

July 29th, 2018

Application number: 2018/2342/P: 6 Albert Terrace Redevelopment Plan

**OBJECTION to Application for Planning Permission at 6 Albert Terrace by
Applicant, M. Golinsky.**

Opening Statement:

I, Daniel Widdicombe, am the lawful tenant of [REDACTED]
[REDACTED] I reside there with my three [REDACTED] children [REDACTED]
years old respectively. I rent [REDACTED] my father, David Widdicombe, [REDACTED]
[REDACTED] I am registered to vote and pay Camden Council
tax under this address.

1. **Objection:** Planned development of deepening the basement is not in keeping with basement depth of existing houses in the area. 6 Albert Terrace already has a basement, which has been the subject of a series of previous planning applications since 1939, most recently in 2017 - 'Excavation and extension of an existing basement.' Originally the basement area was for storage and worked well, now deepening of the existing basement by 40cm is unnecessary. The new application proffers the rationale to the increase in basement depth as "to create 3m internal floor to ceiling height which would be appropriate for a significant house such as this". We do not accept this characterisation at all. What *is* appropriate for such a "significant house" is the existing basement level - for example at Number 5 Albert Terrace [REDACTED] - which has a 10-foot ceiling and is perfectly acceptable in terms of height and space.

Indeed, RSK Environmental, in their Basement Impact Assessment ("BIA") report Item 2.2 on P3 state that "the adjacent No. 5 Albert Terrace.... with a lower ground floor/basement beneath its entire footprint at a **similar level** as No. 6" (our emphasis). As we can see, No. 6 is already at the appropriate level for buildings of the area and has no need to go deeper for at the risk of subsidence and flooding.

In Camden Council's Local Plan A5, Basement Policy: "the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property". At present the basement is subordinate to the building so respects this plan appropriately.

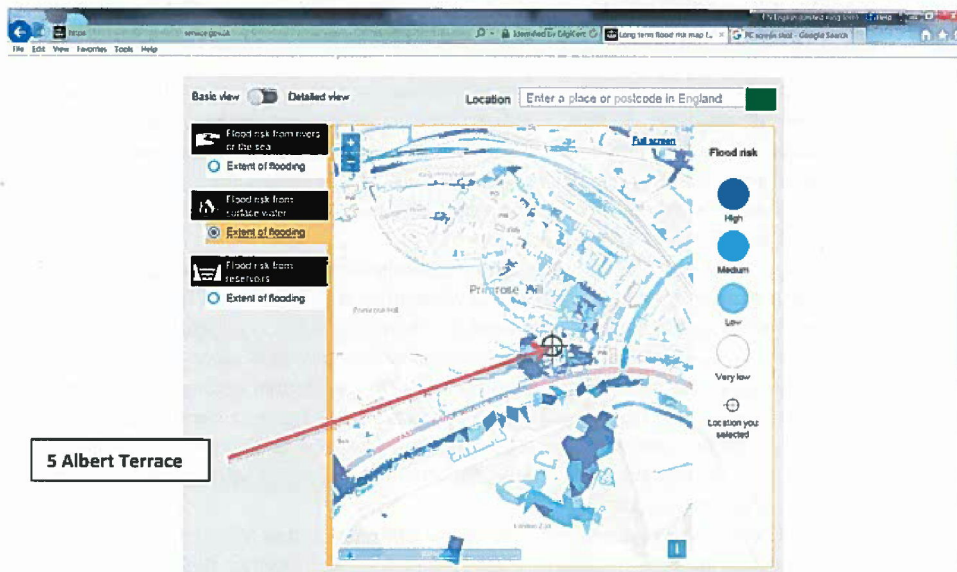
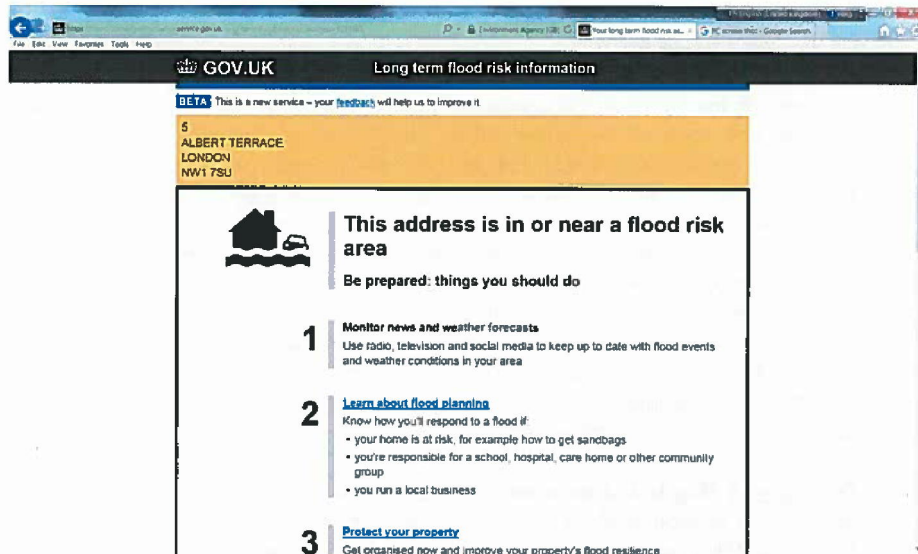
2. **Objection: Structural and subsidence risks.** Works to this depth and on this scale raises the risk of structural damage to 6 Albert Terrace, the attached 5 Albert Terrace, and also to properties in the Mews. 5 Albert Terrace has already historically suffered cracks and subsidence due to shifts in the London clay soil under the building. These have been monitored, over time, as a requirement for a mortgage application by David Widdicombe, [REDACTED] The latest application by Mark Golinsky makes a series of assumptions about likely movement of the soil and the extent of underpinning needed to retain structural integrity and prevent heave and other issues.

