

I object to the planning application PA2020/0927/P - 31 Willoughby Road NW3 1RT on the following grounds:

- 1- Eldred's assumptions in their February 2020 submitted BIA document are factually incorrect and therefore, their conclusion is misleading. Specifically paragraph 52 describes an inspection of the lower listed wall at 39 Willow Road recounting an erroneous detail of the meeting over 6 years ago. I was present at this meeting as the owner of 39 Willow Road. I also have numerous emails subsequent to this meeting that clearly set out the cause for the destruction of our lower retaining wall. It is a fantasy to suggest that the sheds supported this lower wall. This is incorrect. The sheds had merely masked the movement and destruction of the lower wall. It is well known that the *listed* back wall of Willow Cottages has no foundation apart from a stone flag and that the raised garden wall of 31 Willoughby Road was incorrectly built on top of and abutting the lower wall of Willow Cottages. This erroneous assumption is then compounded by the unrealistic suggestion that inserting six, 450 mm diameter pilings only 750mm apart and merely one meter from the collapsing wall of Willow Cottages provides a means to support the wall. This is an academic fiction that defies logic and construction credence. The vibrations and displacement from the insertion of these pilings will generate unacceptable levels of risk and damage to the listed wall and significant potential damage to the fabric of the cottages. The damage will not be limited to 39 Willow Cottage but also specifically to cottages 41-38. Additionally, all the cottages will be adversely affected. As Eldred's recognise, these cottages were constructed as one single entity. This is also over and above damage to the vital existing tree, which gives visual amenity, and privacy to a number of properties that overlook this area due to the peculiar site configuration of surrounding properties.
- 2- The plan provides for excessive over-development. Addition of several entertainment rooms and sporting facility for a single/or at most two dwellers is unwarranted.
- 3- The necessary movement of soil is a real hazard to the existing residents and the local community. Numerous young school children and their parents use both Willow Road and Willoughby on a daily basis.
- 4- The risk if flooding is a real cause for concern. The engineer's rainfall data is statistically invalid. The monitoring period is too short and not representative of historically available rainfall data. Based on Met Office data, rainfall in London has been substantially (+70%) greater than the 2019/2020 monitoring data of Eldred's. As these experts have relied on desk research they should include statistically valid data and provide for confidence limits around their resulting conclusions. Camden's own document, Managing Flood Risk in Camden- The London Borough of Camden Flood Risk Management Strategy, highlights Hampstead Town as an area with risk of flooding (6.3.2). ('This area covers a range of different locations to the west and south of Hampstead Heath [including Willow Road and Pond Street]. 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.') This makes the BIA claim that the site is not at risk of surface flooding incorrect.

- 5- The movement of fines as a result of the necessary excavation and ground water flow pattern changes will further exacerbate the risk of flooding and damage to the listed cottages and nearby buildings.
- 6- The engineer's basement impact statement begins by claiming that they have based their conclusions on fact. The above highlight that their assumed facts are not real and invalid. They have also stated that there is much unknown and therefore any and all conclusions based on 'unknowns' are a fallacy.
- 7- The application contradicts various aspects of the Hampstead Neighbourhood Plan Policies. For instance DH2_3.10, DH2_3.12, DH2_3.18, BA Section 5_5.5.
- 8- The application contradicts various aspects of the Camden Local Plan. For instance policies D2_7.41, D2_6.143, A5_a to e, A5_6.131, A5_6.124, A5_6.125, A5_6.127.
- 9- This application implies an unaccepted level of risk for the whole row of the listed Willow Cottages. These cottages are designated as a national heritage asset that must be protected. The risk of damage inherent in this application is very real, significant and unwarranted. The works directly abut five of the nine listed cottages over and above the listed retaining wall. These five will be damaged. It is also known that the cottages are fragile structures with weak materials and are structurally interlinked. The damage caused directly to the abutting five will also cause damage to the whole listed terrace, a designated heritage asset, which Camden are duty bound to protect.