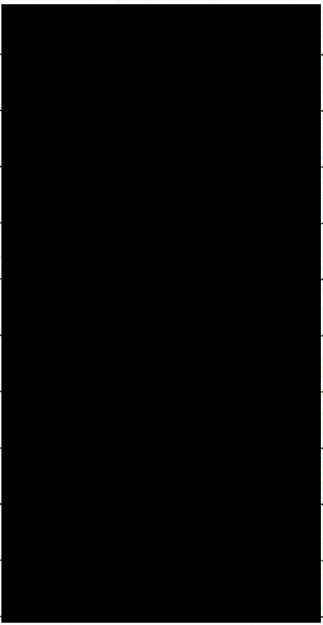
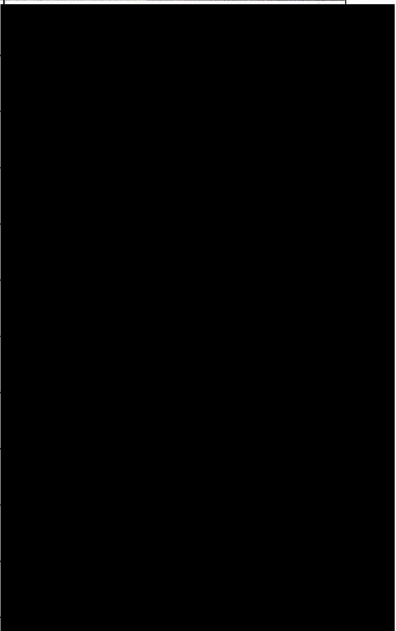


OBJECTIONS TO PROPOSED WORKS AT 33 WILLOW ROAD [PA 2019/5140/L & 2019/5141/P]

VERSION_12112019

PETITION

This document outlines the concerns and objections to the submitted planning application for proposed side extension basement works to heritage asset Grade II listed 33 Willow Road, Hampstead NW3 1TN from Willow Cottages owners and or residents as listed below

ADDRESS	NAME	SIGNATURE
	HILARY KING	
	FARIDEH BROMFIELD	
	ALIEN ROBINSON	
	FRANCES SWAIN	
	PAUL SWAIN	
	SELINA SKIPWITH	
	PAUL BEATSON	
	PEYTON SKIPWITH	
	David Stone	
	Andrew Hewish	
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Preface

This document tables the numerous objections to proposed works at 33 Willow Road, Hampstead, London NW3 1TN [Planning Application 2019/5141/P]

SUMMARY TABLE OF OBJECTIONS

1. The Heritage document analysis 'Balance of Damage' concept is reductionist, piecemeal. It is flawed as it disregards the collective Heritage Asset of Willow Cottages.
2. The submitted design proposal is architecturally poor, out of character and detrimental to the collective Heritage Asset.
3. The proposed side basement extension is over development that contradicts the underlying ethos of the small scale listed Early Victorian Workers' cottage.
4. The proposed accommodation contradicts both applicant's requirements and the small spaces specific to being listed Early Victorian Workers' cottage.
5. The loss of amenity space and loss of deep garden significance that underpins the listed terrace.
6. The vehicular egress is potentially dangerous to oncoming cars and pedestrians.
7. The proposed new boundary wall is out of character and alienating.
8. The proposed new boundary wall and gates are used to mask the poor design of the new side basement extension.
9. The solid timber gates mask the proposed works and are out of character with the listed terrace.
10. The BIA document is seriously flawed in both methodology and use of non-representative data that in turn miscalculates the potential real damage from the proposed works. The monitoring period is non-representative.
11. The structural solution submitted is caveated as being only indicative, incomplete and over-optimistic regarding the real impacts of each of the 4 stages of construction.
12. The architect's drawings are incomplete and contradictory. As such they are misleading, indicative of merely 'intent' and without necessary detail design.
13. The circular rooflights which are intrusive, out of character and undermine the Heritage Asset.
14. The application is wrong to cover both the side basement extension proposal and the outstanding maintenance and repair works to 33 Willow Road. There should be two separate applications.

Note – all of the above objections are elaborated below.

DETAILED OBJECTIONS TO PROPOSED WORKS - Planning Application 2019/5141/P

Context

33 Willow Road is a Grade II listed building. It is also an integral part of the Grade II listed terrace collectively known as 'Willow Cottages'. The terrace including 33 Willow Road was listed on 14 May 1974 [Listing Ref NGR TQ2670985863] and is registered as a Heritage Asset.

The distinct terrace comprising nine cottages are all early Victorian workers' cottages replacing earlier almshouses. The terrace has several distinguishing compositional features which are specific to the listed terrace and its individual members. These features combine to reinforce the historical and cultural importance encapsulated within what is clearly a very special example of early Victorian workers' cottage architecture e.g.

