

# OBJECTIONS to Planning Application 2020/0927/P: 31 Willoughby Road NW3 1RT

FAO Planning Officer Thomas Sild [email [thomas.sild@camden.gov.uk](mailto:thomas.sild@camden.gov.uk)]



REGISTERED HERITAGE ASSET WILLOW COTTAGES – view from Willow Road showing the stucco painted front terrace elevation

24 April 2020  
Glen Robinson  
39 Willow Road  
Hampstead  
NW3 1TN

This document registers my personal concerns and objections to the submitted planning application for proposed basement works to 31 Willoughby Road, Hampstead NW3 1RT

## SUMMARY OBJECTIONS

There are FIVE main areas for objecting

1. **The application abuses the planning process and tragically wastes scarce council resources - especially given the current context of the Covid-19 Pandemic**
2. **Damage to Heritage Assets Willow Cottages and Lower Retaining Wall [LRW] from different aspects of the proposed works**
3. **Contradicts Camden Local Plan Planning Policies**
4. **Contradicts Hampstead Neighbourhood Plan Policies**
5. **The objections and the potential tabled under the withdrawn application scheme, remain relevant and are pertinent to this application as the new application is in essence the same**

More specifically

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1. The proposed scheme remains effectively the same in footprint and extent as the withdrawn scheme submitted under planning application 2016/7146/P. It must be remembered that the 2016 scheme was only withdrawn by the applicant after being informed by LBC Planning that it would be refused planning permission. This was after almost two years of numerous revisions and clarifications.
2. Our tabled objections identifying critical routes and crunch points for damage to the Heritage Assets of Grade II Listed Willow Cottages and the lower rear boundary retaining wall remain unchanged and unresolved. In fact, the new application scheme offers additional critical routes and crunch points for damage.
3. This application, once again, will clearly damage not only the Heritage Assets of the Grade II Listed Willow Cottages and the Grade II listed lower rear boundary retaining wall, but also the abutting neighbours on either side of 31 Willoughby Road.
4. There is real risk of substantial damage and decreased protection to registered historical Heritage Assets which LBC is legally bound to adhere to under current legislation. This possible public loss of heritage fabric is one sided, unfair and unreasonable as it is at the sole gain of the applicant who offers nothing of benefit to the public domain nor to the historical and cultural fabric that Listed Willow Cottages does. It should be remembered that [a] the proposal directly abuts and impacts five of the nine listed cottages, [b] the listed terrace is known to be of fragile construction in terms of structure and materials, and [c] are structurally interlinked. This means that the proposal will differentially impact and damage not just the 5 abutting heritage structures, but also the whole terrace. Camden therefore must consider their responsibility carefully as there will be real potential and differential damage to the WHOLE heritage asset which must, by law, be protected for the greater public.
5. The application contradicts numerous 'Camden Local Plan' Planning Policies e.g. D2\_7.41, D2\_6.143, A5\_a to e, A5\_6.131, A5\_6.124, A5\_6.125, A5\_6.127.
6. The application also contradicts many of the adopted Hampstead Neighbourhood Forum document policies e.g. DH2\_3.10, DH2\_3.12, DH2\_3.18, BA Section 5\_5.5
7. The proposal is overdevelopment.
8. The Eldred Geotechnics BIA document is not credible and should be considered as invalid. The document seeks to provide appeasement with conclusions and statements that support the validity of their client's scheme through the use of false narratives, false statements derived from false assumptions and false premises, less than robust data and contradictions.
9. This false narrative is further reinforced by utilising associated consultant drawings which [1] do not correctly reflect 'as existing' site conditions and junctions with abutting listed neighbours, [2] show wrong abutting site conditions to listed structures; [3] do not show ANY clear critical dimensions of the real proximities of new construction elements and new excavation zones to abutting Heritage Assets; and [4] are again as flawed in omitting critical information, as those drawings submitted with the earlier and similar withdrawn 2016/2018 scheme.
10. The proposal and documentation are without crucial detail and do not address the full aspect of implementation. The rear of the site is small, confined and without direct access. There is no description of how each of the construction tasks will be undertaken e.g. safe protections, safe support and shoring of abutting heritage assets without damage, installing piling rig and piling equipment, process and safe sequence of excavations, containment of groundwater during sequential excavations, safe containment of ground force energy dissipation from piling vibration so that there is :

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- a. no damage to the different heritage Asset structures,
  - b. proper and safe protection of existing drainage runs to the rear of Willow Cottages as well as 33 Willoughby Road [NB 33 Willoughby Road have had numerous leaks and seepage to foul water drains caused by earlier 31 Willoughby Road site investigative works].
11. Due to proximity and site configuration, the proposed works will cause months of excessive noise, dust and disruption not just to Willow Cottages but also to abutting and surrounding neighbours. It will also cause dangerous traffic conditions from high levels of large haulage trucks moving to and from site – noting that Willow Road is frequented by a number of school children going to and from schools in the area.
12. The cumulative impact of this basement proposal when viewed against (a) the sloping topography and lower valley formation of Willow Road, (b) the underground water subsidiaries of the Fleet (c) the existing lower ground level of Listed Willow Cottages, and (d) the known impacts from the other basement development in the immediate area, will:
1. add unacceptable levels of further damage,
  2. more changes to ground water flow directions resulting in more flooding to numerous lower properties which are predominantly in the main part of dense Victorian terraces with lower ground floors / semi basement, and
  3. more damage due to soil bearing reduction by way of fines removal.
13. The proposal causes conditions of unacceptable levels of overlooking from the new rear habitable room [reception] into habitable rooms of 39 and 40 Willow Road as well as unacceptable overlooking into rear terrace amenity spaces of 40 and 41 Willow Cottages. It also allows for loss of amenity through unacceptable levels of overlooking into the lower rear amenity of 37, 38 and 39 Willow Cottages. The proposal contradicts Camden Local Plan Policy A5 item [q] and HNP policy DH1 item [d].

## ELABORATION OF SOME KEY OBJECTIONS AS LISTED ABOVE

**ELABORATION\_01 Re-submission** : It must be remembered that the 2016 scheme was only withdrawn by the applicant after being informed by LBC Planning that it would be refused planning permission. This was after almost two years of numerous revisions and clarifications. There were a large number of registered objections to the application from across all sectors of the community including community-based organisations.

If one compares the proposed scheme with the withdrawn scheme submitted under planning application 2016/7146/P, one will see that the new basement plan is identical in perimeter and footprint to the withdrawn scheme. Whilst the footprint remains exactly the same as the withdrawn scheme, the proposed new scheme is in fact much worse and will cause even more damage to the various heritage assets by way of inserting a row of 6 no. x 450mm diameter piles in the rear garden that are no more than three quarters of a meter apart and less than 1 m from the rear face of the listed retaining wall.

The application should be refused on these grounds given i.e.

- a. the new application scheme is fundamentally the same as the earlier withdrawn scheme,
- b. the withdrawn scheme was to be refused if it had not been withdrawn as it was found to be unsound,

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- c. that the applicant has knowingly made such a re-submission which also includes more elements that are potentially even more damaging to the abutting heritage assets [i.e. rear garden piles] than the earlier withdrawn scheme; and
- d. that Camden Council are being forced to consider this application at a time of extreme constraints with severe strain on scarce resources due to the Corvid-19 pandemic.

