

London Borough of Camden
Development Management
2nd Floor,
5 Pancras Square
c/o Town Hall,
Judd St
WC1H 9JE

29 July 2018

Dear Ms Chana

I am the owner of [REDACTED] I am writing to object to the planning application for [REDACTED]
[REDACTED] 75 Lawn Road (Planning reference [2018/2136/P](#)).

As I said when commenting on the previous (refused) proposal for 75 Lawn Road, [REDACTED]
[REDACTED] between 77 and 75, both of which are planning increased footprints, especially at the sides and back, and digging of large basements (77's planning application has been approved, 75 has now submitted an application that includes a basement).

This leaves [REDACTED] 2 very big projects that could threaten the structure of my house, and make living in it whilst construction is going on quite unbearable for a very long time. I would like to be certain that that this will be given due consideration by the planning officers and Campbell Reith both in terms of ground and water movement, structural considerations, stress and noise.

The submitted planning application for 75 Lawn Road conflicts with a number of published planning and conservation policies and guidances, including Camden's Local Plan 2017, Camden's supplementary planning guidance CPG 1- Design and CPG 5 – Amenity, and the Parkhill and Upper Park Conservation Area Appraisal and Management Strategy.

Key areas of concern are:

- Cumulative impact of 2 basements, one on either side of my house
- Overbearing development and sense of enclosure at the front of the house

1. Cumulative impact of 2 basements and Burland scale damage predictions

Please note that unusually the house numbers run sequentially on Lawn Road, so that 74, 75, 76, and 77 are all next to each other on the same side of the street.

I request that both Camden Planning and Campbell Reith consider my points below.

Summary of current relevant basement applications

- Planning application 2016/1737/P for a large basement at [No. 77 Lawn Road](#) was approved and work started 5 March 2018 and is still continuing.
- Planning application 2018/2555/P was submitted by [77 Lawn Road](#) in June 2018 for a variation on the approved application 2016/1737/P. The application **included a revised Ground Movement Report that**

predicted long-term damage to [REDACTED] (76 Lawn Rd) of Burland Scale 2, which is not permitted under the Camden Local Plan 2017.

- Planning application 2018/2136/P for No. 75 Lawn Road is a new application for a large basement (registered on 26 June 2018)
- Planning application 2018/2555/P for the 77 Lawn Road variation was withdrawn on 18 July 2018. Construction of the basement has continued throughout the period from March 2018.

Relevant policy

The new Camden Local Plan (2017) makes it clear that the cumulative impacts of basements are of potential concern to Camden Planning;

- Page 214, Policy A5 Basements: “The Council will require applicants to demonstrate that proposals for basements avoid cumulative impacts;” (point p)
- Page 217: Para 6.124: “Cumulative impact: The cumulative effect of several underground developments in close proximity can be more significant than the impact of a single basement. The impacts include changes to ground water flow, land stability, surface water flow and flooding. **Basement Impact Assessments must consider the potential wider impacts of basement schemes and the potential cumulative impact of other basement schemes in the area.** Basement Impact Assessments must identify all relevant basements in the neighbouring area, including their extent and ground conditions and make an assessment of the combined effect of underground development with all nearby basements considered together. The assessment must include existing and planned development including schemes with planning permission and those to be developed under permitted development with a Certificate of Lawful Development.”

I would like to make the following overarching points

- The distance between the boundaries of these two basement projects is **only 13m** (i.e. the width of my back garden).
- The Basement Impact Assessment and ground movement predictions for 75 Lawn Road do not appear to mention or take into account the large basement development at 77 Lawn Road. This is in breach of the July 2017 Local Plan para 6.124. The applicants signed off on the BIA for 75 Lawn Road *after work had very visibly already begun on the basement at 77 Lawn Road*. **The BIA should be revised and resubmitted, taking into account the combined effect on my house of the two large basement developments, which are only separated by the width of my garden.**
- Under the Local Plan, there is a limit of Burland Scale 1 on damage to neighbouring properties. **How are cumulative damage scales calculated? Can I be sure that after both basements are completed my house will not have suffered any overall damage greater than Burland Scale 1?** My concern is that a crack will be made by the first basement project that will be widened by the second basement project.
- It is possible that two basement excavations on either side of a single house should not be allowed to proceed simultaneously or in quick succession for several reasons, including the issue of liability for any damage to No. 76. How will it be possible to determine which excavation caused the damage [REDACTED] in

between the two projects, if the two excavations and basement builds take place at the same time, overlap, or one follows the other before all settlement has been allowed to take place from the first development?

- **How do Camden's new basement policies protect a house like mine that is in between two large basement developments, one of which is in construction and the other of which will potentially overlap or follow soon after?**

Summary of Burland scale damage predictions for 76 Lawn Road

For 77 Lawn Road, the approved planning application 2016/1737/P predicted Burland Scale 0 for short-term impact and Burland Scale 1 for long-term impact for my house. The variation application 2018/2555/P included a new Ground Movement Report that increased this damage prediction to Burland Scale 1 for short-term impact and Burland Scale 2 for long-term impact. The variation application was withdrawn but there does not appear to be any reason why the revised Ground Movement Report predictions are not correct as the methods of piling described in the report appear to have been implemented.