We question the validity of these assumptions, which draw on rules of thumb from other developments in other areas and which are not specific to this site and this proposal.

- a) For example, on Page 16 of the BIA, para 4.2.5, RSK says: "It is almost certainly the case that the proposed basement construction will result in differential foundation depths. Therefore identified hazards are associated with ground movements from perimeter retaining wall installation and ground excavation, and elastic heave of the London Clay in the basement excavation associated with stress release". Then, under para 6.3.2.1 of the BIA, "Basement Construction", RSK states: "For the unloading stage, the results indicated that the unloading will result in a maximum short-term heave displacement up to 13mm in the area of the deep basement....". **Comment:** In our view this kind of level of movement appears to be more risky than is acceptable for these 150 year-old plus houses.
 - b) Furthermore, 6.4.4 on Page 24 states: "While the underpinning falls outside of the C760 guidance, it has been assumed that comparable movements associated with diaphragm wall installation may be expected". **Comment:** This raises several questions. Firstly, why does this plan fall outside the very detailed guidance? (see attached document as an example of C760 guidance). Secondly, why is it merely "assumed", and why only "may" the outcome be expected? Hedging language reflects uncertainty and a lack of confidence in the outcomes, which is not acceptable.
 - c) 6.4.4 continues "Providing adequate precautions are taken during the construction, the anticipated settlements of the party walls onto the underpins are likely to be significantly reduced. It should be noted, however, that this is fully dependent on the good workmanship and control during the installation process. **Comment:** Again, the use of "likely" above, as well as the full dependency on workmanship and control, rather than physics and defined engineered outcomes, are extremely worrisome.
 - d) A lack of attention to detail in spell-checking "Cumulative (sic) impacts" top of P27 etc also suggest a lack of focus and care within the report.
3. **Objection: Considerable Flooding Risk** - The Basement Impact Assessment ("BIA") plan produced by RSK Environment Limited ("RSK") concedes in para 4.1.1 on P14 that "the lowest excavations at the site are for the sub-basement structures....will possibly take the excavation below the base of the Regents Canal and nearby ponds in Regents Park".

