From: **Freeney, Fergus** Fergus.Freeney@camden.gov.uk
Subject: FW: 2016/1372/P - advice please
Date: 7 April 2016 at 16:19
To: Planning DCMail@camden.gov.uk

FF

Hello could this be logged against this application as a comment – thanks.

From: McCarthy, Mark [redacted]
Sent: 07 April 2016 3:47 PM
To: Freeney, Fergus
Subject: RE: 2016/1372/P - advice please

Dear Fergus

I thank you for your full reply.

The British Geological Survey works with the UK Government (Business Information Modelling) and local authorities to encourage reporting borehole data. It is also a professional expectation that borehole data are voluntarily reported to BGS. The BIA was undertaken by two Chartered Geologists and Fellows of the Geological Society of London. Will you advise me if you will support good practice and will write to their company requesting that the findings be registered, since the report is already now in the public domain?

The BIA report sometimes says that the layer 1-3m bgl is 'Made Ground', but the EnviroCheck report states it is 'soft silty clay … and fine to coarse gravel', while the lower layer 3 - 8m has a band of gravel at 6m and also reports of shells. This is of geological importance for potential Palaeolithic findings in Kentish Town Archaeological Priority Area, and the samples deserve fuller analysis. I have written to Historic England for their consideration: please will you advise me on Camden's position? The Archaeological Report also recognised that further information on the borehole data would be beneficial.

The BIA report clearly finds running water, as could be expected close to the Fleet. It states that a 'secant bored pile wall' will be needed and describes possible foundations 'provided that groundwater inflows can be sufficiently controlled'. The BIA 'conclusion' that 'There is no significant risk of flooding from groundwater' is entirely dependent on the construction, as 'Groundwater … will flow around the basement'. Yet also 'a cavity drainage system within the basement has been incorporated as a form of mitigation'. Since the new flows around adjacent buildings are unpredicted, ground water is indeed a material issue. Similarly, the Map at BIA Part 6 shows the pavement of 152-156 Kentish Town Road to have 'medium' rather than 'low' risk: the design concept that the kerb would prevent flooding of surface water (para 17.5) seems improbable. (I see no response yet from Thames Water.) The Application Form incorrectly puts 'No' to the three questions asked in Section 12. Will you advise on Camden's view?

Will the proposed full basement impact significantly on the Northern line beneath? It is welcome that you wrote to London Underground, after I requested such information, and have yesterday posted their (quick) reply. LU say "**we do** have some concerns on the closeness of the piles to our Northern Line tunnels. These need to be clarified following surveys and review of predictions made within the Impact Assessment report in respect to the anticipated movement of the track, Tunnel assets." BIA Part 7 para 2.0 show the Underground lines and possible distances. Para 4.0 states 'contiguous bored pile wall to a depth of 9.0 m' bgl. Para 7.0 says that the 'piles will have to be expanded with sleeves' to limit pressure on the tunnel. All this information needs to be shared with London Underground, and a clear prior assessment

this information needs to be shared with London Underground, and a clear prior assessment made for the proposed basement construction. Please can the response from LU be shared with the public during the consultation period.

The Noise report lacks assessment of the Underground in the basement.

Last, what is the access to the basement? Only a 'potential' lift is shown within the stairs for the basement. There is no service lift for goods. Is a retail basement practical? No other shop in Kentish Town Centre has either retail or offices in the basement. (Kentish Town Neighbourhood Forum not listed as a Consultee.)

I suggest Camden should maintain the period of consultation until these concerns – archaeology, hydrology, Underground and amenity – are resolved, because the basement is a critical part of the scheme. I see no discussion of the basement in your Pre-Application report, and am grateful for your interest in these issues..

With good wishes
Mark McCarthy.

From: Freeney, Fergus [mailto:Fergus.Freeney@camden.gov.uk]
Sent: 06 April 2016 15:08
To: McCarthy, Mark
Subject: RE: 2016/1372/P - advice please

Dear Mark,

Thank you for your email. I apologise for not responding to you sooner, we had a problem between the planning portal (the website used nationally to upload planning documents) and our system which meant a number of documents were not transferred over. The Archeaological report has been uploaded along with a number of other documents.

With regard to your query on boreholes the applicants have responded as follows - we understand that there is no formal requirement to upload the borehole data onto the British Geological Society GeoIndex. *Geotechnical and Environmental Associates* undertook the borehole sampling who noted that the majority of the data uploaded onto the BGS database tend to be historic records or uploaded for and on behalf of local authorities. They use the borehole archive as a helpful resource when researching an area but noted that it was rare, to their knowledge, that any firms make their borehole records public in this way.

I trust that this helps, please note that the uploading of such data to the British Geological Society GeoIndex is not a planning consideration and will have no impact upon how we assess the application.

Kind regards,
Fergus Freeney

Senior Planning Officer

Telephone: 020 7974 3366

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From: McCarthy, Mark [mailto:[redacted]]
Sent: 29 March 2016 18:30
To: Freeney, Fergus
Subject: RE: 2016/1372/P - advice please

Dear Fergus Feeney

I thank you for quickly making the indicated reports available.
It is welcome to have your Pre-Advice as written material in the Design Statement.

I have not read all the posted material for 2016/1372/P yet, but I have three questions related to below-ground:

1. Where is the Archaeological Assessment?
2. Where is the report from London Underground Infrastructure Protection?
3. Why are the 2015 BIA bore hole data not registered on the British Geological Society GeoIndex

I look forward to your response to inform public consultation.

With thanks
Mark McCarthy

From: Freeney, Fergus [mailto:Fergus.Freeney@camden.gov.uk]
Sent: 29 March 2016 13:25
To: McCarthy, Mark
Subject: RE: 2016/1372/P - advice please

Dear Mark,

Thank you for your email, these documents have now been uploaded to our website.

Kind regards,

Fergus Freeney
Senior Planning Officer

Telephone: 020 7974 3366

You can sign up to our new and improved planning e-alerts to let you know about new planning applications, decisions and appeals.

From: McCarthy, Mark [redacted]
Sent: 29 March 2016 12:51
To: Freeney, Fergus
Subject: 2016/1372/P - advice please

Dear Mr Freeney

The proposals for 152-156 Kentish Town Road has recently gone on the public web page.

However there is no Design and Impact Statement (nor parts 1-2 for BIA)

Since this site has multiple planning constraints, please advise whether the registration is yet validly open for the consultation period.

With thanks
Mark McCarthy

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