**ELABORATION\_02 crunch points:** From the submitted drawings [e.g. G1808-PA-101-E1] one will see that the critical routes and crunch points for damage as identified in our submitted objections to the scheme under withdrawn planning application PA 2016/7146/P are **exactly** the same, albeit now worse due to the additional row of 6 no. x garden piles.

Our tabled objections identifying critical routes and crunch points for damage to the Heritage Assets of Grade II Listed Willow Cottages and the lower rear boundary retaining wall remain unchanged and are unresolved i.e.

- North Face Retaining Wall
- North-West Corner Junction of New Dining area
- North-West Light Well Corner Junction

In fact, the new application scheme is worse as it now includes an additional critical route and crunch point for impact and damage i.e. the close proximity of the row of 6no. x 450mm diameter piles set less than a metre from the face of the listed rear retaining wall which will impact directly on the rear listed structures of 38-39-40 Willow Road.

This is made all the worse as the submitted argument that these additional piles in the rear garden will resolve the dangerous conditions relating to the existing rear boundary is factually incorrect.

One must note that:

- a. the dangerous boundary conditions that exist are caused SOLELY by the excessive loading from the raised garden of 31 Willoughby Road with unfounded upper wall that takes its illegal support from the lower fragile listed retaining wall that has been shown to have only stone flags as a foundation;
- b. this dangerous condition is not due to the approved removal of external sheds at 39 Willow Road as suggested by Eldred Geotechnics, but which in fact correctly exposed the real scale of damage and danger caused by the ill-conceived raised garden construction of 31 Willoughby Road; and
- c. the process of piling will in itself seriously damage the fragile existing constructions of the Heritage assets [both lower rear retaining wall and terrace house] linked directly to 41- 40 -39 - 38 Willow Road through the excessive lateral vibration that is commonly associated with piling.

It is clear that neither the applicant nor their consultants have any clear understanding of the complexity of the conditions which need to be grasped in dealing correctly with fragile registered heritage structures. Given the omission of critical and crucial dimensions coupled with false statements of fact implies professional disregard for safe and proper analysis and resolution. On this basis the application should be refused.

**ELABORATION\_03 Camden Local Plan:** The application contradicts numerous policies and guidance positions within the Camden Local Plan and as such should be refused permission. The policies and guidance positions that the proposed scheme contradicts are i.e.



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**Policy D2 – Heritage** : paragraph 7.41 clearly states *‘that under the Planning [Listed and Conservation Areas] Act that the council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas’*. It is seen that the proposal threatens the registered heritage assets of Grade II Listed Willow Cottages and Grade II listed lower rear retaining wall through damage from the proposed basement excavations, piling, new concrete retaining walls that are within millimetres of the heritage assets in question.

Camden Local Plan item 6.143 ‘Listed Buildings’ clearly states *‘The Council will only permit basements where they do not cause harm to the significance of a listed building or its garden. Listed buildings often form an intrinsic element of the character of conservation areas and therefore basement development which harms the special architectural and historic interest of a listed building is also likely to fail to preserve or enhance the character or appearance of the conservation area in which it is located...’*. Due to the sheer proximity of the proposal with its abutting works and suggested forms of construction, it will cause severe damage to the fragile listed structures and will also modify the groundwater flows. Modified ground water flow directions will in turn undermine existing soil stability by removing the fines from the bearing soils of Willow Cottages which have shallow footings. This will destabilise the listed terrace and rear retaining wall. The application clearly contradicts the policy of preserving listed buildings and should be refused.

**Policy A5 – Basements** : Policy A5 states clearly that *‘The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to [a] neighbouring properties; [b] the structural, ground or water conditions of the area; [c] the character of the amenity of the area; [d] the architectural character of the building; and [e] the significance of heritage assets’*.

This application conflicts all of the above 5 criteria i.e.

- a) **Harm to neighbouring properties**-The proposal will cause very real damage to both party wall neighbours 29 Willoughby Road and 33 Willoughby Road by way of deep excavations, underpinning and settlement imbalances. This will be further aggravated by changes to ground water flows and directions.
- b) **Harm to the structural, ground or water conditions of the area** - Given the instability of the soil profile make up, the topography and slope of the immediate environs of the site which includes Willoughby Road and Willow Road, the underground water flow directions, the lower trench and floor levels of Listed Willow Cottages including the immediate proximity of the underground subsidiary of the Fleet River relative to Willow Cottages, the proposal will cause serious damage and harm to the prevailing and existing structural, ground and water conditions of neighbours and heritage assets alike.
- c) **Harm to the character of the amenity of the area** - Given the constrained site of 31 Willoughby Road which has [a] its longer north boundary abutting most of the listed terrace Willow Cottages, and [b] its shorter west boundary facing the rear of Gayton Crescent, it is seen that the distance from the face of the existing ground floor rear extension to the existing protected tree in the rear garden is only some 7.5m. The full depth of the rear garden is only approximately 8.9m to the west boundary with the Gayton Crescent properties.

From submitted drawings there are deep excavations to a depth of 4.425m from Ground Floor FFL. These excavations and retaining wall construction leave only 5.4m from the new east lightwell retaining wall to the existing protected tree. The row of 6no.x nom 450mm diameter piles which are less than 750mm apart, is only approximately 1.8m from the face of the protected tree. These proximities to the protected tree which gives real amenity not only to the applicant but also to the immediate and close neighbours, will not survive. This same tree also gives protections to numerous indigenous birdlife and supports biodiversity. The loss of this protected tree will cause harm to the character and amenity of the area. See Photographs at the end of this document.

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Policy A5 item 'u' requires the proposed works '*not to prejudice the ability of the garden to support trees where they are part of the character of the area*'. Camden CPG Section 3 item 3.1. states '*Applicants should also be mindful of the need to preserve or enhance the garden area for trees, other vegetation, and to support biodiversity*'. The above described proximities of new works relative to the existing protected tree clearly undermine this policy i.e. the basement with light well construction plus the row of [6.no](#) x garden piles located in positions as indicated contradict this policy requirement.

- d) **Harm to the architectural character of the building**- The proposal [which aesthetically remains as the withdrawn scheme] shows a modern aesthetic of glazed panels and concertina doors that are not in keeping with the materials of the main house which is part of a rich conservation area. The new fenestration and layout also reinforce unacceptable direct overlooking towards 39-40-41 Willow Cottages. Such confused construction and mismatch with modern materials and profiles causes harm to the architectural character of the building, to neighbouring buildings and the conservation area.
- e) **Harm to the significance of heritage assets**- The planning application disregards the significance of the contiguous registered heritage assets known as Willow Cottages that includes the listed lower rear retaining wall. The very close proximities of the new construction to the registered heritage assets by way of the new excessively deep excavations, formation of safe shoring to allow construction of new RC retaining walls, the extreme vibrations from piling all will cause unacceptable levels of damage to these registered heritage assets. There is a duty of care to provide and guarantee safe protection of the contiguous listed heritage assets which the proposal does not give. See Figure Plan, showing Willow Cottages rear amenity and access plus Photographs inclusive at the rear of this document.