It is our personal experience that flooding risk at the very foot of Primrose Hill, where 5 and 6 Albert Terrace are situated, is HIGH. Every year there are days and weeks where the foot of Primrose Hill gets substantially flooded by accumulated rainwater that gathers in huge pools for days and sometimes weeks. [REDACTED] steps down to the [REDACTED] Flat are often inundated with surface flood water which goes up to our door entrance, and on occasion has entered into the [REDACTED] Flat.

The Government Flood Risk below clearly shows 5 Albert Terrace to be within a 'Medium to High' flood risk area from surface water, and surrounded by High Risk areas directly in front and behind. This is despite the Applicant M Golinsky's assertions that the area is located in a low Flood Risk Zone 1.



Furthermore, it is the case that flood zones don't always take into account all the blocked drains, sewerage flooding, and areas impacted by very heavy rainfall etc. As a result, sites in a low risk Flood Zone 1 for example could still experience flooding. We would request that a Critical Drainage Areas assessment be undertaken specifically addressing the perennial flooding problem at the foot of Primrose Hill as

part of a planning application, with areas deemed to be at high risk of flooding from rainfall being clearly marked.

In preparing the proposal, the applicant's agents conducted test drillings to establish geology and level of the water table. The Structural Engineering Proposals / Basement Impact Assessment included with the proposal states that the drillings were reviewed for ingress water over a period of one month. This is a woefully inadequate period of time to make an assessment that is essential to the structural calculations and the entire project. We refer to the subsidence already experienced in point 2 above – the view of the surveyors consulted was the movement was as a result of the London Clay drying out. Long term patterns of rainfall and changes to the moisture level in the clay need to be understood if the structural calculations are to be accurate. My view is that the level of uncertainty of an excavation of this scale with respect to the inter-related issues of geology, water table, water content of clay, and flood risk is totally unacceptable.

4. **Objection: Piling is unnecessary for a project of this nature.** We question the construction method of piling as it creates the maximum disturbance to neighbours. Camden's policy states at 6.113, "...it is important that" (basement development) "is done in a way that does not cause harm to the amenity of neighbours".
5. **Objection: Construction Management Plan ("CMP") – multiple objections relating to factual errors, lack of clarity of plans, etc**
 - a) Page 11 of the CMP states that 5 Albert Terrace is divided into 4 flats. **Comment:** This is not true. In fact, 5 Albert Terrace is a single-owned house with one separate flat on the basement level. The rest of the house is one contiguous dwelling. This is a basic error which raises the concern that other parts of the plan are similarly poorly researched and slipshod. This error continues through the report: P16 refers to "the flats in No 5".
 - b) Page 15 of the CMP says that the "consultation and discussion process should have already started with the results being incorporated into the CMP first draft submitted to the Council". **Comment:** There has been no such consultation and discussion process initiated with the local community as of now.
 - c) Page 23 states that "there are no current schemes of this nature in the immediate neighbourhood". **Comment:** Again this is not true. There is currently a basement project being undertaken in Albert Terrace Mews. It is concerning that the CMP does not include accurate information. It should be rejected on the grounds that it is not factually accurate.
 - d) **Environmental issues:** Page 27 of the CMP states that "Rotary piling rigs will be employed to bore structural piles to the site." **Comment:** We question why is piling necessary for this project? There is no clear need for piling and its attendant noise and disturbance.
 - e) **Noise management:** Page 28 of the CMP: "The quietest and newest vehicles/plant machinery shall be used at all times.....fitted with effective exhaust silencers." **Comment:** These kind of statements can't really be taken at face value and smack of throw-away promises. Where is the proof of the above? The

builder should submit examples of the “newest vehicles/plant machinery” for assessment of the accuracy of these statements.