- The highlighted stucco painted front facade with arched sash windows, raised entrance porticos, and ashlar quoined corners to where the front and side elevations meet.
- The change in materials with the more modest and simpler London stock brickwork to the sides and rear coupled with flat soldier arch openings for traditional sash windows and doors.
- The overall 'level' terrace massing is an original design decision which allows for the continuous level of all nine cottages within a constructed trench that is cut and cleverly engineered into the natural slope and topography of Willow Road environs. This horizontality is reinforced with matching height main front pitched roofs in slate.
- The original design decisions consciously locate the terrace in a deep setback position from sloping Willow Road, affording a visual perspective that celebrates the 'single' entity of 'Willow Cottages'. This allows for the deeper perspective celebrating the collective cottages as a single entity.
- Originally Willow Road formed the boundary with the Hampstead Heath proper before the more recent late Victorian development on the north side of Willow Road and Christchurch Hill obscured that direct connection. The original spatial gradation from cottage interiors through formal stucco façade to the deep cottage front gardens onto the public domain of Willow Road and the 'wild' landscapes of the Heath remains an important heritage construct of the special attributes and ethos underpinning the listed terrace as well each individual cottage of the listed terrace. The 'soft' and mostly transparent boundary with original low-level railings and metal gates [e.g. 37-38 Willow Road] coupled with hedges and soft landscaping help to maintain the original visual perspective of the listed terrace.
- The scale of the terrace remains 'humble' in that, on first viewing it seems that the terrace is a modest two stories in height, whereas on closer inspection, each cottage is in fact three floors high with the lower ground / basement floor set at trench level.
- Each cottage envelope reflects the prototypical Early Victorian house profile by way of small interior spaces which are predominantly connected by room-through-room circulation connection. These are small scale workers' cottages that is reflected in the fact that the internal space between party walls is no more than 4.1m.

This is the context in which the proposed works at 33 Willow Road has to be considered. 33 can not and must not be considered in isolation of these contextually identified attributes that underpin the collective qualities informing listed 'Willow Cottages'.

Balance of Damage – reductionist and flawed concept

The report submitted by the heritage consultant has given elements of the building subjectively different levels of historic significance arguing that while there are features in the building that merit grade 2 status there are others that can be readily discarded and demolished without detriment to the status of the building as a whole.

This approach lays the way open to the claim that the new proposed interventions will be of a high standard of design which will elevate and enhance the existing end of terrace house in all respects [e.g. spatially and aesthetically, interiorly and externally, layout and envelope], thus making any and all such proposed interventions acceptable to the appropriate heritage decision takers. This is a simplistic and reductionist approach that helps to post-rationalise the justification of proposed design interventions allowing demolition and alteration under the pretext that all new interventions are of a resultingly high design standard. This approach of 'parts' falsely determines those elements which can be changed and even demolished. There is no meaningful analysis of the listed cottage that correctly deals with the real makeup of 33 Willow Road as an early Victorian cottage including its internal spaces and associated spatial relationships; no meaningful analysis of 33 Willow Road as being part of, and integral to the whole listed terrace; and no meaningful analysis of 33 Willow Road forming the highly important three quarter corner perspective view of the whole terrace when walking up Willow Road.

This is a fundamentally flawed position and argument.

Number 33 does not stand alone. It is part of a grade 2 listed terrace of early Victorian workers' cottages that have been given statutory protection. The whole envelope is of significance, not just the individual parts. Indeed, as the end house, number 33 could claim to be of special importance to the terrace as its side elevation is the one first viewed from the junction of Willow and Willoughby roads. Any proposal to modify number 33 has its effect on its listed "partners". It cannot be viewed in isolation. To do so is a huge folly that undermines the heritage status of these 9 cottages and their setting within an area rich in architectural fabric and designated as an important conservation area under the London Borough of Camden's UDP policies.

Proposed Design – out of character and architecturally damaging

The proposed design is a crude and over simplistic solution that neither enhances this end of terrace house nor, more importantly, the whole group collectively named 'Willow Cottages', of which number 33 forms the visually important and striking singular book-end three quarter perspective as seen from the lower junction of Willoughby Rd and Willow Rd.

The detailed design (e.g. junction of new with existing side, rear, and front elevations), the fenestration (e.g. oversized glazed sets of double doors) and the protruding roof lights (e.g. cylindrical protruding roof lights) are all aesthetically unsympathetic and detract strongly from the current dominant and important three dimensional perspective looking up Willow Rd.

The proposal crudely and insensitively clashes with the heritage qualities embedded in the listed terrace. There is no architectural benefit, no heritage enhancement and no betterment through good design for either 33 or its neighbouring listed cottages. There is only an unacceptable imbalance of "damage" that is detrimental to this grade 2 listed terrace. There is no benefit achieved in terms of cultural and heritage value, of built form and massing, or of any architectural design enhancement.

