

Application No:	Consultees Name:	Received:	Comment:	Response:
2021/5916/P	Philip Kemp	04/02/2022 13:09:30	OBJ	<p>Scanning this application, I was surprised to read that "The site is classified as Zone 1, low probability - Land having a less than 1 in 1,000 annual probability of river or sea flooding. Very low risk - each year this area has a chance of flooding of less than 0.1%. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding."</p> <p>At least twice in living memory, in 1975 and again in 2002, Jeffreys Street has been seriously affected by flooding, with every house in the street suffering greater or lesser degrees of damage. Old maps, drawn up prior to the construction of the street in the early 19th century, show a complex of small streams flowing into the Fleet River that run under the whole area of the street. Any excavation of an additional basement area increases the chance of the house concerned, and adjacent houses, being subject to flooding. On these grounds I would oppose the proposed development at No 27.</p>

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2021/5916/P	Bevis and Susanna Sale	06/02/2022 19:08:45	OBJ	<p>Re: Planning application 2021/5916/P: 27 Jeffreys Street, London, NW1</p> <p>We object to this application for the following reasons:</p> <ol style="list-style-type: none"> <p>1. Definition of basement and lack of consultation:</p> <p>CPG Basements 2021, point 2.4, Lower ground floors, page 12, indicates how this application fails to meet the definition of a lower ground floor extension despite being presented as such. The basement status of the application is also tacitly acknowledged by the submission of a Basement Impact Assessment. Consultation with neighbours is required by Preliminary Stage 1.19, CPG Basements 2021. Despite this, prior to the submission of this application, there has been no 'consultation with adjacent infrastructure/asset owners' as set out in the applicant's BIA 1.1.4. We have had no opportunity to ask questions or seek clarification on anything prior to the submission of this application.</p> <p>2. Use of the term 'garden walls':</p> <p>CPG Basements 2021, point 4.8, states that 'All basement proposals should be subjected to the screening stage of a BIA to identify the matters relevant to assessment of local flooding and/or neighbour amenity and structural risks.' With regard to structural risks, the BIA repeatedly refers to the 'garden walls' of the neighbouring properties. The 'garden wall' referred to between 25 and 27 is in fact the rear wall of 25's brick built outbuildings. These outbuildings are approximately 120 years old with very shallow foundations, and are listed as part of 25's curtilage</p> <p>3. Burland scale in relation to 'garden wall':</p> <p>Point 6.123 of Camden Local Plan 2017, Basements, refers to assessment of risk on the Burland Scale as follows: 'the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person's home can incur cost and considerable inconvenience to repair and redecoration. Applicants must therefore demonstrate in the BIA that the basement scheme has a risk of damage to neighbouring properties of no higher than Burland Scale 1 'very slight'. However point 7.3.5 of the BIA submitted states 'In accordance with the Burland Scale, the damage to the garden wall would fall into Category 2'.</p> <p>4. Burland scale in relation to rear terrace wall and chimney stacks:</p> <p>Point 7.3.2 of the BIA claims 'All structures/properties within the zone of influence have been assessed.' It is reasonable therefore to assume this includes the listed rear terrace wall of 27 and chimney stacks that connect 27 to the neighbouring properties. The BIA states in point 8.2.3 'The Damage Impact to surrounding structures within the zone of influence has been assessed as Category 2. This again contravenes the Council's requirement that risk of damage to neighbouring properties should be no higher than Burland Scale 1.</p> <p>5. Foundations and rear elevation:</p> <p>Structural issues are particularly relevant to this site, as architectural analysis of the foundations of Jeffreys Street terrace houses has characterized them as 'negligible by modern standards - no more than three to four rows of stepped bricks on a thin bed of compacted gravel and oyster shells.' Point n of Camden Local Plan 2017, Policy A5 Basements, requires applicants to demonstrate that 'proposals for basements do not harm neighbouring properties.' Given that 27 is part of a terrace, we do not understand why there is no specific mention in the BIA of the listed rear terrace wall and chimney stacks connecting 27 to neighbouring properties.</p>

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6. Proposed size of extension:

It is proposed to extend across the full width of the rear elevation, and 4.2 metres from the rear of the host building footprint. 4.2 metres exceeds the requirement, set out in point 2.4, criterion j, CPG Basements 2021, that a proposed basement extension should not exceed 50% of the depth of the host building footprint measured from the principal rear elevation. On the plans submitted, the host building is shown to have a depth of 7.46 metres. In addition, when a consultation with Camden Planning for 27 Jeffreys Street took place in 2016, it was indicated that an extension projection of 3 metres only would be likely to be granted. Camden Planning pointed out at the time that the extension depth of 4.3 metres at 29 Jeffreys Street was not regarded as a precedent because planning considerations had changed since the decision on 29's extension had been made.

7. Design and Heritage:

Jeffreys Street is sited in a conservation area, and Point 7.54 Details of the Camden Local Plan 2017 Policy D2 Heritage refers to the erosion of the character and appearance of a conservation area. It states 'The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments.' The closet wing is a traditional and historic architectural detail of 27, matched by its twin at 25. It is proposed to remove the closet wing's cast iron leg, and change the wing's original proportions by extending it downwards so it sits on top of the extension roof. This alteration destroys the context and original structure of the listed closet wing. CPG Design 2021 3.25 states that works to alter a listed building should be assessed on a case by case basis, 'taking into account the individual features of a building, its historic significance and the cumulative impact of small alterations.' It is also stated in this paragraph that 'Listed status also extends to any object or structure fixed to the listed building.' Point 3.28 makes it clear that Camden expects both original and historic features to be preserved: 'We will expect original or historic features to be retained and repairs to be in matching materials. Proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them.'