- f) CMP Page 43, Item 3.4. **Lower Ground Floor Extension.** “The design of the new substructure remains subject to site investigation and detailed design”. **Comment:** Why is the plan not already detailed enough and why has the site investigation not been completed? Planning permission should not be granted without a detailed design and construction plan.
- g) CMP Page 43 continues: “Piling design will need to consider the size of rig that can access the site”. **Comment:** Our question is, given that all site plans are currently available, why isn’t this fairly standard analysis available at this time?
- h) Page 43 then states: “Excavation and concrete placement will largely be by hand, with underpinning constructed in one metre sections on a “hit and miss” pattern”. **Comment:** The reference to “hit and miss” is concerning.
- i) Page 43 also states: “Storage of diesel fuel in approved, double-bunded tanks will be necessary”. **Comment:** It is not clear why this would be necessary and the risk of an explosion constitutes a heightened risk to residents nearby including my children and father. This requires far more detail as to the rationale.
- j) Page 57. **Vibration Control.** “Where elevated levels are recorded the source will be investigated and, where possible, alternative techniques employed to reduce the levels.” **Comment:** Piling is an extremely noisy and high-vibration activity. I have personally lived next to and around piling projects in Hong Kong and can attest to this. What “alternative techniques” do the constructors consider could be used? More detail should be provided on this prior to granting planning permission. If they are not able to detail a quieter solution, the application should be refused.

6. **Objection: Investigation Report issues: Lack of clarity, certainty and thoroughness.** Mark Golinsky’s Planning Statement relies on RSK’s Site Investigation Report of April 2017. This Investigation Report is riddled with uncertainties that have never been clarified. For example:

- a) Page 18: It says “the pilot hole determined the concrete to be just over 550 mm in thickness and therefore it was considered that breaking out these location with standard techniques would not be possible.” **Comment:** This lack of certainty is worrisome given the impact that construction errors would have.
- b) Page 19: “obstruction (possibly metal) stopped any further progress... It was not possible to confirm” (the thickness of the wall). Page 19 continues: “due to the limited investigation undertaken it cannot be concluded if this thickness is consistent across the site.” **Comment:** This lack of certainty is worrisome given the impact that construction errors would have.
- c) Page 20: “The retaining wall structure is likely be formed”. **Comment:** there doesn’t seem to be any certainty. The plan needs to be certain and specific. This is not fit for purpose.
- d) Page 24: “It should be stressed that the above capacities do not take into consideration pile group effects, which is more pronounced for a large number of closely spaced piles.” and, “The preliminary pile loads.... Should be checked against an effective stress approach due to the significant unloading associated with the basement excavation.” **Comment:** The fact that there is no conclusion and checking is concerning.

- e) 6.4 on Page 24: "In order to facilitate basement construction it may be necessary to construct some form of embedded wall and either a sheet pile or a continuous piled retaining wall would appear suitable options for the site conditions. **Comment:** The language is not specific, not certain, not fit for purpose. Use of words like "may", "either, or" do not project confidence in the knowledge or expertise of the planners.
7. **Objection: Impact on Conservation and Heritage Area.** We object to the impact of this proposed development on the Conservation and Heritage area of Primrose Hill Conservation Area (Sub Area 1). While 5 and 6 Albert Terrace, as a complete property, are not Listed, it lies 30 feet to the south of Primrose Hill Drinking Fountain (Grade II listed) which is a popular local tourist spot for photographs. The fact that the proposed plan for 6 Albert Terrace includes knocking down the entire side extension of the house, and will include boarding and hoarding extending over the pavement into the street, will result in a long-term eyesore in this popular area.
8. **Objection: Disruption to traffic.** Albert Terrace is a busy one-way route linking Regents Park Road and the A505 (Prince Albert Road) and is on the route of the 274 bus. We object to the disruption to the flow of traffic that this project will create. The excavation period of this project will likely involve an elevated excavation conveyor belt which will extend into the street which narrows at the junction on Regents Park Road. The planning proposal has not dealt with traffic issues in any serious or detailed way, and in any case the proposal is not able to mitigate for this impact.

Development works in the immediate area and at 6 Albert Terrace

9. **Objection: Ongoing concurrent Developments in the immediate area.** We object to the further disturbance that would be caused to the neighbours if this development was allowed to proceed. Work is currently being carried out at 45 Regents Park Road, approval for a basement has been given at 20 Albert Terrace Mews, an application is currently being considered for 6 Albert Terrace Mews and a further one at 6 Albert Terrace. If approval is given a condition should be included to prevent these five building works taking place at the same time.

