

Application No:	Consultees Name:	Received:	Comment:	Response:
2020/2028/P	John Saynor	29/06/2020 17:17:21	OBJ	<p>1. I very much regret that this is yet another application for a basement conversion in our lovely street. For the reasons given below, I urge Camden to reject this application. I strongly urge Camden not to treat previous similar applications as valid precedents.</p> <p>2. This description provided for this application is incorrect and misleading: "Erection of a single storey side infill extension at rear lower ground floor level, new lightwell to the front elevation to form habitable rooms....." It is in fact a basement conversion and should properly be described as such. This is important because it brings the application within the scope of Camden's Planning Guidance referenced below.</p> <p>3. The application does not reference "Camden Planning Guidance – Basements", dated March 2018, and there is little evidence that it has been consulted or followed. Reference: https://www.camden.gov.uk/documents/20142/4833316/CPG+Basement+March+2018.pdf/96dc1359-b771-1294-868b-8ef2bab5286a This states (at 1.17): "Basement development must not cause harm to: - neighbouring properties; - the structural, ground, or water conditions of the area; - the character and amenity of the area; and - the architectural character and heritage significance of the building and area. • The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. • Basement development must be no more than one storey deep and must not exceed 50% of the garden of the property."</p> <p>This proposal fails to meet these criteria as: - It does not consider the impact of the construction work on the upper flat (see below) - The loss of the front garden will have an adverse effect on the character and amenity of the street (see below) - The light well will occupy more than 50% of the present front garden of the property.</p> <p>4. The application is deficient in that it provides no Design and Access Statement, as specified at 5.10 of the Planning Guidance, and it fails to describe the impact of the development on the streetscape and its surroundings.</p> <p>5. Kylemore Road is an attractive small tree-lined street, and each house has a small front garden. The overall impression is of greenery. No 28 is no exception. Its front garden is small, but then we are in London, and a small garden can make a huge impact, as illustrated by other houses in the street. The existing garden comprises a flower bed on two sides (currently neglected) around a paved patio. This garden – erroneously described in the application as "hard standing" – would be lost and replaced by the light well and a concrete apron. This will have a negative effect on the overall streetscape. If every house in the street was developed in the same way, the street would lose much of its green character.</p> <p>6. The proposed lightwell is unnecessarily large and should be reduced in size to reduce its impact on the</p>

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garden. Even with the currently-proposed size of lightwell, the proposed basement room would still require artificial lighting when occupied, and so a shallower lightwell would make minimal difference to the lighting in the basement. The application does not address 2.16 of the Planning Guidance:

"In plots where the front garden is quite shallow, a lightwell is likely to consume much, or all, of the garden area. This is likely to be unacceptable in streets where lightwells are not part of the established character and where the front gardens have an important role in the local townscape."

7. Most of the houses in the street have been subdivided into flats at some point in their history, like no 28 which is the subject of this application. I mention this because conversions have been carried out at different times over the past century, and the state of a property often only becomes apparent when work starts. The application notes that the upper floors have not been surveyed, which means that assumptions made in the application may well prove invalid in practice. This failure to survey is likely to undermine many of the assumptions made in the application.

8. The application appears to assume that the upper flat will be unaffected by the work, which I believe is incorrect. It makes not reference to the huge impact that the work would have on the occupants of this flat. The house, like my own, is narrow – roughly 5m wide, of which the entrance passageway to the upper flat is about 1m wide. This passageway would constitute the only access in and out of the building, and it is hard to see how this could be maintained during construction of a very large hole beneath it. It seems to be assumed that the residents of that flat will continue to occupy it during and after the construction period. In this respect, it is unusual, as such applications normally involve a project that embraces the whole building, and it means that the upstairs residents will be greatly affected by the proposed work.

9. I am very much aware of the constraints of planning law which do not always allow neighbours to object on the basis of the huge disruption to adjoining properties over a period of years that result from basement conversions. Nonetheless, it is the case that the likely disruption is huge and the risks to neighbouring properties substantial. The Planning Guidance explains that "...basement developments also require more extensive excavation

resulting in longer construction periods, and greater numbers of vehicle movements to remove spoil. These extended construction impacts can have a significant impact on adjoining neighbours through disturbance through noise, vibration, dust, and traffic, and parking issues." For example, my elderly next-door neighbours suffered greatly from a two year basement conversion at no 23 Kylemore Road.

10. The timescales for the project, given in the "Provisional Program for Construction Works" can only be described as laughable. This programme allocates a mere three months for the underpinning and construction of a lightwell. My experience of observing very similar projects in the street is that 6 to 12 months have been spent extracting clay and underpinning. The task is made difficult by the wet conditions and the very constrained working area at the front of these houses. An example is the work currently underway at no 13 Kylemore Road – which has the benefit of being unoccupied. Realistically, the six month timescale proposed is quite unrealistic – I would suggest two years as the likely construction period.

11. The application notes that trial holes have been dug and that water was not found. This appears to be incorrect. I can confirm that the clay is wet just below the ground floor of my house in winter, as evidenced by digging of a test hole in my garden. Nearby Kilburn Grange Park can be observed in winter when it is

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				<p>waterlogged, often with standing water. I believe that the water table rises in winter and falls considerably in summer. If the test hole was dug during a dry spell, no water would have been found. What I have observed is that enormous quantities of wet clay have been excavated from other basement projects, and I have no reason to doubt that this will be any different. Therefore, I believe that the BIA Assessment (P8) is unsafe. This states:</p> <p>"1b) Will the proposed basement extend beneath the water table surface? No Boreholes drilled at the site did not encounter groundwater</p> <p>11. I would ask that the Council requests a S.106 or similar agreement in respect of this development, as I understand has happened in the case of similar developments in the area.</p>
