

24 John Street,
London WC1N 2BH
2nd February 2016

Dear Sir,

Planning Application 2014/3330/P - 13-15 John's Mews

We write to object to this application in relation to the further revised plans and Basement Impact Assessment (revision 5) ("the BIA") recently shown on Camden's planning portal.

First, we consider it procedurally improper for yet another new scheme to be advanced at a time when this matter is already being considered by the Development Committee on the basis of a different set of plans.

Secondly, the new BIA continues to refer to erroneous factors (see, for example, paragraphs 10.2.10 and 10.4.16) despite those having been drawn to the attention of the authors on the last review of the BIA. This, and the matters identified in the next few paragraphs, suggests that the BIA is not being re-evaluated comprehensively on each revision and we are therefore unclear as to which parts of the BIA are current and which are now merely historic.¹

Thirdly, paragraph 3.4 identifies the depth of excavation required as being 4.2 metres BGL, yet the passage dealing with Basement Geometry and Stresses (at paragraph 10.5.1 et seq) continues to rely on the out of date figure of 3.8 metres that was originally given in BIA revision 1 in September 2014, despite that scheme long since having been superseded. This suggests to the reader that parts of the report, including material calculations, have not been re-worked or checked. Indeed Table 2 at paragraph 10.5.1.2 is identical in revision 5 to that produced for revision 1, despite the changes in the scheme in the meantime.

Fourthly, the calculation of the Burland Category in paragraph 10.4.9 is calculated on the basis of an allowance for 2mm of heave, with that figure taken from paragraph 10.5, yet the 2mm allowance for heave referred to is the minimum projected heave identified in paragraph 10.5.3.3, whereas one might have expected the calculation to be undertaken by reference to the maximum projected heave, which is in the order of 9mm to the rear wall of our property, or at least to have discussed what would be the effect were the maximum projected heave to occur.

¹ The BIA also attaches (as Schedule C) drawings that were prepared for the original scheme that was abandoned as long ago as Spring 2015 (see the attachments at pages 63 to 66 of the document, part 1).

Fifthly, whilst paragraph 10.4.9 refers to the possible extent of the ground movements North and South of the site (to numbers 11 and 21 John's Mews) it conspicuously fails to mention that ground movements would, theoretically, also extend up to 16.4 metres East and West of the site, so as to give rise to movement not only under St George the Martyr Primary School to the West, but also under the main Georgian listed buildings on John Street.

There also seems to be an assumption that Georgian properties are equally as robust as the modern buildings adjacent to the site. We question whether this assumption holds good when calculating a Burland Category without considering the type of building affected by the angular distortion.

We also question whether a Burland Category is capable of such confident prediction in circumstances where the soil conditions are so inherently variable (see paragraph 10.4.13) such that "one SPT recorded a zero blowcount, which indicates extremely weak or voided conditions locally in the Made Ground" (paragraph 10.4.2). This reflects the fact that the ground investigated was so weak that no slide hammer blows at all were required to drive a thick walled sample tube 150mm through the ground upon which the applicant intends to build.

Further, paragraph 10.4.10 of the BIA confirms that best practice methods will be essential to ensure that ground movements are kept in line with even the optimistic predictions made in paragraph 10.4.9. We again observe that the applicant has not produced any Demolition and Construction Management Plans, far less plans sufficiently detailed as to give any confidence that construction will be carried out so as to achieve those predictions or avoid damage to property and local amenity during the demolition and construction phases.

No doubt the objections identified by us will be considered by Campbell Reith, as Camden's single framework provider for audit services, if or when this version of the BIA needs to be considered.

In any event, we continue to rely upon all objections previously raised, but still not addressed, such as divergence between the drawing of the rear elevation and the plan drawing, absence of seasonal water table measurements, no proper consideration of the effect of the construction on water flow and the consequences for nearby basements, absence of Demolition and Construction Management Plans, and absence of any consideration of the contaminated soil conditions or the circumstances in which a pungent smell was identified (paragraph 9.6 of the BIA) sufficient to warrant a recommendation that the basements be gas-tight (paragraph 10.2.7 of the BIA).

Yours faithfully,

Richard Morgan and Monica Coombs