Spatial Footprint - over development

The proposal increases the spatial footprint and envelope of the existing cottage significantly. The original cottage has an approximate gross footprint area of circa 86m², the proposed new side basement extension adds a further almost 20m². This is an increase of a quarter of the existing footprint [approx. 23%]. It must be remembered that the historic importance of these cottages is not just their special configuration and physical envelope but also the small scale layout of internal spaces. Number 33 is by its very essence a small house, that is a cottage which has small inter-communicating rooms specific to early Victorian and Georgian domestic architecture. These small scale rooms and linkages are seen to exist throughout the cottages that form the Willow Cottage Terrace. The additional awkward semi basement extension affords new space which is excessive in scale and wholly detrimental to the ethos of the listed cottages. This increase in space clearly constitutes overdevelopment and helps undermine these Heritage assets.

The proposal is out of character and degrades the listed status and ethos which underpins and protects the modest internal spatial configuration encapsulated in a terrace of circa 1860 workers' cottages and their setting. The application's basement side extension and internal spatial re-configuration are out of scale and excessive and contradict the essence of these small early Victorian workers' cottages. The spaces are historically by design small in scale and small in footprint allowing for modest need and limited expression.

This must be recognised and protected as the spaces are themselves as integral to the listed heritage status as are all the other stated attributes like the celebrated façade, deep front garden. The additional space forming a new large kitchen diner and a reconfigured layout within the envelope of the main cottage is excessive, overdeveloped and out of character. It damages and undermines the listed status.

Proposed accommodation – illogical and puzzling

Puzzlingly, the proposed schedule of accommodation (2 bedroom and flexible space) does not meet the stated needs of the owner who needs 4 bedrooms to accommodate one adult, two children and a resident helper. Clearly the existing house is too small and given the constraints imposed by the listed status, the logical conclusion would be to look for some more suitable accommodation elsewhere.

It is noted too that under current planning policy that there is planning requirement for smaller accommodation / residential units. This application moves in an opposite direction and in active defiance of all listed heritage characteristics associated with the dwelling and the terrace.

Side Basement Extension – out of character and poor design

The proposed semi basement side extension has its footprint defined by the angular site perimeter. The triangular footprint and resultant internal space generate a difficult and impractical space which imposes functional limitations. These limitations do not allow for an architectural solution of merit which elevates and enhances the heritage status of either number 33 or the collective listed terrace.

The semi basement extension is seen to abruptly abut the existing side elevation and substantively change the existing fenestration by blocking up and rendering the smaller listed sash window. The window is an important element in the listed building. The return render is in contradiction with the aesthetic of the terrace where the only render is located in the primary front elevation and facade.

The listed side extension of number 33 is further restricted by the 3 circular roof lights and their differently sized angled surrounds protruding vertically from the flat roof of the side extension. Again, the roof lights and their surrounds are bulky, overscaled, aesthetically inappropriate and wholly out of character with the listed terrace.

The two sets of tall north facing double doors with their large single panes are energy inefficient and as with the roof lights wholly out of character with the rest of the building. The doors are not materially defined and are drawn in slender profile. Such slenderness can only be achieved by the use of modern materials like steel or aluminium and not by timber. The submitted drawings are seen to contradict the planning advice given in Planning Department letter dated 25 February 2019.

Front Garden - significance & loss of amenity

The importance of the deep front gardens has already been pointed out as being one of the key heritage attributes which underscores the importance of the listed terrace. Number 33 has a deep front garden that returns along the side up Willoughby Road. This space is critical to maintaining the aspect of the three-quarter corner perspective view of the cottage and the terrace.

The proposal claims that no garden will be lost, or that any garden loss will be minimal. This is not accurate. The Design and Access Statement [see ref 5.4] states 37% of the garden will be lost due to the proposed new extension and associated works. This percentage does not include the new hard standings and external stairs which makes the real loss of amenity space even more and closer to 40%. This is clearly unacceptable.

Currently, the whole front garden is visible from many street angles, as well as from the windows of surrounding houses. The side half-basement extension will occupy a substantial part of the side garden, as the proposal concedes. Further, and contrary to the proposal's claims, there is a set of steps proposed which follow the boundary wall on Willoughby Road to the very front of the garden on Willow Road – this will be a substantial and obvious concrete presence, presumably illuminated at night, and providing an odd and unacceptable access and egress point that is out of keeping with the Listed terrace. Why, might one ask, are THREE separate entrances needed for a two bedroom home? Such a configuration reduces areas for soft landscape and amenity which is seen to be even more reduced once the area for car parking is added.

The proposal's suggestion that, on balance, the damage to the amenity is not too great is incorrect. The reinstatement of car parking with hard surfacing is unacceptable as it not only blights the front garden and reduces amenity space, but also contradicts the design ethos of the original cottage and terrace. This is detrimental to the both listed cottage and listed terrace and should be strongly rejected. The front garden should be reinstated, and vehicular parking be omitted.

The existing parking configuration may have been carried out without planning permission in the 1980s as there is no record of any planning permission for the onsite parking and crossover works having been obtained. There is only a record of permission granted by Camden on 26 June 1985 for internal alterations and two new windows [LBC Ref HB/8570104]. As this is part of the listed cottage and listed terrace, and given the importance of the front gardens to the listed terrace, the front garden should be reinstated fully as a garden as was originally designed, There is no statutory limitation for getting approval through long term use when considering unapproved works linked to listed buildings.