**Policy A5 – Basements and allowable single storey excavation depth:** Item 6.131 clearly states that '*the council considers a single storey for a basement to be approximately 3 to 4 metres in height*'. This is further clarified in CPG Basements document item 2.4 Table 1 item f which states '*The requirement for storey heights to be no more than 3-4m refers to the total depth of the excavation [the external dimensions]*'.

From drawings it is seen that the NGL at the rear extension is surveyed at level 85.500. The new basement SFL is shown as level 81.950. Scaling off drawing G1808-PA-104E1 Section AA, the new basement floor construction to excavated ground level is approximately 675mm. The excavation level is 81.275.

The external dimension is therefore 85.500 less 81.275 which equals a dimension of 4.225m. This excessive depth of 4.225m increases to 4.315m when scaling from the same drawing G1808-PA-104E1 Section AA that shows a higher Ground Level. Either way the excavation depth **exceeds** permissible depths of between 3-4 metres. The application therefore does not comply with policy.

**Policy A5 – Basements : Cumulative Impact of several adjacent underground developments:** Item 6.124 states '*the cumulative impact 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*'.

There are a number of new basement developments located within a short distance from 31 Willoughby Road. The addresses are as listed below i.e.

- a. 1 Kemplay Road NW3
- b. 5 Kemplay Road NW3
- c. 49 Denning Road NW3
- d. 51 Denning Road NW3

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- e. 2a Willoughby Road NW3
- f. 3 Trinity Close, Willoughby Road NW3
- g. 21 Willoughby Road NW3
- h. 34 Willoughby Road NW3
- i. 44 Willoughby Road NW3

Properties which have registered damage from subsidence or damp or flooding or a combination of these manifestations are

- j. 19 Willoughby Road where problems have been caused by the extensive investigative works for proposed basement excavation at no. 21 Willoughby Road
- k. 23 Willoughby Road where problems have been caused by the extensive investigative works for proposed basement excavation at no. 21 Willoughby Road
- l. 25 Willoughby Road where problems have been caused by the extensive investigative works for proposed basement excavation at no. 21 Willoughby Road
- m. 33 Willoughby Road have registered damaged drains and dangerous foul waste seepage on numerous occasions directly after the investigative works at the rear of 33 Willoughby Road
- n. 50 Willoughby Road have found problems of water seepage in their coal hole and basement patio possibly due to basement excavation work nearby.

The above list is not exhaustive and shows the scale of this type of construction in the immediate vicinity of the application. Basement works must not be considered in isolation as individual projects alone, but cumulatively as the unintended consequences of their combined impacts causing higher levels of damage through changes to underground water flows is accounted for and is not defined in mathematical modelling specific to individual submission BIA documents.

There have been a number of reports from local residents nearby of increased water penetration and excess flooding at 19, 23, 33, 35 and 50 Willoughby Road due to different basement constructions located nearby at 21 and 44 Willoughby Road. This confirms the need to include for cumulative impacts from basement constructions when decisions are made. This study does not include such crucial scrutiny and fails to consider the cumulative unintended consequences and impacts over time on the rich historic fabric of Hampstead – especially as the dominant Victorian residential terrace prototype all have basements which sit on and in the high silt top layers as identified in the HNP document item 5.5.

The lower fragile listed structures of Willow Cottages have shallow footings, are located in a sloping valley which has much underground water, has a high-water table, sits over a subsidiary of the Fleet River, are founded on complex layers of soil types which are susceptible to high water conductivity and silt erosion, and is also surrounded by high surface water run off due to the hard surfaces and steep slopes of the area. All of this has been pointed out in earlier objection documentation and *it* remains relevant to this application.

The cumulative impact from this basement proposal on the abutting registered heritage assets when viewed against the above context and when combined with the known impacts from the other basement developments in the immediate area, will clearly

- a. add unacceptable levels of more damage,
- b. generate more changes to ground water flow directions down the slope towards Willow Road and beyond resulting in more flooding to numerous lower properties which are predominantly part of dense Victorian terraces with lower ground floors / semi basements', and

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- c. cause even more damage due to soil bearing reduction through loss of fines to existing stable founding soils.

**Policy A5 – Basements: Demolition and construction and impact on amenity:** Item 6.125 states that *‘the demolition and construction phases can have an impact on amenity, and this is a particular issue for basements’*. Given the proposal’s extremely close proximity to 29 and 31 Willoughby Road and the rear long boundary of lower structures and spaces of abutting heritage assets Willow Cottages with the retaining wall which forms safe play and amenity space for children at 37 and 35 Willow Cottages and small patio and terrace spaces to 39-40-41 Willow Cottages, the demolition, shoring and construction works [e.g. piling] associated with the application will impact greatly in diminishing amenity of neighbouring properties – over and above the damage caused by the works themselves. See Photographs and Plan diagram at the rear of this document.

**Policy A5 – Basements: Basement Construction Plan:** Item 6.127 states that *‘to ensure that basement construction is undertaken without causing damage to neighbouring properties and the water environment the council may require the developer to provide a Basement Construction Plan in some instances’*. This application, through its history, repeat submissions, community disquiet and objections, is clearly contentious. The reasons for objections are multiple.

Given the unresolved and limited nature of any construction detail within the current application both generally and specifically, given the various identified ‘pinch points’ relative to contiguous heritage assets, and given the fact that the withdrawn application had similar shortcomings regarding detailed construction information, it would seem sensible that a Basement Construction Plan [BCP] should be forthcoming and included at this stage of the application. Such critical information would help to identify the true impact on listed Willow Cottages and the listed rear retaining wall that are protected under legislation.

Whilst it is recognised that the application process requires a ‘Basement Construction Plan’ [BCP] to be requested by Council and Camden’s consultants Campbell Reith at the next stage of audit if needed, the applicant should pre-empt this request due to having made this current application based on the same earlier withdrawn scheme that would have been refused. The Hampstead Neighbourhood Plan document reinforces this position in that the applicant should provide adequate, correct and detailed information based on true and correct data from bona fide expert consultants that *‘ensure that risks can be identified and damage mitigated at the planning stage’* [See HNP item 5.10]

**ELABORATION\_04 Hampstead Neighbourhood Plan 2018-2033 :** The application does not comply with the following policy guidelines as described and defined in the adopted Hampstead Neighbourhood Plan 2018-2033 i.e.

**NHP Policy DH2 ‘Conservation areas and Listed Buildings’ :** Paragraph 3.10 of Policy DH2 clearly states that *‘the effect of a planning application on a listed asset [designated heritage asset] or an asset noted as making a positive contribution in the relevant conservation Area Appraisals or are in Camden’s Local List [non designated heritage asset] should be taken into account’*.

Policy DH2 item 4 also states *‘Development proposals must seek to protect and / or enhance buildings [or other elements] which make a positive contribution to the Conservation area, as identified in the relevant Conservation Area Appraisals and Management Strategies’*.

DH2 Paragraph 3.12 states *‘harm to a designated or non-designated heritage asset would include development that through its height, mass, profile or quality, obstructs or degrades the asset or its setting’*

This application also contradicts policy DH2 Paragraph 3.12 [*Harm to designated or non-designated heritage asset*] and 3.18 [*...Contribute positively to the public realm*]. as the proposal offers extensive damage to neighbouring



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heritage assets and other immediate buildings that are within and part of the Conservation area. It is also out of character with the area in terms of scale, proposed materials, impact and overlooking.