For 75 Lawn Road, planning application 2018/2136/P predicts maximum Burland scale 1 damage for my house.

How am I supposed to understand the totality of the potential damage to my house that will be caused by the two developments combined? Camden Planning needs to address this question.

Assumptions made by 75 Lawn Road in predicting damage

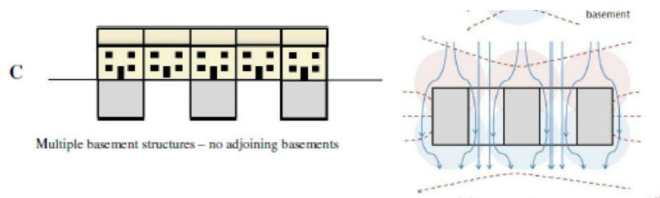
While the 75 Lawn Road development does not predict damage above Burland Scale 1, its damage predictions appear to be based on a very wide range of assumptions. For example:

- Part 1 of the 75 Lawn Road BIA cautions: "It must be noted that there may be special conditions prevailing at the site which have not been disclosed by the investigation and which have not been taken into account in the report. No liability can be accepted for any such conditions." **It appears that the BIA was prepared by professionals who were unaware that my house is already suffering from serious subsidence, which I would consider to be a "special condition"**. This subsidence predates the basement works at 77. My subsidence is not mentioned anywhere I can see in the 485 pages of this planning application. So it seems that neither the existing subsidence nor the basement at No. 77 was taken into account when preparing the BIA and the Ground Movement Assessment?
- The Structural Engineers Design Statement for Planning, Section 4.0.3, page 7, Ground Movement Analysis summarises the ground movement analysis as showing the predicted impact on the neighbouring properties are no greater than Burland Scale 1. However it adds:
"The Camden Council guidance requires construction to maintain a level of risk to buildings no higher than category 2 therefore this assessment is well within the council's required limits".
The application is referring to outdated policy. Camden Local Plan (July 2017) damage from basement development must be limited to maximum Burland Scale 1.
I am concerned that the Structural Engineers for this project seem to think they have a considerable margin for error in the damage predictions because they wrongly believe that it is permissible for the damage to increase to Burland Scale 2. Camden Planning must ensure that they realise that Burland Scale 1 is the required limit.

- The Fairhurst Ground Movement Assessment (page 12) comments on “the limited data” which meant that “the same parameters have been used for all soil types”. Is this a reliable approach to this type of ground movement modelling?
- Fairhurst has not been provided with completely accurate measurements of my house to feed into the damage predictions. For example, the length of Wall W9 (Table 4-3 and Figure 5) is given as 5.4m but it is actually 6.7m; Wall W11 is given as 6.1m but it is actually 5.2m. Additionally, Wall W10 is identified as being the only wall with predicted Burland Scale 1 damage – is Fairhurst aware that this wall is mostly a garage door?
- Given the close proximity of the two basement applications, Campbell Reith should compare the assumptions between No. 77 and No. 75 to see if they are consistent.
- **Taking all such points together, too much uncertainty is built into the model of predicted damage to my house.**

Impact on hydrology

The Camden Geological, Hydrogeological and Hydrological Study raises the issue of effects of multiple basements on water flow (see Figure 1 Part C below, excerpted from one of the study’s diagrams).



I may have missed it in the 485 pages of the planning application documents but I could not see where this issue of the impact of multiple basements on waterflow had been addressed by the applicants’ advisors. My house is going to be in the position of one of the houses shown in C above i.e. increased water flow appears to be funnelled at it.

What impact will this funnelling have on my house and the land on which it sits?

Generally, there does not seem to be much at all about the impact of the 75 Lawn Road basement on water flows into the neighbouring gardens and properties. BIA Part 2, Fairhurst damage assessment, page 17 states: *“Groundwater has been recorded approximately 2.1m above the proposed basement level and therefore groundwater will likely be encountered during the proposed excavations ... Trial excavations to the proposed basement depth could be carried by the main contractor to confirm the stability of the soil and to further investigate the presence of groundwater inflows.”*

What impact will the 75 Lawn Road basement have on water flows into my garden and under my house? I would like to be clearer on this in relation to the diagram above.

Construction Management Plan and Traffic Management

At present, there are two Construction Management Plans and two Traffic Management proposals (for Nos 77 and 75 Lawn Rd) that do not take each other into account. **There needs to be a formal process, including consultation**

with neighbours, whereby the impact of two largescale demolition, rebuild and basement developments are considered together if the two projects are going to overlap in any way. There is also a third basement development at 24 Lawn Road, which was approved in April 2018 (See 2017/5619/P).

Noise, vibration and dust from the two building sites should also be considered together if the two projects are going to overlap in any way.

The basement development at No77 Lawn Rd voluntarily offered no weekend working at all. I request no Saturday working.

Having the example of basement excavation at No77 on hand I would also argue that the excavation phase counts as Noisy Works.