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Furthermore, vehicular ingress is dangerous to the public and traffic as the pavement is narrow. The vehicular gate opens across the pavement into the road and oncoming traffic making the corner potentially more dangerous. The narrow pavement has high usage from young school children and parents. Any and all constrictions should be avoided as it potentially forces pedestrians on to the road and into oncoming traffic. Remember too that Willow Road has a high flow of fast-moving traffic as the road is often used as a rat run by drivers trying to circumvent the daily tailbacks along the High Street and East Heath Road going towards White Stone Pond.

The proposal first acknowledges that side extension is damaging, but then seeking to 'balance this out' with other positive contributions (such as basic and routine maintenance like repainting the building). On page 70 of the Heritage Statement, it is conceded that the extension will create an adverse impact on the house – but it then pleads “moderate enhancements” to arrive at a “neutral” impact. Such ‘moderate enhancements’ like the proposed ‘green roof’ to the basement side extension merely adds to the further loss of real amenity space. Also given the obvious dilapidations and lack of routine maintenance to 33 Willow Road and its existing amenity space, there will be a real risk that the green roof which requires a proactive and regular maintenance schedule, will become an eyesore within a short period of time. The tabled contradictory argument for ‘neutral balance’ is a nonsense.

Boundary wall – masking and visually brutal

The replacement heightened boundary wall encloses the garden and car port, and also serves as a retaining wall for the new extension. It argues for legitimacy by masking the proposed detrimental extension from public view. It is as if the architect was saying:- "what the eye doesn't see the heart doesn't grieve over". The harsh higher boundary wall with new visually opaque timber vehicular and pedestrian gates all endeavour to mask the proposed extension from public view. They are a deceit that must not be considered as an appropriate design device. The design of the extension is poor in every way and a boundary wall masking the view of such poor design does not legitimise or justify such an ill-conceived and detrimental proposal.

Additionally, it should be noted that there is a planning letter dated 12 June 2014 to the applicant which clearly advises that any new or replacement gates should be of traditional appearance implying metalwork and see through [extract quote ‘...gates would need to be traditional..’]. The submitted scheme has clearly ignored this advice.

The proposed new brick boundary wall is also higher than the existing boundary wall along Willoughby Road. Additionally, the new wall is formed as a bland and visually harsh barrier that is without any articulated detail. The lower existing boundary wall has piers, brick panels and anti-climb timber trellis, and whilst not perfect by any means, is far more sympathetic and in keeping with the conservation area and surrounding architectural fabric.

The proposed boundary, whilst masking the view of the poorly designed extension, does not allow for the fact that the proposed extension and hard landscaped vehicular area will still be visible on all sides from surrounding dwellings.

Corner location - importance of the three-quarter view perspective

The Willow Cottage terrace has special and unique architectural qualities which are manifest in all its aspects and in its relationship to its site and context as explained in description under ‘context’ e.g. the singular horizontal/level front stucco elevation with corner ashlar quoins, arched front

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windows specific to the front elevation, the excavated “trough” with retaining structures front and back allowing for the construction of a single terrace; the deep front gardens and uniform set back position from Willow Road.

Viewed from Willow Road, the cottages are seen as a singular terrace with a celebrated and articulated facade. The visual impact of this view is the more powerful because of the slope and gradient of the approach up Willow Road towards Burgh House and because of the way the terrace sits at a slight angle to the road. This affords a striking three quarters view not just of number 33 but of the terrace as a whole (see cover image of the Heritage statement). Indeed it could be argued that this corner aspect of the terrace has particular relevance since Willow Road once marked the boundary with the Heath and the land to the side and the rear of the cottages, now Willoughby Road, was until the late 19th century a copse (see O.S. map).

As a footnote to this - George Childs etching “near Downshire Hill Hampstead” is thought to depict the site of the present Willow cottages with the cottages known as “parish cottages” still standing on the site. Note the stream running down between the garden fencing and the “road”. Number 38 Willow Cottages still has an active well in its front garden.

It is therefore, important that the integrity of the listed terrace is retained and that any alteration or extension that damages or diminishes the cultural and historic significance of these modest edifices is rejected.

EARLIER LISTED BUILDING WORKS

Researching the archival records for 33 Willow Road and associated listed works approval, it is seen that whilst 33 to 41 Willow Road [Willow Cottages] were formally listed as Grade II Heritage Assets on 14 May 1974, 33 Willow Road obtained listed works permission for carrying out substantial internal alterations with inclusion of new windows under permission reference HB/85701404/R1 on 2 July 1985. In scrutinising the approved record documents it is seen that there are no statements therein that confirm approval for [1] loss of front garden amenity space with change to suit vehicular parking and associated crossover works; and [2] the formation of the deep concrete footings to the listed side gable wall as discovered by recent invasive trial holes in 2018.