The proposal is targeted to the sole benefit of the applicant alone and not to the public realm, not to designated heritage assets and not to the Conservation area.

**NHP Policy BA2 Section 5 Basements :** It should be noted that Section HNP Section 5 Basement paragraph 5.5 confirms the complex soil makeup and layering of Hampstead where the top two layers have high silt and sand components which are *'render them susceptible to high water conductivity and silt erosion, as well as being potentially less stable'*. Paragraphs 5.6 [potential landslip] and 5.7 [shallow foundations and lateral support] are equally important when placing the application in context relative to designated heritage assets of Willow Cottages.

Grade II Willow Cottages and the Grade II listed lower retaining wall are designated heritage assets. The application 2020/0927/P would cause unacceptable and excessive harm and damage to these abutting designated heritage assets from

- a. damage from the proposed construction methods and implementation,
- b. the vibration from the piling process,
- c. the cumulative effect of basement constructions adversely changing the underground water flow pattern which cause the removal of fine silts from the bearing soils and which in turn, will cause differential settlement and damage to the terrace by reducing structural support from each individual listed cottage within the terrace.

The proposal seeks neither to protect nor to enhance the contiguous heritage assets of Listed Willow Cottages which clearly make a contribution to the Conservation area and to the public domain at large. The proposal does not comply with these policies.

**NHP Policy DH1 item [d]:** Policy DH1 item [d] requires all planning application proposals within the area covered by the NHP policy to ensure that they are safeguarding and "protecting the amenity and privacy of neighbouring properties". The proposal contradicts this policy position as outlined in in Elaboration\_10 below.

**ELABORATION\_05 Overdevelopment:** The existing house is recognised under Camden criteria as being a 'large' dwelling. It comprises of 8 no. x 'habitable rooms' over four floors. There are 2no. x living rooms, a large kitchen with dining at ground floor; 4 large double bedrooms over First and Second floors, and a large study in converted attic on the fourth floor.

The house has been altered to give additional floor area through the conversion of the attic space. There is a large second floor terrace on the rear extension.

The proposed basement works are seeking another full floor to create a large kitchen-dining area with gym and utility, and to convert the existing large ground floor kitchen-dining room into a third living room.

There are two people living only occasionally at the premises.

The proposed works are not aimed at complying with Camden Local Plan policy HC1, items 3.140 and 3.141 which suggest that a design should include for 'future proofing' by way of accounting for changes in age profile needs and changing mobility needs. This proposal does not deal with any of these vital concerns. The proposal is overdevelopment.

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**ELABORATION\_06 BIA Document Anomalies:** It is understood that the BIA document as well as all other associated documents will be carefully audited in full by Camden's appointed expert, Campbell Reith. Campbell Reith have had sight of Willow Cottages earlier objections and concerns to which the Eldred Geotechnics BIA document [PROJECT G1808 Report Ref.G1808-RP-01-E2 dated February 2020] refers. Our comments and observations levelled at the new BIA document are based on common sense and logic, and point out some of the inconsistencies found in the new study.

**ANOMALY\_01:** The BIA states at the beginning that the new study is needed as to overcome the shortcomings of the earlier withdrawn study that was essentially inadequate in [a] understanding the immediate ground and groundwater conditions, or the scale of subsidence and damage to neighbouring properties in particular to Willow Cottages and the listed lower rear retaining wall, and [b] determine a suitable geotechnical engineering solution for justifying a basement construction to 31 Willoughby Road. This new study has gathered new investigative data, new analysis of combined new and old data or 'fact' and arrived at conclusions justifying the implementation of a site-specific basement.

The first problem with this is that the authors are incorrectly postulating that the only concerns forming the basis of our objections are solely to do with groundwater damage and subsidence. Of course, these are major concerns to Willow Cottage residents, as physical damage to these and any registered heritage assets are unacceptable at any level. To suggest that groundwater damage, subsidence and physical damage caused by the construction works are the only concerns is incorrect and false. Our full scope of objections is clearly set out in this document as we consider this proposal to be unacceptable in its entirety. It does not comply with numerous policies that safeguard the fabric forming this Conservation area and these registered heritage assets.

**ANOMALY\_02:** The new study has obtained additional ground water and soil data by carrying out the excavation of new trial pits and installing six transducers at different depths within new and existing boreholes over the 8 months period August 2018 to March 2019. Whilst this may be laudable, this period can not be considered correctly as being either representative or longitudinal. Such a period coupled with historical annual and monthly rainfall figures plus being weighted for climate change would seem to be far more correct for appropriate modelling purposes.

This is borne out by recorded Met Office rainfall figures - See attached rainfall data [Table\_01\_Recorded Rainfall Heathrow 1948 to 2020] which shows official rainfall figures recorded from January 1948 to March 2020.

- a. From these figures you will see that for the same 8 month period [August 2018 to March 2019] over the recorded 73 years, 52 years have HIGHER rainfall readings than those within the BIA designated period i.e. 72.2%!
- b. The Met Office recorded annual rainfall figures for 2018 and 2019 was 580mm and 561.7mm respectively. The table shows that for 40 of the 73 recorded years, the annual rainfall was an average of 1501.6mm.
- c. The 1501.6mm annual average is 259% higher rainfall for 55% [40 years] of the total recorded rainfall period of 73 years than the 2018-2019 BIA assessment period!

The BIA data is clearly not representative nor reflective of real rainwater conditions.

This 'under value' makes any and all ground water modelling and analysis incorrect and invalid. This 'under-valuing' hides the real potential damage to the bearing soils and the quantum of fines removal which causes physical damage due to differential settlement. All results and conclusions defining 'real potential damage' to the

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abutting heritage assets are therefore invalid and incorrect. The authors claim that the BIA data is determined on new data which is based on is 'fact'. This is false as the data used is neither representative nor statistically valid. Easily obtained recorded data from the met office has not been factored into the analysis.

This is all the more alarming if one considers that [1] the authors state that they are trying to resolve the matter of potential damage to the listed Willow Cottages structures as identified in the objections raised against the earlier withdrawn application, [2] that this is to be carried out through acquisition of new data that is based on 'fact' and not 'opinion', [3] that this proposal is in fact a second attempt [with the same earlier rejected scheme] to resolve quantifiable risk and damage to Willow Cottages. The facts that they cite are not evidence based.

It is also even more disturbing when there is already a long history of flooding and damage caused by various basement works up and down Willoughby Road that the new BIA has chosen not to account for e.g.

- a. Exploratory excavation work at no. 21 Willoughby Rd in 2006 in connection with a basement extension plan that was subsequently abandoned, led to significant and on-going problems of water seepage and damp for immediate neighbours at nos. 19, 23 and 25 Willoughby Road.
- b. Builders excavation for the new basement at no.44 Willoughby Rd, directly opposite no 31, encountered serious problems of flooding of the site. The owners of no 50 Willoughby Rd, a short distance down the slope from no.44 have found water seepage in their coal hole and basement patio.

One would have hoped that the applicant's experts would have formulated their new analysis based on correct and robust representative data that generate a higher threshold of safety for heritage assets and not substandard non-representative data which only makes the BIA Final Impact Assessment as per BIA page 6 null and void.