No 77 are monitoring cracks and movement in my house on a weekly basis. I have a very complicated situation of subsidence already existing in my house and am very concerned about the effect of further building and digging in adjacent houses. I request internal as well as external monitoring.

2. Overbearing and sense of enclosure – front of the property

I object to the proposed 1st floor front projecting extension abutting [REDACTED]. This extension will project forward by about 2 metres along the boundary wall [REDACTED] (see Figure 2).

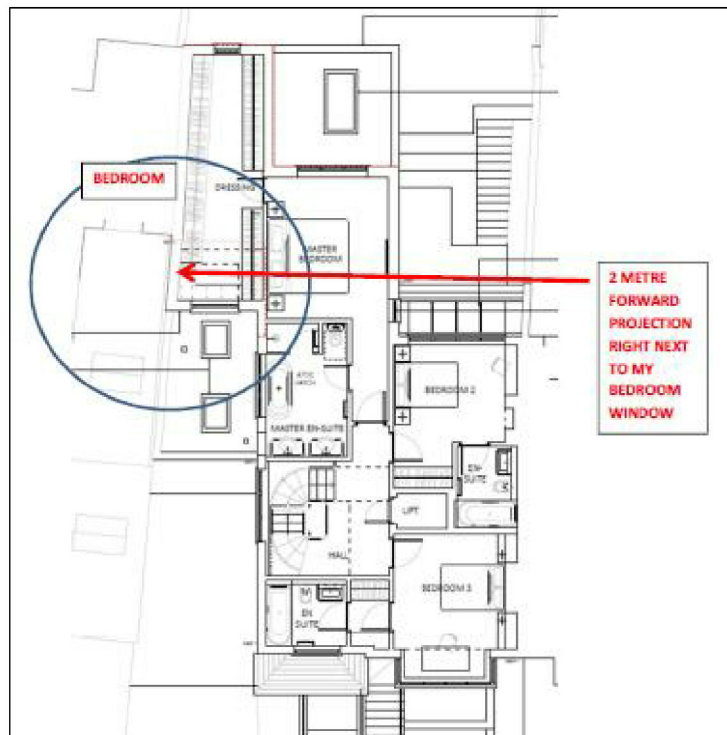


Figure 2: annotated excerpt from submitted plans

Camden Planning did not object to the 1st floor front projection last time, but **there were 2 factual errors in the Camden Planning Officer's Report**

(<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/7071902/file/document?inline>):

- Para 5.3: Camden Planning wrote: *"The first floor extension would be 2m deep incorporating a dormer window within a pitched roof and would come forward of No.76s first floor window. No.76s first floor has dual aspect windows to the first floor room and **if it's a bathroom then that is not a habitable room.** Therefore it is not considered the first floor extension would have a detrimental impact to the amenities of No.76 in regards to loss of light, overbearing, overshadowing or privacy impacts."*

The room that is referred to in this comment is not a bathroom, it is a bedroom. The fact it is dual aspect at the back is irrelevant to the way the proposed 1st floor extension at No. 75 will be over-bearing and create a sense of enclosure as [REDACTED] looking out through a tunnel effect that will 'box' [REDACTED] in. **It is not acceptable to allow a 2 metre projecting extension along a boundary right next to a bedroom window (see Figure 2).** The edge of [REDACTED] window will be just 70 cm from the new 2 metre projection. It seems particularly unnecessary for No. 75 to have this front projection because that 1st floor room is shown on the application plans as a wardrobe/dressing room.

- Para 4.2: Camden Planning wrote: *"The first floor extension would be a modest extension which would incorporate a front dormer window within a new pitched roof with lower eaves almost giving the appearance of a cat slide roof. It is noted that **there are other examples within the street scene whereby properties have projected forward at ground and first floor (Nos.72, 73 and 74 part of this terrace).** Additionally, the front projections are set so far back from the front building line, the impact on the street scene would be minimal. It is therefore considered the design, scale and use of materials for these elements would be considered proportionate to the original dwelling and would not be out of keeping within the street scene."*

It is factually incorrect that there are other examples within the street scene whereby properties have projected forward at first floor (Nos.72, 73 and 74 part of this terrace). Specifically, the 1st floor vertical planes above the side garages of the houses at 73 and 74 Lawn Road are the original 1920s building – **there have not been any alterations in the position of these walls since these houses were built.** At 72 the vertical face of the newer 1st floor side extension was built to match 73 and 74. As the applicants at 75 pointed out in their original planning application, the position of the vertical face of the existing side extension at 75 is identical with its historic position according to old plans. **It should not be moved to a new position as this will have an adverse impact on my amenity, as explained above.**

A 2 metre front projection plus front dormer is not a 'modest extension' and a new front dormer would set a precedent. It will create the only example along this row of 1920s Arts & Crafts style houses where the 1st floor side elements of two adjacent houses are not flush with each other (i.e. in the same vertical plane). This will look incongruous from the street.

Thank you for your attention.

Yours sincerely,
Ellen Solomon

[REDACTED]