Clearly this is a serious matter if it is found that these works were carried out without necessary statutory permissions. These aspects require urgent clarification.

NOISE, DISRUPTION& DISTURBANCE

The scale of such proposed works will generate unacceptable levels of noise, dust, disruption and disturbance for many months over and above any short and long term damage. It should be remembered that a number of the residents to Willow Cottages work from home during normal working hours.

The excavation works will require a high volume of large lorries travelling to and from site transporting spoils. This will pose potentially dangerous conditions as Willow Road has high footfall from young school children and elderly pedestrians alike.

We are concerned about increased opportunities for crime and burglaries in and around Willow Cottages during works programme as we have been informed by the applicant that 33 Willow Road will be empty after working hours. The site is prominent as it is a corner site.

PHYSICAL DAMAGE & ENGINEERING

The objections specific to the BIA document and Engineering solution informing the submitted design proposal are as described below. Whilst we the writers acknowledge that we are not experts in the fields required to formulate a suitable BIA document, it is understood that [a] Camden will appoint suitable specialists and experts to critically review the applicant's technical documentation during the decision making process, [2] our objection comments are based on a 'common sense' reading of the submitted data by Willow Cottage residents [where some residents have lived in the terrace in situ for over sixty years and others have long professional careers and experience in architecture and construction].

There are a number of grave concerns regarding the core validity of the BIA document. These are described below i.e.

BIA DOCUMENT- Shortcomings and false conclusions

The RSK BIA document submits a 'site specific' study which informs both the Foster's structural solution and the Architect's design proposal. The submitted document includes [a] desk study identified tasks, [b] intrusive ground investigation information from the two 10m deep boreholes and five hand excavated trial pits coupled with data from groundwater monitoring over a seven week period November to December 2018, and [c] analysis of scheme and its impact and risk assessment regarding possible damage from the proposal on the Heritage asset 33 Willow Road and the adjoining properties. The study undermines itself regarding groundwater movement, groundwater levels and damage risks. It also focuses on a non-representative 'seven week' monitoring period which is nothing more than a 'snapshot'. Transferring and interpreting this corrupted and non-representative base data into BIA damage risk analysis is clearly flawed and seriously inadequate.

- **Non-representative monitoring period, Water Levels, Rain and Flood Risk Assessment**

The study states that the ground water was monitored over a seven week period starting circa 21 November 2018.

The study also states that the site comprises a layer of Made Ground approximately 4m from NGL 85.3m garden level [which will be considered as reference datum level for this objection document]. The Made Ground level is over an unconfined shallow layered aquifer comprising of Claygate [approximately 4.2m deep] which is in turn over the lower aquiclude London Clay layer.

The Claygate layer permits the groundwater flow. From the BIA it is seen that during the short 7 week monitoring period starting circa 21 November 2018, the ground water rose 1.8m and stabilised at 1.22m below the bearing level of the deep side gable wall footing that was found during the invasive trial pits. The BIA also states that there was perched water found at level 81.61m level during the same period. The perched water level is approximately 100 mm higher than the deep footing of the gable wall. These readings were obtained during a short monitoring period which is not reflective of annual water levels.

If one looks at rainfall data [Source Met Office-Heathrow] specific to North London over three months October to December one will clearly see that the rainfall readings over the 2018 monitoring period are not a true representation of rainfall [See Insertion_Table of Rainfall 1948-2018] for calculating possible damage to these listed buildings and neighbouring properties. The annual rainfall over the records for 71 years from period 1948 to 2018 shows that 52 annual readings were higher than the annual reading for year 2018 i.e. 73% of 71 years were higher than

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2018! Furthermore, when focusing on the 7 week snapshot period [taking October-December period], it is seen that 63% of the 71 years are higher than the rainfall for the October to December snapshot period of 2018! The rainfall table speaks for itself.

The monitoring period is clearly too short and not reflective of real in situ conditions, it should be longitudinal, it should be adjusted to include long term period means, and extremes and deviations should be considered in order to get a more correct figure for informing damage analysis.

Furthermore, the rainfall readings for groundwater and flooding risk assessment should also not be defined on an over-optimistic 1:100 year risk profile. The flood risk should be similar to the more cautious flooding risk assessment period as applied to the recent analysis relative to the upgrading works to Hampstead Heath ponds i.e. 1:400 year profile. The non-representative readings invalidate any and all damage risk analysis results of the submitted BIA document. The inadequate snapshot does not make suitable safety adjustments to respond as best as one can to climate change which the Met Office recognises as being a critical factor impacting on our weather patterns.