When one views Camden policy document 'Managing flood risk in Camden The London Borough of Camden flood risk management strategy' one sees that Willow Road within area 'Hampstead Town' [see *Table 6.1 Key locations at risk of flooding in Camden North* ] is identified as an area of high risk from surface flooding [ see extract '*6.3.2 Hampstead Town : This area covers a range of different locations to the west and south of Hampstead Heath. Enhanced modelling estimates large numbers of properties may be within the Very Significant and Significant risk bands. Flooding is generally caused by direct rainfall on impermeable surfaces generating relatively high surface runoff velocities over roads and water collecting at low points. Five different locations have been identified as having flood risk ....*' ].

This clearly contradicts the Eldred Geotechnics BIA document which states that there is no risk of flooding to either 33 Willoughby Road or the listed Willow Cottages. It should be remembered that Willow Cottages is set within a much lower trough at a lower level 'down stream' from the applicant, the cottages all sits on top of a subsidiary of the River Fleet and originally the site was for growing water intensive water cress.

The following extract should also be viewed as again the submitted BIA document does not address the real levels of possible flooding specific to the specific conditions underlying these listed cottages i.e. Extract - '*Finally DP27 – Basements and lightwells states that in determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.*'

Clearly the BIA fails to correctly address the real aspects of possible flooding and groundwater and the application should be rejected as it is proposing to cause very real and serious damage to these heritage assets.

## OBJECTIONS to Planning Application 2020/0927/P: 31 Willoughby Road NW3 1RT

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**ANOMALY \_03:** Eldreds involvement with the 39 Willow Road retaining wall was in 2013 when approved works to 39 Willow Road allowed for the removal of non-structural sheds to the rear. For the record it should be noted that neither Eldreds nor the owners of 31 Willoughby made any responsible input towards safe resolution.

The removal of the non-structural sheds had exposed the extreme damage that had been caused to the listed retaining wall due to the dangerous overloading placed on the lower fragile heritage structure by the owners of 31 Willoughby Road. The removal of the sheds did not cause the damage as Eldreds have incorrectly and falsely speculated, that belongs solely to 31 Willoughby Road. The owners of 39 Willow Road carried out precise in situ investigations which showed that the higher wall was unfounded and had pushed the lower wall out of plumb by over 250mm from the face of the higher wall [191mm from relative datum] making the combined area a high-risk danger to life and limb from collapse. See Photographs at the end of this document.

The owners of 31 Willoughby Road were again informed but refused to carry out needed safety repairs.

Due to the high danger risk from collapse the owners of 39 Willow road instigated further temporary safety works by way of installing an engineer approved steel frame to stop any further movement or collapse.

The false apportionment of damage to 39 Willow Road is also implied in associated Eldred Geotechnics drawing G1808-PA-001-E1 Section AA which spuriously claims that '*listed wall cracked, in poor condition and damaged additionally by removal of intersecting walls*'. Approved Listed and Planning Applications drawing 329/WR-00-602 clearly shows the surveyed profile in section and plan of the bowed and listing heritage retaining i.e. in the centre. The separate dividing walls were all removed in the 1950's, decades before the raised rear garden and wall of 31 Willoughby Road was built. This is not opinion but fact. The Eldred position is conjecture and speculation which has no place in the BIA document which they purport to be based solely on fact.

**ANOMALY \_04:** As the proposal is a resubmission of the 2018 withdrawn scheme where a number of objections were tabled against the proposal, and that the 'new' application [as shown in this document] has done little to deal with the various earlier tabled 2018 objections [not only in terms of physical damage from groundwater disruption, subsidence, chosen construction methods of excavation and piling, but also in terms of current planning policies as identified in Camden Local Plan and in adopted Hampstead Neighbourhood Plan], it seems inconceivable that the new BIA document does not fully include for additional steps needing to be identified in the HNP policy document 5.12 items [a]-[i] inclusive.

Also given that this is essentially a repeat application, then the BIA should include a detailed 'Basement Construction Plan' [BCP]. This would allow the applicant to show clearly and precisely how the proposed construction works, its sequencing, its tasks like safe excavations, ground water control, safe shoring, actual piling and works about identified critical areas and 'crunch points' relative to the contiguous heritage structures are to be carried out whilst protecting them from physical damage that clearly deep excavations and piling will cause due to their very close proximities to either identified critical 'crunch points' of garden piles.

The rear of the site is small, confined and without direct access. There is no description of how each of the construction tasks are to be carried out e.g. safe protections, safe support and shoring of abutting heritage assets without damage, installing piling rig and piling equipment, process and sequence of safe excavations, containment of groundwater during sequential excavations, safe containment of ground force energy dissipation from piling vibration so that there is no damage to the different heritage Asset structures, the safe protection of existing drainage runs to the rear of Willow Cottages as well as 33 Willoughby Road [noting that 33 Willoughby Road have had numerous leaks and seepage to foul water drains caused by earlier vibrations from 31 Willoughby Road site investigative works].



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The BIA merely suggests the method of construction [e.g. piling] but does not offer any precise clarification nor detail for protection of the contiguous heritage assets. This document identifies many serious shortcomings in the data used within the documents. Here Eldred Geotechnics merely pass this responsibility to the next phase of the planning audit and assessment process. No decision on this project should be made without a full and proper audit of this necessary and required detailed information.

**ELABORATION\_07 Incomplete and Incorrect Drawings** It is seen that both Eldred Geotechnics and Ungar Architects drawings are incomplete and incorrect in not showing the existing junctions of abutting heritage structures as they exist in situ. This, when coupled with the above BIA listed anomalies, incorrectly suggests that both the false narrative and the false conclusions are 'fact'.

The following examples highlight the above i.e.

Ungar Architects Drawings are the same scheme as submitted in 2016 and withdrawn in 2018. They are dated 2014. The drawings have not been updated and do not resolve any of the shortcomings which were raised in 2016 -2018 objections. None of the drawings show any comprehensive detail informing the proposal's very close proximity and relationship with Willow Cottages e.g.

