

Re: Planning application for building work at 23 Lyncroft Gardens, NW6 1LB  
Application number 2018/3377/P

We are the owner-occupiers of Flats 1 and 3 at 25 Lyncroft Gardens NW6, adjacent to the proposed development at number 23. We have several concerns about the proposal.

1. **DAMAGE TO NEIGHBOURING PROPERTY:** According to Policy A5 on basements in Camden's housing policy, the Council will permit basement development only when the risk of damage to neighbouring properties is no higher than Burland Scale 1 ('very slight') (see 4.33 in Camden Planning Guidance: Basements, March 2018). The Basement Impact Assessment for the proposed development at 23 Lyncroft Gardens gives the risk at Burland Scale 2 ('slight') (For some reason, this figure is given differently in the same BIA's 'executive summary', as Burland Scale 1-2, but this would appear to be above Camden's acceptable risk level in any case). We assume that the Council would therefore refuse planning permission for the proposed work on the basement.
2. **DRAINAGE & FLOODING:** We are concerned that extra digging, apparently to below the water level, could cause drainage problems and future flooding in our and other neighbouring buildings. There was extensive flooding in properties in this terrace in 2002. The Basement Impact Assessment includes an Environment Agency map that shows 23 Lyncroft Gardens in Zone 1, which the BIA describes as having a 'very low risk' of flooding. In fact, the key to the map indicates that this area has a 'low' (not 'very low') probability of flooding and adds that a flood risk assessment may none the less be required, depending on other factors. The map reproduced in the BIA identifies only river and sea flood risk. Camden's advice states: 'While nowhere in the borough is identified by the Environment Agency as being flood prone, there are still parts that are identified as being subject to localised flooding from surface water which cannot be discharged within the drainage/sewer network.' Lyncroft Gardens is listed in Appendix 3 of Camden's 'New Basement Development and Extensions to Existing Basement Accommodation' guidance as one of the streets at secondary risk of surface-water flooding. Camden states: 'All applications within streets identified as either 'primary' or 'secondary' locations in Appendix 3 will be required to submit a Flood Risk Assessment with any application for a basement extension.' The engineers/architects of the proposed works seem unaware of this, as they state in the BIA that there is no need for them to submit a flood risk assessment. The West Hampstead & Fortune Green Neighbourhood Plan, which Camden has adopted, also draws attention to the flood risk in this area, stating that the Council's guidance 'cites West Hampstead, South Hampstead and Cricklewood as areas that have been identified as being subject to localised flooding from surface water due to local soil conditions and topography; it also cites a large number of streets in the Area that have been subject to surface water flooding in the past. Basement and underground developments in these areas should therefore be normally avoided.' This seems a clear warning against basement development in our street. If the excavation is not refused outright on these grounds, there should be a rigorous independent assessment of the proposed development's impact on drainage and flood risk.
3. **CUMULATIVE IMPACT:** Policy A5 asks the developers to consider 'cumulative impacts': '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.' We can't find any evidence in the Basement Impact Assessment that the engineers or architects have

researched this cumulative effect; as far as we know, no information has been gathered about the scope, depth or ground conditions of neighbouring basements.

4. CONSERVATION: As the property has been in the West End Green Conservation Area since 2011, we question whether the proposed alterations to the exterior are permitted under local policy — for example, the raising of the front bay window, the changed facade of the basement, the changes to the roof at the top of the building and the roof above the kitchen extension.
5. NOISE & POLLUTION: Finally, we hope that the Council considers the impact on the lives (as well as homes) of neighbours in deciding whether to grant permission for non-essential building work. Development on the scale proposed — in particular the basement excavation — would be extremely disruptive, especially to those immediate neighbours who work from home full-time and study at home during the day. We imagine that the proposed development would lead to a dramatic increase in noise, dust, fumes and vibration for several months.

██████████ Flat 1, 25 Lyncroft Gardens  
██████████ Flat 3, 25 Lyncroft Gardens  
Joint freeholders, 25 Lyncroft Gardens

22 October 2018