

Dear Madam,

I note the application still has not been determined and I remain disappointed that this application has as yet not been rejected. Although the consultation period is over the constant revisions and comments that continue to be uploaded have prompted further comments which I hope you will consider.

The BIA Audit has identified the following issues which are relevant to the decision and in our view clearly show the extent of the proposed basement is wholly inappropriate for this site and can only be considered as gross over development:

Excerpts from The BIA are copied below:

1) The extent of the basement and the closeness to the four neighbouring boundaries is extreme and would be hugely disruptive to all the neighbours. In parts the contiguous piles are underneath the boundary walls/fences causing necessary disruption and the TPO protected tree needs branches cutting as it will likely clash with construction plant.

4.4. The proposed above ground building measures approximately 7m x 16m on plan which generally similar size to the existing building. The below ground works for the base however, measure approximately 12.5 x 16.3m on plan which is almost double the plan of the existing building. The excavation depth for the basement to the underside of basement is approximately 4.5m below the existing ground level. The new basement extends almost the whole of the existing plot right up to the boundaries with the adjacent property

4.14. The piles appear to be positioned directly under the existing boundary fences which will need to be removed to enable construction to proceed. The piling rig may also clash with the canopy of the London Plane Tree and Western Red Cedar and some lower branches may need to be removed.

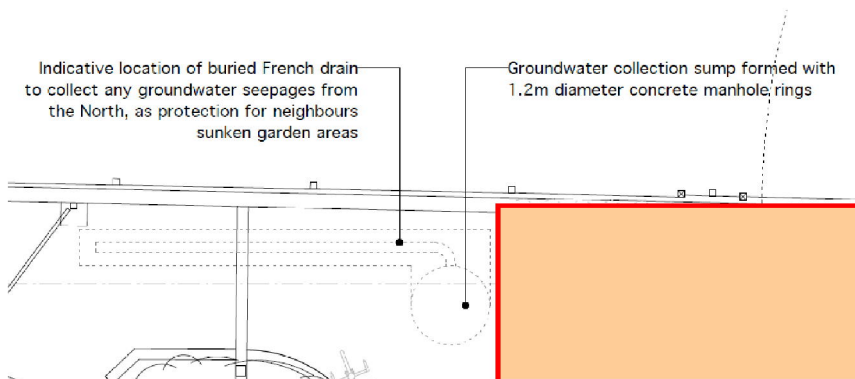
2) This proposed over development in such a confined site is gross and in an area that poses significant potential hydrology problems. How can the council even consider such a large basement build when hydrology reports express concern on the impact of neighbouring properties and also the design requires active mechanical sump pumps to deal with the issue. This in my opinion is the clearest sign that this is completely inappropriate.

4.19. Hydrogeology & Hydrology screening, scoping and mitigation measures have been included in the HBIA. The historic Shepherds Hill conduit (water course) used to run within 20-40m west of the site. It is acknowledged within the HBIA that the basement construction will increase below ground water levels and in view of this and the historic conduit, it is proposed to provide a drainage corridor, French drain and sump as mitigation measures.

5.9. The Historic Shepherds Hill conduit (water course) used to run within 20-40m to the west of the site. Based on this, the groundwater level identified in the borehole and the impermeable area, mitigation measures are proposed in the BIA and HBIA. These include the provision of a drainage corridor, French drain, sump and pump.

I am also shocked that a basement scheme that requires an external sump pump to protect neighbours' properties is still being considered! Please confirm what procedures are in place if the homeowners are away for an extended period and the primary and secondary pump fails (assuming there is a secondary backup pump although there is no indication). If the secondary also fails then what? Occupiers of 64 & 66 Fitzjohns have no right of access or means to address the failure. Another hypothetical scenario is whilst the homeowners are away their property suffers a power failure or a tripped fuse that puts the pumps out of action, then what.

It is inconceivable that the planning department can deem a basement scheme acceptable when it requires mechanical methods to prevent water ingress into neighbours' properties. Having to protect their own property with mechanical pumping is fair enough but the neighbours? Clearly this location and the proximity of the proposed basement to 64 Fitzjohns Avenue is unacceptable.



3) Horological Report:

The report is very clear in its assessment of the potential impact on neighbouring properties due to potential alteration of ground water flows and levels. If this is not exactly the sort of basement development that Camden policy should be seeking to prevent I don't know what is!

3.3.7 Groundwater Flooding

As discussed in Q1a of the Groundwater Flow Screening above, the available information indicates that groundwater levels in the Claygate Member sandy clay at the site are approximately 16.4 mASD i.e. at least 0.5m above the proposed basement floor level. As discussed in the Conceptual Ground Model in section 2.2.2 above, if in a very wet winter groundwater levels beneath the no.66 site rise to approximately 17.5 mASD, **it is theoretically possible (in the absence of mitigation measures) that the blockage of the groundwater pathway caused by the proposed basement could cause water levels to rise slightly and spill out onto the lower ground floor patio or southern sunken garden of no.62 Fitzjohns Avenue, both of which have elevations of approximately 17.7 mASD.**

4) The CMP:

on a final note regarding the CMP: This document is brief and useless in identifying mitigating measures to reduce the impact on the residents of 64 Fitzjohns Avenue.

Noise and Vibration and Air Quality

High hoardings will be erected to ensure complete physical protection and reduce impact of noise and dust. The potential exposure to noise nuisance is from vehicles accessing and exiting the site. The movement of vehicles will be intermittent.

Restrictive hours of operation and the implementation of the Considerate Contractors Programmes will seek to minimise the construction phase impacts. If the Council feel it is warranted, this matter can be controlled by condition.

Whilst other regulatory regimes manage the impacts of vibrations, if the Council feel it is warranted, this matter can be controlled by condition.

The erection of high hoardings on the boundary with #64 Fitzjohns Ave will serve to plunge the lower ground flat of 64 Fitzjohns Avenue into darkness. The proximity of the site to all the neighbours will mean that hoardings will do nothing to mitigate dust and noise. The amenity space of the lower ground flat at 66 and 64 Fitzjohns will be unusable and unsafe during the construction. The potential of noise nuisance is clearly not only from vehicles accessing the site but from the works themselves which cannot realistically be mitigated. There are windows of 64 Fitzjohns Avenue along the drive to 66 Fitzjohns which will simply be un-openable and how exactly do you mitigate the effect of lorries driving past your window so closely that you can touch them.







The new proposed tree location does nothing to obscure the building from #64 Fitzjohns. The existing silver birch (T1) performs this task perfectly and I see no justification for the removal of this tree in light of the added intrusion and loss of privacy this will cause..

There is only one option for the planning department acting dutifully and professionally and that is to reject this ill conceived application.

Yours Faithfully

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