- a. Drawings 109\_PLA\_SP Proposed Site Floor Plan shows minimal information relative to the contiguous heritage structures of Willow Cottages which is out of date and not reflective of the current layout [e.g. Rear enclosed patio of 39 Willow Cottages, Rear bay Window of 34 Willow Road, relationship of rear alley to Willoughby road is not shown]. There are also no dimensions to help clarify the numerous close proximities to Willow Cottages.
- b. Drawing 109\_PLA\_BFP proposed Basement Floor Plan shows limited information relative to the contiguous heritage structures. The dotted line of the listed retaining wall is incorrect, especially about 39 Willow Road.
- c. Drawings 109\_PLA\_GFP Proposed Ground Plan again shows limited information relative to the contiguous heritage structures of Willow Cottages. The listed retaining wall is incorrect, especially about 39 Willow Road. It is also wrong in regard to the existing rear patio and amenity space of 39 Willow Cottages. The plan also omits any reference to the layout and terrace of 40 and 41 Willow Cottages. The single line reflecting the part rear wall of listed Willow Cottages is devoid of detail like doors and windows which contextualise the relationships between habitable rooms and the proposal.
- d. Drawings 109\_PLA\_FFP Proposed First Floor Plan shows no information relative to the contiguous heritage structures of Willow Cottages. None of the close and abutting relationships of neighbouring listed retaining wall, the rear external wall with habitable room bedroom windows are shown. The rear terraces of 40 and 41 are also omitted.
- e. Drawing 109\_PLA\_ELE\_S Proposed Side Elevation shows no information about the lower retaining wall in elevation nor the lower rear amenity space of Willow Cottages.
- f. Drawing 109\_PLA\_ELE\_R Proposed Rear Elevation shows only diagrammatic information in section relative to Willow Cottages. Again, there are no levels nor key critical dimensions, nor actual boundary position nor correct listed retaining wall profile.
- g. Drawing 109\_PLA\_SEC\_CC Proposed Section CC offers no key dimensions clarifying the close proximity relationship between the proposal and the rear of Willow Cottages. The rear wall of Willow Cottages has a number of windows which need to be shown and considered. This section also registers the proposed basement function as Reception. This basement level function contradicts planning policy.
- h. Drawing 109\_PLA\_SEC\_BB Proposed Section BB offers no key dimensions, no levels and no information about either 29 or 31 Willoughby road. This drawing is merely diagrammatic and incomplete. It also registers the proposed basement function as Reception. This basement level function contradicts planning policy.

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Eldred Geotechnics Drawings show the following inconsistencies e.g.

- a. Drawing G1808-PA-001-E1 Existing Site Plan and Sections shows the existing rear configuration to the rear amenity space of Willow Cottages to be incorrect, especially relative to 39 Willow Road enclosed rear patio. Section A-A is incorrect in profile, in content, in materials and in suggestion to cause of damage. The plan also offers no key dimensions relative to contiguous heritage assets.
- b. Drawing G1808-PA-101-E1 shows a blow up of the rear garden with proposed piling plus basement retaining walls relative to 38-40 Willow Cottages. Again, the plan configuration of Willow Cottages is incorrect. Again, there are no key dimensions in either plan or section identifying real distances between back face of new retaining walls and back face of listed retaining walls, between new piles and rear face of listed retaining wall. There are no levels clarifying SSL nor full excavation levels; there is no information nor dimensions clarifying construction makeup of new concrete floors and retaining walls; and Section AA is incorrect in profile, in content, in materials and in suggestion to the cause of damage. The plan also offers no key dimensions relative to contiguous heritage assets.
- c. Drawing G1808-PA-102-E1 shows no SSL nor new excavation NGL level specific to the proposed basement works. Section AA offers no levels nor dimensions clarifying construction make up.
- d. Drawing G1808-PA-104-E1 shows no new excavation NGL level specific to the proposed basement works. It also does not clarify size and depth of piles; it shows no information and comment as to how the retaining wall structure is to be shored and formed.

Both Eldred Geotechnics and Ungar Architects drawings are seen to show numerous omissions in key information. The submission of such drawings that are [1] without correct abutting site conditions and layouts, or with actual wrong abutting site conditions; [2] devoid of any clear critical dimensions showing real proximities of new construction elements and new excavation zones to abutting Heritage Assets; and [3] misrepresenting Willow Cottages in planning and engineering terms undermines the premise that the 'new BIA' is drawn from fact – especially as the scheme drawings are from previously withdrawn application.

The BIA documentation with such drawings are without critical dimensions and do not address the full aspect of construction implementation and sequencing.

**ELABORATION\_08 Disruption, Noise and Disturbance:** Due to proximity and site configuration, the proposed works will cause months of excessive noise, dust and disruption not just to Willow Cottages but also to abutting and surrounding neighbours. Most occupants in Willow Cottages are predominantly home-based workers. The noise, dust and vibration from excavations, shoring, piling and other close proximity tasks will severely impact on residents' livelihoods due to the very real close proximity of 31 Willoughby Road basement works to the listed Willow Cottages.

It will also cause dangerous traffic conditions from high levels of large haulage trucks moving to and from site – noting that Willow Road is frequented by a number of school children going to and from schools in the area.

**ELABORATION\_09 Works Sequence :** The rear of the site is small, confined and without direct access. There is no description of how each of the construction tasks will be carried out e.g. safe protections, safe support and shoring of contiguous heritage assets and structures without damage, installing piling rig and piling equipment, process and sequence of safe excavations, containment of groundwater during sequential excavations, safe containment of ground force energy dissipation from piling vibration so that there is no damage to the different heritage asset structures, the safe protection of existing drainage runs to the rear of Willow Cottages as well as 33 Willoughby Road, and safe support to 29/33 Willoughby Road properties specific to underpinning works.

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It is seen that the investigative works carried out by the applicant over the now many months has caused damage to below ground drainage runs to 33 Willoughby Road. There have been a number of leaks and seepage from foul water drains caused by earlier vibrations from 31 Willoughby Road site investigative works. Such damage is clearly unacceptable but is indicative of ill-conceived implementation.

Protecting the registered heritage assets is paramount. All of the construction tasks and sequencing specific to the works need to be fully identified, assessed and analysed. They should be fully scoped at this stage of the application and not left till the next stage. This is vital - especially as the application is merely a re-submission of the 2016 scheme which was withdrawn under threat of refusal.

Remember that the impact of this basement proposal when viewed against the sloping topography and lower valley formation of Willow Road coupled with existing underground water subsidiaries of the Fleet and existing lower ground level of Listed Willow Cottages, when combined with the known impacts from the other basement developments in the immediate area, will:

- d. add additional and unacceptable levels of more damage to both heritage assets and conservation area buildings,
- e. generate more changes to ground water flow directions culminating in more flooding to numerous lower properties which are predominantly in the main part of dense Victorian terraces with lower ground floors / semi basements and
- f. more damage due to soil bearing reduction by way of fines removal.

**ELABORATION\_10 Overlooking, Loss of Privacy and Loss of Amenity** : As stated in our objections to the earlier withdrawn scheme, this resubmission causes the same loss of privacy and loss of amenity to parts of Willow Cottages. The rear ground floor has a new living room. This is a 'habitable room' which will allow for views into the living rooms of 39 and 40 Willow Road [approx. 7.2m sight line distance]. See Photographs at the rear of this document.

It also allows for direct overlooking to the rear terrace amenity spaces of 40 and 41 Willow Road as well as the lower amenity spaces of 37-38 Willow Road and the enclosed lower patio of 39 Willow Road. This loss of privacy and of amenity usage is unacceptable and contradicts planning policy Camden Local Plan Policy A5 item [q] and Hampstead Neighbourhood Plan Policy DH1 item [d] which relates to 'protecting the amenity and privacy of neighbouring properties'. This proposal undermines the integrity of the existing heritage assets which should be suitably protected by law. It also, by loss of the existing tree, causes a loss of privacy and amenity to those Gayton Crescent residences directly opposite by way of overlooking from the new proposed habitable room [reception] into Gayton Crescent bedrooms and living rooms.

