

74 Lawn Road  
London  
NW3 2XB

28 March 2020

**Re: Planning application 2020/0348/P at 76 Lawn Road, London, NW3 2XB.**

Dear Elaine Quigley and Camden Planning,

We are writing with comments regarding the proposed redevelopment at No.76 Lawn Road, which includes a basement excavation.

On Lawn Road the houses are numbered sequentially on the same side of the street:

- We own and live at 74 Lawn Road.
- Next door to us, and sharing an 11 metre party wall, is 75 Lawn Road. At Camden's Planning Committee meeting on 20 February 2020 councillors voted to give planning permission to 75 Lawn Road for their part-demolition, basement excavation, and rebuild redevelopment project (application 2018/2136/P). The formal approval has not yet appeared on the Camden Planning website, as of 28 March 2020.
- Now the adjoining house at 76 Lawn Road, which shares a party wall with No.75, has applied for permission for a similar part-demolition, large basement excavation, and rebuild redevelopment project. No.76 has pre-existing structural issues. The current owners purchased this house in February 2020.
- No.77, adjacent to No.76, carried out a part-demolition, large basement excavation and rebuild project that took place during 2018/2019.

Our comments on 76 Lawn Road's application are in the context of the unusual situation where two houses next door to each other (Nos. 75 and 76), one of which shares an 11m party wall with us, both intend to carry out basement and rebuild developments.

Our concerns relate to the need for Camden to consider cumulative impacts and to sequence the works so that the projects at Nos 75 and 76 are not carried out simultaneously or with any major works overlapping. We focus on two areas:

1. Cumulative impact on neighbours of two adjacent basement projects.
2. Sequencing of work at 75 and 76 in the context of Campbell Reith's audit of No.75's Basement Impact Assessment and the impact on our house.

At the 20 February 2020 Planning Committee meeting we raised the question of the sequencing of works at Nos.75 and 76. The Chair, councillors and officials decided that this would have to be considered as part of the No.76 application, which at that point had been submitted but not registered. You will find this exchange on the recording.

**Background**

Given the pre-existing structural issues at No. 76, when considering No.75's Basement Impact Assessment (BIA) Campbell Reith was concerned to ensure that the structural integrity of No.76 was protected during No.75's

works. As detailed in the published BIA documents<sup>1</sup> for No.75's planning application, including in the BIA Addendum, and reiterated in the deputation letter<sup>2</sup> submitted to the 20 February 2020 Planning Committee by Nash Baker (architects for No.75), it was agreed with Campbell Reith that only two measures needed to be implemented to stabilize No.76 before the No.75 development:

1. Crack Repairs – using horizontal steel reinforcement bars [Helifix bars] to repair the crack adjacent to the front door of No 76.
2. Underpinning - of the party wall between 75 and 76 Lawn Road.

On 1, this is minor work and does not involve any excavations.

On 2, this underpinning was already part of the proposed No.75 works. This point is only saying that the previously planned order of works has been changed so that this section of underpinning is carried out prior to all other basement works.

This was the basis on which Campbell Reith accepted the Ground Movement Assessment reports submitted by No.75 Lawn Road. It was also the basis on which the Planning Committee approved No.75's planning application.

These details were available on Camden Planning's website in the run-up to the 20 February Planning Committee and no dissenting opinion was submitted by No.76. The new owner of No.76 had a written submission to the Planning Committee supporting No.75's plans and saying they "have been fully consulted on the applications by our new neighbours who own number 75 Lawn Road and have been made aware of their proposals".

The Nash Baker submission to the 20 February 2020 Planning Committee also stated: "There are no plans for the two sites to be developed simultaneously, and indeed the applicants for no. 75 have not yet seen no.76's plans."

Thus, according to published documents, Nos.75 and 76 and Campbell Reith have agreed on the two measures (steel reinforcement bars in one wall and the new timing of one area of underpinning) necessary to stabilize No.76 for the duration of the works at No.75, as described in the No.75 BIA documents.

