



Dear Sir,

My wife and I reside at 21Pond Street which, as you know will be affected by the above development. I am concerned that the proposals submitted by the applicant for the protection of buildings in Pond Street are inadequate and do not comply with the requirements of the S106 agreement.

The proposals include both monitoring arrangements and condition surveys. The proposals appear to have been conceived on a "one size fits all" basis insofar as the same proposals apply to most of the buildings uniformly. In reality, they are all very different structures and range from concrete framed buildings, buildings with retained facades and listed buildings that are over 250 years old. As such, each of these buildings will have been built differently, will have different wall, floor and foundation constructions and hence will respond differently in terms of how they "behave" as building structures.

It is important that each building is individually examined and evaluated in order to understand how it will respond in the event of ground movement nearby. It is only once this is understood that an adequate strategy can be developed. This has not been done.

The scheme monitors the vertical, horizontal and lateral movements of solely the front walls and ignores what is happening to the rest of the buildings. It is conceivable that there may be no sign of movement in the front wall of a building but cracking may develop within the building in a location somewhere away from the facade.

Monitoring has already been undertaken by the hospital/developer but, even though promised, the results have not been made available to residents, owners and proprietors of properties in Pond Street. It is

important that the records are provided to the owners etc. and in a format that a layperson can easily understand.

Even the applicant's structural engineering consultants, Campbell Reith Hill, have recently requested that the area covered by the applicant's ground model needs to be increased in area to include the Pond St. properties as well as an area well beyond them.

The proximity to development of some of the Pond Street buildings is almost as close as the The Wharrie Cabmen's Shelter in Rosslyn Hill which seems to be the subject of a more thorough approach from the applicant. The shelter is upslope from the proposed development whereas the properties are below and therefore more vulnerable. They should not be subject to a lesser standard of care from the applicant compared to other "neighbouring" properties.

Another concern is what may happen should there be a catastrophic event. For example, a section of the temporary works may collapse and as a consequence there will be significant movement of the soil that could lead to movement of the Pond St. properties. How would such an event be dealt with if it happens in the middle of the night on a Saturday? At worst it could mean that the building/s could become uninhabitable. How is that message to be conveyed to occupiers and what contingencies are in place were this to happen. The proposals should encompass such possibilities.

The Hampstead Green Neighbourhood Group has tried unsuccessfully to enter into a dialogue regarding these proposals with the applicant. Meaningful consultation has not taken place as required by the S106 agreement. In this connection it should be noted that Mr Owens originally agreed last November for the matter to be considered by the 2 teams of experts i.e. those acting for the hospital and those acting for St Stephens and then promptly changed his mind. I tried for several months to get this reinstated and it was finally discussed at the very last such meeting but our representations via the structural engineer Ian Stephenson were rejected by Mr Owens. I attach a copy of a letter from Mr Stephenson to Mr Owens setting out his concerns.

The monitoring system assumes there will be sufficient early warning for the contractor to stop whatever may be causing significant vibration or movement before any adverse consequence or damage occurs. If this doesn't work and there is damage, owners will be left having to prove that any damage was caused by the construction works potentially without access to the monitoring evidence. The St Stephen's experts should have an ongoing advisory role throughout the construction period, paid for by the hospital.

Furthermore, it is relevant that the report of LBH Wembley which was posted on your website for this application on 24th November draws attention to deficiencies in the submission proposals for safeguarding neighbouring properties which cannot be dismissed.

It appears from the latest plans submitted that the construction method/ Construction Management Plan involves: -

1. The use of vibrating rollers to compact the piling mat which is inappropriate this close to masonry buildings of this age and type.
2. Heavy lorry loading and unloading: this is likely to be far more challenging than previously advised by the applicant which will prolong construction time and cause significant additional congestion noise and pollution in Pond Street. It is likely to render the operation of Hampstead Hill School unfeasible so should not be permitted.

As regards ground modelling it should also be noted that even the applicant's structural engineering consultants, Campbell Reith, have recently requested that the area covered by the ground model needs to be increased to include the Pond Street properties as well as an area well beyond them.

The S106 agreement requires that the DBCP proposals should be based on conservative assumptions relating to ground movement. It appears that this requirement has not been met.

At a half yearly meeting of the Royal Free Environment Liaison Group on 16 May 2017 Andrew Panniker, the Royal Free's director of Estates and Dominic Dodd, their chairman advised that consultation between their experts and those of St. Stephens had resumed on a fortnightly basis and that it was the intention that those experts reach a mutually agreed conclusion as to whether the new plans being the DBCP and CMP then being worked on would meet the standards required in the section 106 agreement inc. that damage to neighbouring buildings be no more than minimal meaning not to exceed Burland Scale "0". In the event this was abandoned. Consultation between both teams of experts was suspended for several months prior to the recent submission with the exception of one short notice meeting shortly before the submission to Camden Council which did not give rise to any meaningful further consultation. There was certainly no mutually agreed conclusion. In addition the recent submission gives the misleading impression that all of the points raised by interested parties including the St Stephens experts have been satisfactorily dealt with when that is not the case and many items remain unresolved as pointed out in the recent Birketts submission to yourself.

According to the latest plans, the Hampstead Green footpath is to be completely closed for several weeks during the period of construction whereas the previous proposal was only for a narrowing by approximately 50%. This too is contrary to the requirements of the S106 agreement.