END

Version 24042020

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Rainfall data- Source metoffice .gov.uk https://www.metoffice.gov.uk/ Rainfall Units in mm																				
	YEAR	Jan	Feb	Mar	Apr	May	Jun	Jly	Aug	Sep	Oct	Nov	Dec	Annual total	Average					
1	1948		85	26	14		35	57		67	21		67	35	50	44	63	564	47.00	
2	1949		23	27	26.1		34.2	56.9		9	46.5	26.3	23.3	139.6	53.4	33		498.3	41.53	
3	1950		16.8		82.2	17.4	54.8	41.8		44.6	91.8	68.8	63.3	10.9	108.2	40.2		640.8	53.40	
4	1951		71.3		121.4		86	60.6		53	26.9	33.8	95.5	66.3	23.5	132.6	36.9		807.8	67.32
5	1952		47		16.1		65.3	39.9		57.1	30	12.2	63.5	70.8	69.8	79.4	66		617.1	51.43
6	1953		21.2		31.4		8.5	53.7		32.4	34.8	75.3	39	47.4	65.7	28.6	13.3		451.3	37.61
7	1954		23.5		51.5		51.3	8.9		52.6	95.3	62.1	87.5	58.1	54.1	95.5	46.6		687	57.25
8	1955		50.2		35		22.8			103.2	52.1	7.1	17.8	42.7	87.7	30.1	46.7		495.4	45.04
9	1956		88.6		2.3		15	29.1		4.2	41.5	130.5	99.5	50	74.1	10.1	70.3		615.2	51.27
10	1957		39.5		69.8		25.4	5.7		21.3	22.4	87	86.2	51.7	47	59.5	42.1		557.6	46.47
11	1958		64.3		58.7		26	29.5		59.5	104.3	51.9	75.2	83.8	50.7	50.7	85.1		739.7	61.64
12	1959		54.8		2.4		43.8	52.9		21.9	16.2	86.5	27.6	5.1	46.9	53.5	75.7		487.3	40.61
13	1960		54.8		2.4		43.8	52.9		21.9	16.2	86.5	27.6	5.1	46.9	53.5			411.6	37.42
14	1961		64.4		55.1		5.7	50.8		17.2	29.2	26.2	47.6	64.7	56.8	52.5	88.6		558.8	46.57
15	1962		76.1		12.6		35.8	41.8		29.6	6.1	82.8	52.9	88.4	37.6	41.7	52.8		558.2	46.52
16	1963		38.4		72.2		95.9	123.2		195.6	193.4	196.2	138.6	120.9	85.4	59.3	44.1		1363.2	113.60
17	1964		37.4		59.2		66.8	126.1		197.8	164.1	219.7	215.7	213.7	126.2	55	48.6		1530.3	127.53
18	1965		72.8		32.5		129.7	138.6		194.6	184.7	129.9	184.7	130	129.1	96.5	54		1477.1	123.09
19	1966		40.8		27		122.6	88.7		222.9	205.4	161.6	199.7	161.4	81.3	59.3	36.3		1407	117.25
20	1967		66.1		89.5		172.9	138.2		183.6	210	239.5	182.9	118.6	99.1	78.7	61.3		1640.4	136.70
21	1968		43		67.2		142.3	188.4		170.8	172.5	146.7	121.1	125.6	78.5	40.7	30.7		1327.5	110.63
22	1969		32.4		70.5		66.8	207.6		149.1	262.8	229.2	141.3	118.5	117.3	71.1	18.5		1485.1	123.76
23	1970		31.9		105.5		99.7	122.7		219.2	273.3	181.3	184.3	157	100.9	59.8	45.3		1580.9	131.74
24	1971		42.5		72.6		104.7	121.5		232.9	145.4	224.1	147.5	173.9	147	96.3	31.4		1539.8	128.32
25	1972		40.9		35		144.5	120.8		171.7	166.3	151.4	190	117.5	112.7	78	56.5		1385.3	115.44
26	1973		28		66		138.1	140.5		167.2	254.5	173.7	189.1	180.4	98.9	87	59.6		1583	131.92
27	1974		46		67.2		101.3	159.3		196.4	201.7	187.7	190.3	156	89.1	42.7	52.6		1490.3	124.19
28	1975		38		79.1		66.9	133.4		149.8	293.7	217.3	226	144.1	111.6	78.8	40.3		1579	131.58
29	1976		68.3		39.7		127.1	182.3		209.2	261.2	263.5	263.7	118.9	61.4	60.1	57.4		1712.8	142.73
30	1977		38.2		83.3		105.1	151.1		210.5	134.8	210.4	135.8	117.5	113.8	88.4	37.1		1426	118.83
31	1978		47.4		41.3		108.5	113.8		210.6	175.9	142	177.6	166.7	98.4	81.7	35.4		1399.3	116.61
32	1979		58.5		52.9		99.6	106.3		200.6	140.3	182.5	171.3	177.6	124.9	58.1	49.6		1422.2	118.52
33	1980		72.4		52.2		83.2	161.2		221.1	188.8	163.7	173.4	146.6	123.3	66.4	63.7		1516	126.33
34	1981		62		71.6		56.8	129.9		112	152.1	148.9	217.9	151.1	110.3	54.9	47		1314.5	109.54
35	1982		57.7		51.3		171.3	180.9		204.8	182.1	164	168.9	156	69.6	55.5	50		1512.1	126.01
36	1983		51.4		85.3		93.4	145.4		136.8	188.8	247.8	219.1	113.7	114	42.9	58.5		1497.1	124.76
37	1984		88.1		71.6		51.4	230.5		144.7	237	232.5	201.1	98.1	91.2	75.4	49.3		1570.9	130.91
38	1985		46.9		78.3		105.2	157.5		163.7	167.2	241.4	187.3	143.4	118.8	88.6	39		1537.3	128.11
39	1986		105.6		14.5		43.5	60.7		52.3	17.2	54.6	66.7	22.8	72.4	66.1	60.6		637	53.08
40	1987		11.1		32.4		42.7	39.9		54.1	69.9	77.3	57.2	36.9	174.8	43.3	14.4		654	54.50
41	1988		54.7		115.9		88.1	145.8		202	159.9	161.7	195	147.8	110	89.2	37.5		1507.6	125.63
42	1989		59.2		94.2		100	144.5		310.1	258.5	274.8	267.1	131.2	113.4	107	33.6		1893.6	157.80
43	1990		57.6		94.3		154.6	245		287	132.5	273.2	249.3	173.4	122.5	70	47.8		1907.2	158.93
44	1991		68.4		48.5		102.7	158.5		138.7	135	218.6	241.7	183	87.1	59.2	60.7		1502.1	125.18
45	1992		56		50.3		61.8	129.7		271.9	213.7	158.6	149.2	127.5	112.6	61.6	49.1		1442	120.17
46	1993		37.8		51		128.4	126.9		176.6	224.2	174.6	219.4	104.5	117	71.3	52.4		1484.1	123.68
47	1994		73.4		72		126.4	175		158.3	265	267.1	180.9	109.7	141	42.7	60.8		1672.3	139.36
48	1995		59.6		70.9		194.5	199.5		234.4	187.7	247.1	295.3	142.4	129.9	76.2	44.7		1882.2	156.85
49	1996		25.3		100.3		75.9	147.5		182.6	282.7	233.7	217.6	142	142.3	107.5	57.6		1715	142.92
50	1997		59.3		58.1		151	218.5		259.2	151.6	241.1	194.2	190.3	166	67.3	48		1804.6	150.38
51	1998		65.2		113.1		84.9	115.4		228.2	158.4	184.3	262.6	149.1	96.7	78.5	42.4		1578.8	131.57
52	1999		53.7		90.1		122.5	167.8		184.9	239.1	275.9	199.8	165	160.5	79	75.3		1813.6	151.13
53	2000		78.6		102.5		120.4	135.8		202.9	169.5	174.7	211.4	132.1	98	74.9	50		1550.8	129.23
54	2001		87		92.3		78.2	138.5		228	248	229.1	210.9	143.3	109.9	88.3	93.3		1746.8	145.57
55	2002		53.4		91.4		111.3	220.5		192.2	191.5	193.9	190.4	178.2	109.2	66.1	34.1		1632.2	136.02
56	2003		93.6		101.2		176.9	198		205.5	245.5	213.9	255.3	206.7	160.7	88.2	58		2003.5	166.96
57	2004		64		65.3		102.7	155		208.2	236	201.5	213.3	182.7	101.2	60.8	48.2		1638.9	136.58
58	2005		21.6		19.7		43.6	30		19.8	32.6	45.8	42.4	47.5	73.4	29.2	44.4		450	37.50
59	2006		16.8		41.2		44.6	33.4		91.6	11.8	23.6	68.8	78.2	64.4	98	63.6		636	53.00
60	2007		56		92.9		43.8	3.6		80	63.8	115.2	41	17.4	37.8	84.8	44.6		680.9	56.74
61	2008		69		15.4		69.8	63.4		64.2	45.6	76.8	64.4	43	45	58.8	41.2		656.6	54.72
62	2009		72.4		69.6		30	28		29.8	34	71.4	39.6	36	39.4	148	84.6		682.8	56.90
63	2010		51.8		100.4		39.8	23.2		20.6	12.4	18	88.6	38.2	74.8	32.2	21.4		521.4	43.45
64	2011		76.8		42.8		14.6	2.4		24.6	84	49.8	68.8	35	18.4	29	63		509.2	42.43
65	2012		34.4		16.8		16.2	98.4		25.4	110.8	71.8	36.4	41.2	88.4	71.8	95.8		707.4	58.95
66	2013		50.1		32.8		52.8	34</												