**No one has ever suggested that any additional works beyond those mentioned in the No.75 BIA documents will be necessary at No.76 during the period of works at No.75.** This is important because our two areas of concern both relate to the sequencing of the works at Nos. 75 and 76.

### **1. Cumulative impact on neighbours of two adjacent basement projects.**

Camden Planning is aware of the impact on neighbours when more than one development takes place in close proximity at the same time. This concern is behind its new Cumulative Impact Area (Central London) Statement & Checklist, which describes issues that arise from having more than one development in one area.

Lawn Road is a peaceful residential street. We respect homeowners' rights to development and also know that No.76 is suffering from structural problems that in the medium term require significant works.

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<sup>1</sup> Available on the Camden Planning portal.

<sup>2</sup> Nash Baker submission to Planning Committee on 20 February 2020, page 8-10

<http://democracy.camden.gov.uk/documents/b26230/Supplementary%20Agenda%2020th-Feb-2020%2019.00%20Planning%20Committee.pdf?T=9>

However, it is the people who live on the street, unlike the owners of the vacant properties intending to build basements, who have to live through the very disruptive experience of a major demolition, largescale excavation, earthmoving, and rebuild project.

On our section of Lawn Road we experienced the impact of the No.77 basement and rebuild development (2018/19). It is not going to be tolerable for two similarly largescale excavations and developments to take place at the same time or with overlapping major works.

The two Construction Management Plans for No.76 and No.75 make no mention of each other's basement developments and both assume there are no concurrent works next door to each other. They both envisage many hours of drilling every day and multiple lorry deliveries/collections every day. A combination of what each is predicting during site work will result in a level of disruption and noise that will not be reasonable for neighbours to endure. At least when there is only one basement/rebuild development underway at one time there are days and periods when there is less noise and disruption. Two developments at the same time will allow no respite.

How will the promised maximum noise levels be implemented, for example, if there are two separate projects underway next door to each other at the same time? Both CMPs will set maximum decibel levels for noise and maximum dust levels at the boundaries of their sites. But these permitted thresholds will be meaningless if works are concurrent and the rest of us are subjected to the combined impact. Each site will be able to blame the other for any breaches in agreed levels of noise, dust etc.

**We have no objection to the design aspect of the plans submitted by No.76 in their application. But we object to planning approval if Camden does not take cumulative impact into account. Camden should set a condition that the developments at Nos. 75 and 76 cannot take place simultaneously or with major works overlapping.**

Separately, we request that there are no works on Saturday morning that can be heard in our house and that a Construction Working Group be set up to liaise formally and regularly with neighbours regarding any concerns.

## **2. Sequencing of work at 75 and 76 and Campbell Reith's assessment of No.75's BIA and damage predictions relating to our house.**

Under the current planning applications this stretch of Lawn Road will end up with 3 basements in a row (Nos. 75, 76, 77).

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

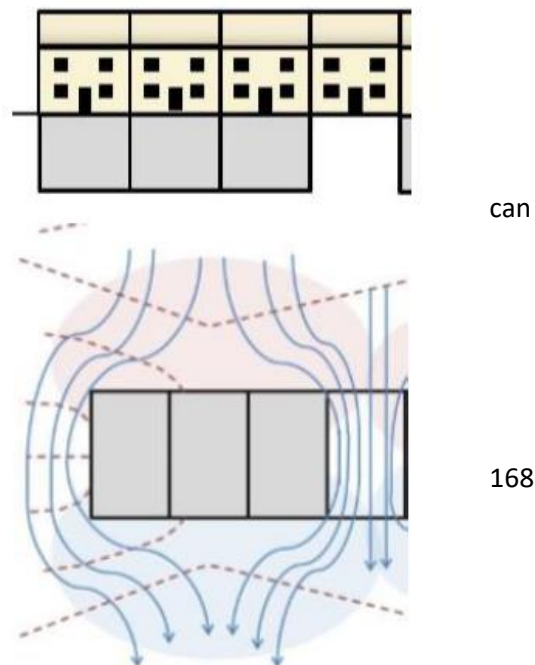
- Page 214, Policy A5 Basements: "The Council will require applicants to demonstrate that proposals for basements avoid cumulative impacts;" (point p)
- Page 217: Para 6.124: "Cumulative impact: The cumulative effect of several underground developments in close proximity can be more significant than 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.”