Contrary to the BIA document and its various incorrect statements therein, it is seen that the terrace with its lower ground floor circa 83.36m FFL is in fact vulnerable to flooding. It is fact that [1] the listed terrace properties were flooded in 2002, [2] that the water table is higher than stated in the BIA document [e.g. the water table level as measured in lower front planter of 39 Willow Cottages is only some 500mm above the common LGF FFL]; [3] 38 Willow Road has one of the original water wells in the front garden which is still active and which formed part of the chain of historic wells along Willow Road; and [4] the Listed cottages have underground water flows below the terrace from tributaries of the Fleet that flow down from higher immediate surrounding areas of Old Hampstead naturally converging on Willow Road down to the lower ponds at South End Road and beyond [see Insertion_Extract1866 OS showing wells along Willow Road].

This is important as the Heritage Asset of Willow Cottages must be appropriately protected. The BIA offers an inaccurate 'snapshot' which belies the real conditions that should be considered. The BIA is shown to be flawed and inaccurate and is therefore not fit for purpose.

- **Damage from displacement of no fines**

It is accepted that the existing footings are seated on historic well compacted soil. It is known too that [1] the Listed terrace that is physically linked to 33 Willow Road is constructed with poor and fragile materials; [2] the terrace acts physically and structurally together as a single entity; [3] the existing and undisturbed footings and loading lines [apart from deeper side gable footings of 33 Willow Road] are shallow and set marginally below the LGF FFL; [4] the front stucco elevation due to the asymmetrical structural opening solid-void pattern and relationship is particularly fragile; and [5] the existing water table levels to the terrace are higher than has been estimated or stipulated in the BIA document. Any and all changes to ground water flow through the Made Ground or aquifer layer will result in removal of no-fines from the bearing soils to the historic footings. The magnitude of this potential displacement and damage impact needs to be carefully and correctly assessed as any such differential structural movement will be detrimental to not only 33 Willow Road but proportionally along the Listed terrace.

This concern is made more urgent by the fact that there is no clarity about the exact positions of the out of character deep [81.52m bearing level] footing to the side end gable wall of 33 Willow Road. There is no investigative data showing the bearing levels of the other loadbearing walls

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relative to 33 and including 33-34 party wall. Such base data information is critical in helping to formulate a proper solution that mitigates against the risk of damage.

- **Report 01 regarding trial holes and associated proof of data**

The BIA makes mention of the first report that collects and shows the captured data, locations etc of the trial pits and boreholes. This information [Report 371691-02[00] November 2018] should be included as an appendix in the submitted BIA document. Not to have included it is an unacceptable oversight in terms of correct methodology.

- **Sequence of works, damage at each stage**

The BIA does not offer any analysis of potential damage caused during the different works stages of the structural engineer's methodology and 4 stage construction programme.

ENGINEERING SOLUTION – Indicative and incomplete

The engineering solution underscoring the architectural design of the proposed side basement extension is stated by the engineers themselves on their drawings as being 'indicative'. Their structural solution has been determined by information described within the associated RSK Basement Impact Assessment [BIA] Report 371691-03[01] dated 31 July 2019.

Foster Structures 'indicative' structural solution is seen simply to be an open ended chamfered reinforced concrete box that takes its shape from site boundary constraints. The chamfered box has an indicative steel and timber flat roof with different diameter circular rooflight openings and a large opening to the north elevation for glazed door sets. The reinforced concrete base slab is connected to and sits on fourteen concrete mini-piles that are driven from NGL 85.30 level down to suitable [and as yet unspecified] depth through made ground, through the aquifer Claygate layer and into the London Clay formation which starts approximately 4.2/4.9 m down at nominal level 80.42/81.12. [BIA Table 2 Page7]

The Claygate layer itself varies in thickness and is approximately 5.1-5.8m deep based on 10m borehole depth.

- **Structural Scheme 'Indicative' status**

The drawings and all 'general notes' therein are all described as being 'indicative'. A complex basement submission as this application, should not be 'indicative' but designed and calculated to a proper design level which allows proper scrutiny and decision making. It should not be an 'intention' but a precisely defined and detailed scheme. Anything less is incomplete.

- **Sequence of works and damage at each stage**

The Engineers submit a 'four stage' construction methodology. Each stage is simply defined without necessary clarifications as there are very real and grave concerns with tasks and sequencing. This missing detailed information undermines the correct duty of care for ensuring the protection of a heritage asset.

The sequence of the engineering and construction tasks are critical to safety and continued stability of the listed buildings as the excavations will expose and destabilise the existing house and terrace; the existing footings will be undermined by the new floor construction requirements causing destabilisation of the listed buildings; the piling process will cause damage to the listed buildings by way of the pounding and shockwaves impacting on the fragile listed materials and structure.