For all of the above reasons including there has not been the consultation with interested parties required by the S 106 agreement, the current proposals are inadequate and the application should be rejected.

Please treat this communication as an objection accordingly.

Yours sincerely,

Jeffrey Gold



Stephenson Davenport Structural Associates Limited

16 Boxwell Road, Berkhamsted, Herts., HP4 3EX.

Tel. 07746 235034

Mr Peter G Owens,
Pears Building Project Champion,
Royal Free Charity,
Pond Street,
London, NW3 2QG.

20th October 2017.

Dear Peter,

Royal Free Hospital, Pears Building project – Pond Street monitoring proposals

I am sure that you are aware, that in addition to the work that I have been undertaking on behalf of St Stephen's Trust regarding the impact of the construction of the Pears Building in relation to the St Stephen's Church, I have also been appointed to review the proposals on behalf of some of the owners of the group of properties, these being 5 to 21 Pond Street. My understanding is that as part of the Section 106 agreement there is a requirement that the concerns of these owners are addressed.

One of the items that I raised in my report that is dated 6th March 2017, was the approach that the team was taking regarding the monitoring of the buildings in Pond Street.

My concerns relate to the very nature of the buildings in that grouping. They are all very different structures and range from concrete framed buildings, buildings with retained facades and listed buildings that are well over two hundred years old. As such each of these buildings have been built differently, will have different wall, floor and foundation construction and hence will respond differently in terms of how they 'behave' as building structures.

For that reason it is important that each building is looked at differently and is examined and evaluated in order to understand how it will respond in the event of there being some ground movement nearby. An older building on very shallow footings will respond to the ground movements in a very different way to that of for example of a rigid framed building on deep foundations. There needs to be a real understanding as to the nature of the building structure, how it is supported, where it gets its stability from, etc. It requires an

understanding as to how cracks may develop, where they may develop, the extent of the cracking, etc.

It is only once that is understood, can one begin to prepare a strategy in terms on how a building structure should be monitored. All these buildings that we are talking about will respond differently. I have had experience where there was no sign of movement in the front wall of a building, but cracking developed around 4 to 5 metres within the building remote from the façade. The cracking was ascribed to ground movement that occurred to outside of the building close to the front of the building. However, in spite of the ground movement nearby, there was no sign of cracking to the front wall. The consequences of the ground movement had manifested itself well within the building.

I believe there is potential for this happening to some of these properties.

This brings me on to my concerns regarding the monitoring system that has been put in place. I welcome the idea that monitoring has been proposed and am pleased that there is something in place. In my view however, the monitoring that has been proposed focuses solely on the front facades and seems to ignore what goes on behind. The system monitors the vertical, horizontal and lateral movements of solely the front wall and ignores what is happening to the rest of the building. I believe that this needs to be addressed and a far more holistic approach is taken to each of the buildings.

I did raise the issue of the proposed monitoring system at the briefing meeting that was held with the St Stephen's technical team at Wilmott Dixon offices on the 3rd October. I was informed that as far as the monitoring of the Pond Street properties was concerned, the system that was in place would not be changed from what was installed and as described in the DBCP plan that was submitted to Camden at the beginning of this year.

This is disappointing as in following this approach neither party is properly protected. By that I mean, both the owners of the property and yourselves as the developer would be at loggerheads if something were to occur by way of cracking or settlement of a section of the building and there was no recording by way of monitoring as to why or how this had happened. With good monitoring information that looks at the building as a whole, reasons and conclusions can be reached far more quickly.

What is also important to note at the meeting a fortnight ago, whilst the St Stephen's team were being briefed about the 'ground' model for the area beneath St Stephen's and the School, we were informed that your structural engineering advisors, Campbell Reith Hill (CRH) had requested that the area covered by the 'ground' model needed to be increased in area to include the Pond Street properties as well as an area well beyond them.

It is an important fact that this has been requested as part of the review process as it does indicate that Campbell Reith Hill are showing concerns about gaining an understanding of the ground below the Pond Street properties and in the light of this, it makes sense to respond in a similar way and have a far more robust monitoring system in place to 'keep an eye' on things as far as these properties are concerned.

I also understand that monitoring of the façade on the Pond Street properties has been undertaken over the last six months. I have not had site of the results (and nor have my Clients) and hence I cannot comment on them. I welcome that they are in operation, but as noted above feel that the principle that has been followed is not robust enough. It is always important however to get a good background set of reading before work starts. It gives an idea of movements of a building due to temperature, seasons, etc.

It is also important that the records that have been taken are provided to the owners now and provided in a format for each owner in a format that a lay person can easily understand. This should be taking place now.

Another concern in this regard relates to a catastrophic event. I certainly hope that this never happens, but there must be a strategy in place where this is addressed. An example would be that a section of the temporary works may collapse and as a consequence there would be significant movement of the soil that could lead to movement of the Pond Street properties. How is that event dealt with if that were to happen in the middle of the night on a Saturday? At worst, it could mean that a building could become uninhabitable. My concern is how is that message conveyed to my Clients and what contingencies are in place if this were to happen.

I am happy to meet up and discuss this with you in more detail. I do feel that it is incumbent upon your team to look at ways in which the monitoring can be more robust in the approach that should be taken and that clear lines of communication are established. That ought to be happening now.

Yours sincerely,



Ian Stephenson

B.Sc.(Eng), C.Eng., M.I.C.E., M.I.Struct.E
Technical Director
for Stephenson Davenport Structural Associates limited