Similarly, the 2018 Camden Planning Guidance on Basement developments states:

**Cumulative impacts of basement development**

4.34. The cumulative effect of the incremental development of basements in close proximity, particularly when these are large, potentially create a significant impact. Therefore Basement Impact Assessments must identify neighbouring basements and make the assessment considering all nearby basements. Both existing and planned (with planning permission) underground development must be included in this assessment. To ensure cumulative impacts are considered Basement Impact Assessments must respond to the issues raised in paragraph to 174 of the *Camden Geological, Hydrogeological and Hydrological Study*<sup>3</sup> (see, for example, excerpted Figure 1 regarding water flows from multiple basements).



**Figure 1: Camden Geological, Hydrogeological and Hydrological Study (excerpt).**

These policies present a challenge for the developments at Nos. 75 and 76. When No.75 first submitted its planning application it could not have known that the next door house would also put in a planning application for a basement before No.75 had even secured planning approval for its own basement. So, contrary to policy and guidance, the No.75 BIA does not include “existing and planned” nearby underground developments in its assessment.

No.76 was familiar with the application at No.75 when it made its application for a basement.

**Our concerns arise because the Basement Impact Assessment document for No.75 has been written, and the engineering analyses carried out and audited by Campbell Reith, on the assumption that there will be no other large earth moving activities or major building works taking place at No.76 (or any other nearby site) at the same time or soon after. In No.75’s assessments of potential damage/impacts to our house at No.74, there is no consideration of potential cumulative impact from works at No.76 or of the impact of eventually having 3 basements in a row (Nos. 77, 76, 75) built within a short space of time.**

**Regarding the BIA for No.76, will Campbell Reith consider all the potential cumulative impacts regarding excavations at Nos 75 and 76 and the overall impact of eventually having 3 basements in a row?**

<sup>3</sup> <https://www.camden.gov.uk/documents/20142/2247044/GHH+study.pdf/12f5a776-e382-21fe-8dbd-04ea4db575b3>

We note that, as stated in No.76's Heritage design and access statement (page 9) where they quote the conclusions of structural engineer Alan Baxter, one of the three main reasons that led to the current condition of No.76 was "The construction of the basement to 77 Lawn Road."

The Ground Movement Assessments for the No.75 basement application, including the predictions of damage to our house at No.74, and planning approval for No.75, were based on this implied sequencing of works:

- First, the Helifix steel bar crack repairs to the one wall next to the front door at No.76 plus early underpinning of the No.75/76 party wall.
- Second, the completion of all excavations and rebuilding works at No.75, as approved under application 2018/2136/P.
- Third, any proposed redevelopment works at No.76 (or any other nearby house), depending on what planning application is approved.

**Our concerns relate to various possible scenarios, for example:**

- **A situation could arise where basement-deep excavations and rebuild works are permitted to take place simultaneously, or near-simultaneously, at Nos 76 and 75, even though the cumulative impacts were not considered in the No.75 BIA.**
- **Alternatively, Camden may agree with us and neighbours that major works should not take place simultaneously at Nos. 75 and 76.**

**Under either scenario there will be potential cumulative impacts.**

**We request that Camden should ask Campbell Reith to review the potential cumulative impact on our house in the context of any concurrent excavations/rebuild at No.75 and 76 and in the context of there now being 3 recently excavated basements in a row next door to our house.**

**In addition, we request that any approval conditions for No.76 should be explicit about the required sequencing and we ask Camden to consider the views of neighbours that concurrent major works should not be permitted.**

Thank you for considering our comments,

Teresa Poole and Richard Tomlinson

74 Lawn Road