Residents on Regents Park Road have been subjected to numerous, large-scale renovation and 'improvement' projects in the area in the last 10 years, resulting in noise, nuisance and disruption to flow of traffic and parking. Camden needs to take a holistic approach to planning in areas subject to large-scale development projects by private owners. Approvals should look beyond individual projects and consider the overall impact on the area of non-stop construction.

Below are photographs of existing examples of building work surrounding the area of 5 and 6 Albert Terrace, including Regent's Park Road and Albert Terrace Mews, including a basement project currently underway in Albert Terrace Mews.



Other objections

10. **Objection: Parking in Albert Terrace.** Residents parking places are already always full on Albert Terrace and Regents Park Road. The proposal is that several bays outside 6 Albert Terrace on both roads would be used by construction vehicles. This will increase the pressure on parking spaces. Due to my 94-year old father's age and condition his car has a Disabled Driver designation. We will need a Disabled Parking Bay outside No 5 Albert Terrace to be able to park his car (he is driven by carers and family) directly outside his house. This bay should not be occupied by any construction-related vehicles for No 6 Albert Terrace.

11. **Objection: Air-Handling Units and Heat Reversal Units.** The units mentioned may be operated all year round, 24 hours a day, 365 days a year. These will pollute and vibrate. We object to the inevitable noise and disruption these units will cause so close the windows at the rear of 5 Albert Terrace – and to our neighbours in the Mews.

The proposal mentions installing air handling units (and later, condensers for a future pool application, we suspect) on the garden-side when the acoustic tests were actually done on the Albert Terrace/Regent's Park Road side. The acoustic tests were carried out at the front of the building and not the back which is much quieter—so plant proposed for this area (back) will impact more severely than the application shows therefore Clement Acoustics need to carry out a viable test at the back of the house in order to get a proper reading.

12. **Objection: Future likely developments** – the owner of Number 6 has also purchased the house at the back in Albert Terrace Mews.

The proposal to demolish the side garden wall on Regent's Park Road, pile under it and rebuild it 35cm higher on top of a great long concrete beam, is exactly what would be required if subsequently excavating a connection between the 6 Albert Terrace house and 6

Albert Terrace Mews. While the current plan does not mention any plans to include the Albert Terrace Mews property at the foot of the garden, it is patently obvious that this will become part of a larger property, potentially with swimming pool, when/if conditions are right for the owner to make another application. We believe M. Golinsky's overall plans including the Mews property should be made available to the neighbourhood as well as the Council.

13. **Objection:** BIA plan is riddled with uncertainties. that cause us to strongly question the robustness of the overall plan. On Page 1, Non-Technical Summary, under Proposed Development, it states that "the retaining wall structure is likely be formed by a combination of underpinning..." (our emphasis). On P14, 4.1.1, the excavations are described as "possibly taking the excavation below the base of the Regents Canal". **Comment:** The constant use of hedging language, like "likely" and "possibly" show that the plan has not been well thought out. The word "likely" is repeated at the top of P4 and elsewhere. There should be clear and definite conclusions when dealing with important issues such as subsidence and flooding, which are markedly and worryingly lacking here.
14. **Objection:** The Planning and Heritage Statement & Design and Access Statement ("Planning Statement") place great reliance on the BIA by RSK Environmental, and make many definitive statements about the BIA, that the BIA itself does not bear out. The potential impacts are not certain in the BIA, yet the Planning Statement makes them appear to be definitive.

Furthermore, the Planning Statement relies on RSK's Site Investigation Report of April 2017. This is riddled with uncertainties that have never been clarified as we have outlined earlier.

- a) **Comment:** P27 we do not agree that the BIA is "robust" given its preponderance of hedging language and lack of certainty as to designs, construction plans, and outcomes.
- b) **Comment:** The Planning Statement has patently NOT demonstrated that there will be no harm to the surrounding area, particularly to 5 Albert Terrace.
- c) **Comment:** The planned development does NOT present an excellent opportunity to add space. It appears to be a commercially-driven vanity project laying the groundwork for a later swimming pool application.
- d) **Comment:** It does NOT have minimal impact to the local area.

Summary

In summary, it is therefore requested that the proposals be refused.