run-off and no damage to the water environment (by reference to ground investigation, BIA and CSM), including consideration of cumulative effects.	None provided in BIA
21	Identification of areas that require further investigation.	A Flood Risk Assessment is recommended, no other areas in respect of surface water or groundwater are identified as requiring further assessment. See response to item 9 for items that have not been resolved after Stage 1
22	Non-technical summary for each stage of BIA.	An overall summary is provided at the start of Report B

Summary

We can confirm that the questions from the Camden Planning Guidance (CPG4) relating to subterranean (groundwater) flow and surface water have been adequately addressed and answered correctly at Stage 1 Screening. Not all the potential issues identified appear to have been taken forward to Stage 2 Scoping, or further.

Surface Water Issues

An FRA is recommended to consider the potential risks from surface water flooding. This should be completed and include consideration of the Strategic FRA by URS (2014); it should be submitted to Camden Council before any decision is made on the proposed development.

An assessment of surface water disposal off-site is required as identified in Stage 2 Scoping of Report A.

The location of the historical course of the River Westbourne should be confirmed as it may impact on surface water drainage as well as groundwater levels and flows.

Groundwater Issues

The proposed basement will extend through the water table into the underlying London Clay. Impacts to groundwater flows and levels are assessed as being negligible. As assessed the changes are within typical seasonal variations in groundwater levels. Additional monitoring should take place during the construction phase to ensure the on-site conditions are within the ranges predicted in the BIA. There should also be consideration of the changes in paved areas with regard to local groundwater levels and flows.

[redacted]

Joe Gomme (CGeol)

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