1. **Stage 1 – installation of temporary sheet piling** : The documents do not say how the sheet piles are to be installed, how deep they need to be driven down and how long the installation process will take. There is also no information defining the impact of driving the sheets into position, as well as the impact from the sheet piling vibration on the fragile listed house and terrace.
2. **Stage 2 – forming new piles** : the scheme suggests that 14 number piles will be constructed from existing GFL 85.30m down through the Made-up ground layer past new slab bearing level approx. 82.30m level, down into the Claygate layer starting at level 81.00m. Again, there are a number of real concerns and lack of precise information. The depth and length of the piles is not stated as this impacts on noise, vibration duration and ground water flow. The piles are driven down by mechanical pressure from the higher level 85.3 and are to a nominal length of approximately 5-6 m which are cut to new slab level once stage 3 excavations are completed. Piles P1 to P6 are some 400mm away from the listed gable wall. This is extremely close. The mechanical hammering process associated with piling and mini-piling rigs will cause serious vibrations impacting and damaging the entire length of the existing listed side gable wall brickwork below and above ground. Neither the engineers nor the BIA experts acknowledge this obvious serious problem and source of damage.
3. **Stage 3- Existing ground inside the propped sheet pile walls to be excavated down to new lower ground floor level and new lower GF concrete slab poured** : Again this stage is without proper and detailed clarification. There is no explanation of either how the soil is to be excavated, what machinery is to be used, what protections are to be provided in ensuring that the fragile listed gable brickwork remains undisturbed.
4. **Stage 4 – Permanent RC retaining walls built etc with temporary sheet piling removed** : Here too there is no detailed information on how the temporary sheet piling is to be removed without undue vibration and damage. It is acknowledged that this will be less damaging at this stage as the RC 'box' will have been formed. Nevertheless such information is necessary for ensuring a proper duty of care is achieved for heritage asset protection.

- **Existing Movement cracks and Damage**

The engineers have identified and scheduled movement cracks to all windows in the stucco rendered front elevation. They have acknowledged that this damage is due to movement and have offered helifix remedial solutions to these areas.

Clearly these cracks which occur at the weakest points [about structural openings] are due to movement deterioration within a construction makeup of poor and fragile materials that inform such buildings and building types. The drawings do not ascertain if there are similar patterns of cracking on the side and rear elevation, there is only a proposed schedule of making good the much-needed superficial finishes repairs in the architects drawing series. This clarification is missing.

- **Missing and incorrect information**

The engineering solution has utilised data and information from the BIA document. Whilst this may be appropriate if all the data within the BIA document is sound. Please see above section which raises real concerns about some data informing the BIA analysis.

It is noted that the listed side gable wall is supposedly to have a deep concrete footing with founding level some 1.84m below the Lower Ground Floor FFL of 83.36. This is fortuitous and advantageous to the applicant. However, there is no further clarification of the foundation bearing level and foundation depths of the front elevation, the rear elevation, and the dividing loadbearing masonry wall. It has been suggested that the party wall footing 33-34 Willow Cottages is at 83.2m level. This is 1.68m higher than the gable footing base level and only approximately 160mm below the FFL of the Lower Ground Floor at 83.36m level!

The footing depths to these walls and loadbearing walls within the other listed terrace dwellings is much less and in keeping with the shallow depth below the LGF FFLs throughout the terrace. This is important as the higher existing footings are currently stable and sit on well compacted and historic soils. The old historic footings are all approximately 900mm higher than the proposed new side slab with piles [Slab bearing GL at 82.3m]. These levels need to be investigated and included in both the engineering solution and the BIA analysis. The side footing levels need to be clarified and analysed for potential damage and displacement from changing below ground water patterns causing the removal of no-fines particles from existing soil base.

- **Damage from Piling vibration**

The process of piling causes severe vibrations and shock waves that will damage No. 33 as well as the terrace to diminishing degrees. The listed cottages are structurally fragile and formed by Victorian materials and construction methods which are less robust in material strength, less robust in bond strength and less robust in structural bearing of support elements like timber beams and floor joists et al, than modern newer built housing – even more so as the Willow Cottages listed terrace is a terrace originally constructed for workers and their families and where lesser grade materials and minimal loadbearing configurations were achieved that would not be allowed under modern criteria and regulation.

ARCHITECTS DRAWINGS - incomplete, contradictory and with shortfalls

The submitted Architects drawings for the proposed works are inadequate, incomplete and with numerous discrepancies and contradictions.

It is reasonable to expect a higher level of submitted information for a planning application specific to a listed grade II building as there is a much greater responsibility and duty of care required in order to ensure the continued integrity of cultural and historical merit informing such listed architecture.

Apart from numerous inconsistencies, there is a fundamental lack of any detailed design of critical junctions between 'old' and 'new'. This paucity of detail design hinders the ability to comprehend the full impact of the proposal.

In our view the submitted drawings fail to meet the necessary level of detail that is required, and the proposal should be rejected on the basis of paucity of detailed information and not just on the dubiousness of the proposal itself.

The following lists some examples of discrepancies and contradictions seen on the submitted drawings i.e.