8. Historic flooding:

The Basement Impact Assessment submitted contains a serious error regarding historic flooding. Section 8.4 Hydrology, Surface Water Flooding and Sewer Flooding: Flooded Streets Map (LB Camden GHHS Figure 15) has been incorrectly annotated to exclude Jeffreys Street from areas known to be flooded in 1975 and 2002. In both years all the basements in Jeffreys Street were flooded via the sewerage system with water from Hampstead Ponds. Contemporary newspaper reports and insurance records in 1975 and 2002 attest to the serious damage caused - quite apart from the number of long time residents still living in the street today who experienced the floods first hand. CPG Basements 2021, Point 4.50 describes exactly the situation that obtained in Jeffreys Street in 1975 and 2002: 'While nowhere in the borough is identified by the Environment Agency as being flood prone from rivers or the sea, there are still parts that are identified as being subject to localised flooding from surface water. This is caused during times of heavy rainfall when the local combined sewer system is unable to deal with the volume and rate of flow.' Camden Local Plan 2017, Water and flooding, point 8.58 identifies surface water flooding that exceeds the capacity of the drainage system as the key flood risk to Camden. Point 5.1 of the BIA submitted acknowledges that 'Impermeable site area will increase due to the proposed development and more surface water than at present be discharged to the ground.' This reflects the fact that in addition to the extension itself, the substantial patio hard surface and the area of concrete steps up to the garden level would further reduce the permeable area at the rear of 27.

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				<p>8a. Cumulative flood risk:</p> <p>Point 6.124 of Camden Local Plan 2017, Basements, refers to Cumulative Impact. It states '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'. A number of basement extensions have already been constructed at the rear of the houses on the north side of Jeffreys Street, and those at 23 and 29 are in close proximity to this proposed basement extension. Point 8.68 of Camden Local Plan 2017, Water and Flooding, refers to updated climate change allowances published by the Environment Agency, including those for peak rainfall, which it states 'should be factored into any flood risk assessments.'</p> <p>This proposal fails the requirement of 6.113 Camden Local Plan, Policy A5 Basements, which states 'Although basement developments can help to make efficient use of the borough's limited land it is important that this is done in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment.'</p> <p>Bevis and Susanna Sale</p>

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2021/5916/P	Bevis and Susanna Sale	06/02/2022 19:08:51	OBJ	<p>Re: Planning application 2021/5916/P: 27 Jeffreys Street, London, NW1</p> <p>We object to this application for the following reasons:</p> <ol style="list-style-type: none"> <p>1. Definition of basement and lack of consultation: CPG Basements 2021, point 2.4, Lower ground floors, page 12, indicates how this application fails to meet the definition of a lower ground floor extension despite being presented as such. The basement status of the application is also tacitly acknowledged by the submission of a Basement Impact Assessment. Consultation with neighbours is required by Preliminary Stage 1.19, CPG Basements 2021. Despite this, prior to the submission of this application, there has been no 'consultation with adjacent infrastructure/asset owners' as set out in the applicant's BIA 1.1.4. We have had no opportunity to ask questions or seek clarification on anything prior to the submission of this application.</p> <p>2. Use of the term 'garden walls': CPG Basements 2021, point 4.8, states that 'All basement proposals should be subjected to the screening stage of a BIA to identify the matters relevant to assessment of local flooding and/or neighbour amenity and structural risks.' With regard to structural risks, the BIA repeatedly refers to the 'garden walls' of the neighbouring properties. The 'garden wall' referred to between 25 and 27 is in fact the rear wall of 25's brick built outbuildings. These outbuildings are approximately 120 years old with very shallow foundations, and are listed as part of 25's curtilage</p> <p>3. Burland scale in relation to 'garden wall': Point 6.123 of Camden Local Plan 2017, Basements, refers to assessment of risk on the Burland Scale as follows: 'the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person's home can incur cost and considerable inconvenience to repair and redecoration. Applicants must therefore demonstrate in the BIA that the basement scheme has a risk of damage to neighbouring properties of no higher than Burland Scale 1 'very slight'. However point 7.3.5 of the BIA submitted states 'In accordance with the Burland Scale, the damage to the garden wall would fall into Category 2'.</p> <p>4. Burland scale in relation to rear terrace wall and chimney stacks: Point 7.3.2 of the BIA claims 'All structures/properties within the zone of influence have been assessed.' It is reasonable therefore to assume this includes the listed rear terrace wall of 27 and chimney stacks that connect 27 to the neighbouring properties. The BIA states in point 8.2.3 'The Damage Impact to surrounding structures within the zone of influence has been assessed as Category 2. This again contravenes the Council's requirement that risk of damage to neighbouring properties should be no higher than Burland Scale 1.</p> <p>5. Foundations and rear elevation: Structural issues are particularly relevant to this site, as architectural analysis of the foundations of Jeffreys Street terrace houses has characterized them as 'negligible by modern standards - no more than three to four rows of stepped bricks on a thin bed of compacted gravel and oyster shells.' Point n of Camden Local Plan 2017, Policy A5 Basements, requires applicants to demonstrate that 'proposals for basements do not harm neighbouring properties.' Given that 27 is part of a terrace, we do not understand why there is no specific mention in the BIA of the listed rear terrace wall and chimney stacks connecting 27 to neighbouring properties.</p>

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