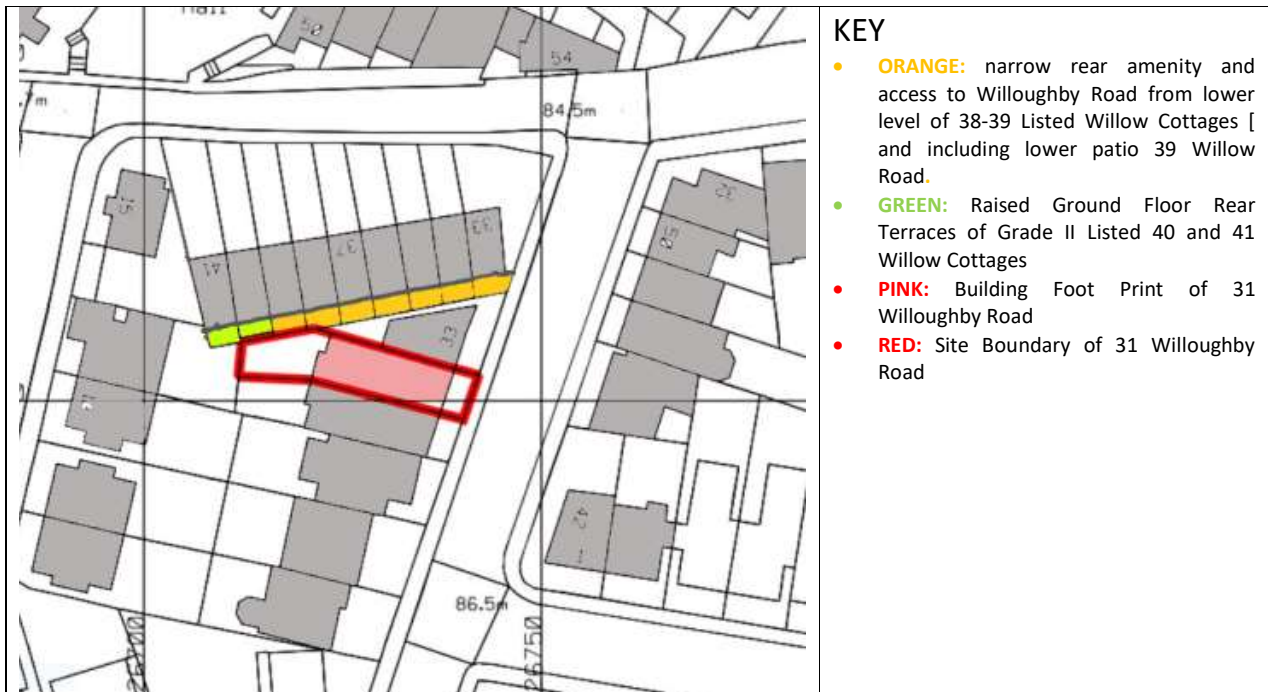
FIGURE: Table\_01\_ Recorded Rainfall Heathrow 1948 to 2020 [Source Met Office]



## OBJECTIONS to Planning Application 2020/0927/P: 31 Willoughby Road NW3 1RT

FAO Planning Officer Thomas Sild [email [thomas.sild@camden.gov.uk](mailto:thomas.sild@camden.gov.uk)]

**FIGURE:** PLAN / DIAGRAM showing the rear of Grade II Listed Willow Cottages with existing narrow rear amenity and access to Willoughby Road. The plan also shows the close proximity of abutting property 31 Willoughby Road where proposed basement with deep excavations and rear garden piling are proposed under Planning Application 2020/0927/P



**PHOTOGRAPH 01:** View showing close abutting relationship of Rear 31 Willoughby Road with Rear Access and Amenity spaces of Registered Heritage Assets Grade II Listed Willow Cottages and lower rear boundary retaining wall looking east



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PHOTOGRAPH 02: View showing close abutting relationship of Rear 31 Willoughby Road with Rear Access and Amenity spaces of Registered Heritage Assets Grade II Listed Willow Cottages and lower rear boundary retaining wall [looking west]



PHOTOGRAPH 03: View showing temporary steel support to damaged lower listed retaining wall as caused by additional loading from raised garden of 31 Willoughby Road.



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PHOTOGRAPH 04: View showing close abutting relationship of Rear 31 Willoughby Road with Rear Access and Amenity spaces of Registered Heritage Assets Grade II Listed Willow Cottages and lower rear boundary retaining wall [looking east towards Willoughby Road]



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PHOTOGRAPH 02: View from private terrace of 41 Willow Cottages showing the close relationship to Rear 31 Willoughby Road and showing the important existing tree.



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### *Existing Tree that gives amenity value and visual privacy to Willow Cottages and Gayton Crescent*



PHOTOGRAPH 03: View showing the direct view line into habitable rooms of 41 Willow Road from 33 Willoughby Road new proposed rear ground floor reception. This direct sight line into habitable rooms also applies to neighbouring grade II listed 40, 39 and 38 Willow Cottages. This view also shows the existing tree and its importance in providing amenity and privacy.