OBJECTIONS TO PROPOSED WORKS AT 33 WILLOW ROAD [PA 2019/5140/L & 2019/5141/P]

Drawing 055_PP_13 Section JJ

- Dimensions to the basement side extension are contradictory.
- No depth is given to the new RC side basement slab construction. It measures approx. 500mm excluding finishes.
- The drawing gives no indication of real excavation levels for the new slab and its construction e.g. insulation, blinding, hardcore, real NGL [natural ground level to excavated level]. This may well be another 500mm below the drawn slab. Such depths abutting the house will expose and undermine the shallow and fragile side footings of the listed cottage and terrace.
- There is no detailed information of this area or junction, merely a diagrammatic line drawing profile.

Drawing 055_PP_09 Section JJ

- The interior interventions of glazed circular fixed light and modern steel stair to basement level are out of character with the early Victorian workers cottage aesthetic.

Drawing 055_PP_08 Section DD Gable Wall

- The cast iron fascia depth of 400mm contradicts drawing 055_PP_13 which shows the same fascia having a depth of 600mm.
- The new RC side basement slab construction measures approx. 500mm excluding finishes and differs from thinner slab to the new lightwell shown on Section BB drawing 55_PP_06. Which drawing is correct?
- Again, the drawing gives no indication of real excavation levels for the new slab and its construction e.g. insulation, blinding, hardcore, real NGL [natural ground level to excavated level]. This may well be another 500mm below the drawn slab. Such depths abutting the house will expose and undermine the shallow and fragile side footings of the listed cottage and terrace.

Drawing 055_PP_02 Proposed Ground Floor Plan

- The plan does not show how the new vehicular gates open. Currently the gates are dangerous as they open across the pavement and into Willow Road. This causes blockages to pedestrians and cars. Remember that the pavement is already narrow and is well used by numerous school children and their parents etc.
- The plan shows possible vehicular positions. It does not show a clear distinction between hard and soft surfaces given the importance of the front garden and its integral symbolism of the listed terrace.

Drawing 055_EE_08 Existing Side Elevation, Section DD

- This shows the existing side elevation with various maintenance and needed remedial works tasks and descriptions. One such task states that the lower right-hand side window is to be modified i.e. 'existing non original side window sill raised marginally and new fixed light added'. Drawing 055_PP_08 proposed Section DD gable Wall part shows the proposed new fixed light window and yet drawing 055_PP_11 proposed Section GG through Willoughby Road states that the 'existing non-original window rendered blind in salvaged brick to match existing gable'. This not only contradicts other submitted drawings but is also confused construction as the structural opening is either render finished or exposed brick, not both.

Drawing 055_EX_03 First Floor Plan

- There are two drawings with the same title and number but different drawing information. One is clearly a first floor plan and the other is a roof plan.

OBJECTIONS TO PROPOSED WORKS AT 33 WILLOW ROAD [PA 2019/5140/L & 2019/5141/P]

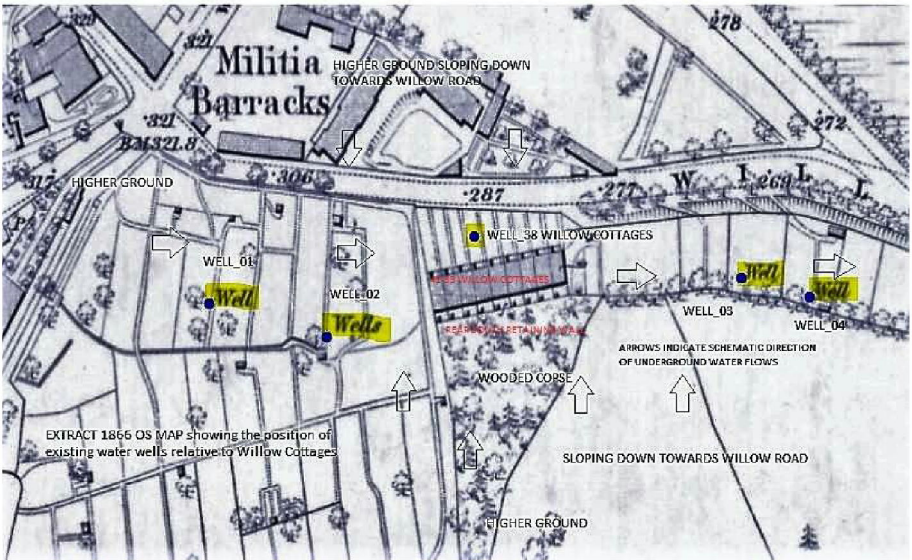
Drawing 055_PP_12 Section JJ

- This drawing shows the new proposed boundary wall with new gates. Drawing 055_PP_11 shows the boundary wall along Willoughby Road. This drawing shows the position of the existing wall with piers etc profiled in faint dotted line. The front section existing boundary wall outline in drawing 055_PP_12 has been omitted. Such simple drawing omission makes an evaluation more difficult.

END

OBJECTIONS TO PROPOSED WORKS AT 33 WILLOW ROAD [PA 2019/5140/L & 2019/5141/P]

Insertion_Extract 1866 OS map showing water wells along Willow Road relative to Willow Cottages



Insertion_Table of Rainfall 1948-2018 [Extract]

[illegible]