

## Hampstead Neighbourhood Forum

9 July 2018

Stuart Clapham  
Planning Solutions Team  
Camden Council

Re: 2018/2859/P, 6 Streatley Place

Dear Mr Clapham,

The Hampstead Neighbourhood Forum would like to submit the following objections to the new proposal for 6 Streatley Place.

### Deficiencies in the Basement Impact Assessment

1. Unsatisfactory and improperly documented estimate of the damage to the neighbouring properties.

Harban's report provided by the applicant has only one sentence on the matter: "damages to nearby structures will be contained within Burland scale 1". There is no systematic and thorough supporting demonstration for this or any supporting calculations. This breaches Policy A5 (4) of the Camden Local Plan that states that "the Council will require applicants to demonstrate that proposal for basements: do not harm neighbouring properties ...risk of damage to neighbouring properties no higher than Burland Scale 1." It also breaches Policy BA1 of the Hampstead Neighbourhood Plan ("HNP"), which states: "construction will not be allowed to proceed where there is evidence that damage to neighbouring properties would exceed Burland Scale 1". No such related evidence to the contrary have been provided. It also does not comply with HNP 5.12 either as the assessment has not demonstrated or shown the location of the predicted impact nor demonstrated the methodology and provided supporting engineering calculations that stand up to scrutiny.

Related evidence:

- In page 16 of the site investigation report, compiled by Soil Consultants, it is mentioned: "details of the likely structural loads were not available at the time of compiling this report." Without such details, we do not see how can one accurately assess the likely ground and structural movements and predict accurately the likely damages on the Burland scale. Furthermore, in page 17 of the same report, the following is stated: "the determination of appropriate earth pressure coefficients and the pattern of earth pressure distribution should be carried out by the geotechnical designer; these will depend upon the type/geometry of the wall and

the overall design approach...Significant vegetation is present on site and both the Bagshot Formation and Claygate Member will be susceptible to desiccation effects. The wall designer will need to take account of the risk of potential swelling soils behind the retaining wall". No such considerations appears to have been taken into account and under such circumstances one cannot predict reliably the likely Burland scale damage.

- Burland scale damage: The only assessment of Burland scale damage is in page 3 of Ian Harban's report of June 2018 where it is stated: "The proposals are considered entirely feasible using normal mini piling techniques and sequential construction techniques with only minor risk of non-structural damage to nearby structures, which would be within category 1 of BRE Digest 365".

This is no attempt to provide supporting engineering and ground movement calculations as to how the author reaches such conclusion.

## 2. Unsatisfactory monitoring of the borehole.

In the report 10219/AP, provided by Soil Consultants, there were only two groundwater monitorings, one conducted at 10.30 am on 10/04/2018 and one conducted at 8.10 am on 25 April 2018. This is wholly unsatisfactory all the more so, that on 10 April 2018, there was no rain for at least 4 hours prior to the measurements. Furthermore, on the 25 April at 8.10 am, there had been no rain water in the previous 12 hours. (source: <http://nw3weather.co.uk/> )

This is contrary to the HNP 5.12a, which recommends that "boreholes measurements may need to be contacted in periods of contrasting rainfall and over a period of several months covering wet and dry seasons"

As noted on page 24 of the BIA, the site is within a wider hillside setting in which the general slope is greater than 7o; hence, one needs to carefully assess the terrain during sustained and prolonged period of rain not only for the feasibility and the requirements of the proposed scheme but also regarding the possible dam effect that such a proposed basement could trigger and with the associated potential risk of flooding the neighbourhood properties and/or street.

## 3. Only one borehole

There is only one borehole location where water effects are attempted to be assessed: BH1. For a site with such a large proposed basement there should be a minimum of three boreholes so as to have triangulation that can model the water flows and in any circumstances there is also the requirement to testing of the ground and water measurements in more than one location. This is unsatisfactory considering the complexity of the terrain: on a slope with Bagshot formation in an area geologically sensitive. This also is contrary to 5.12 of the Hampstead Neighbourhood Plan (HNP), which recommends additional steps for the Basement Impact Assessment to account for unusual ground conditions in Hampstead.

Related evidence:

- In page 21, of the report commissioned to Soil Consultants, the following is mentioned: “it is noted that a number of groundwater inflows occurred within the Claygate Member.”
- Page 15 of the Groundsure report shows that the terrain consists of Bagshot Formation -Sand. This is the type of terrain most susceptible to high water conductivity and soil erosion. Furthermore in the Mola report of April 2018, entitled Historic environment assessment, in Fig 3 of the Geology map, it is clearly shown that this site rests on Bagshot formation. This contradicts other reports provided by the applicant.

In page 11 of the Soil Consultants report it is stated that the site lies within 100m of a watercourse, well or potential line.

- The Groundsure report mentions in page 42 in no. 7,7.1: “ British Geological Survey groundwater flooding susceptibility areas within 50m of the boundary of the study site: Identified Clearwater Flooding or Superficial Deposits flooding Clearwater Flooding”
- Page 21 of Soil Consultant’s report, states: “It is noted that a number of groundwater inflows occurred within the Claygate Member” and “the likelihood of soil swelling causing tension within the shaft will also need to be addressed”. This demonstrates the requirements to conduct further investigations before determination.

#### Absence of a Basement Construction Plan

4. There does not appear to be a formal Basement Construction Plan, contrary to HNP BA2. Policy BA2 (2) requires that such plans include information such as drawings, which illustrate how the construction will overcome any potential harm to neighbouring properties. NHP BA2 (3) requires the applicant to demonstrate that they are using the best available piling method to minimise damage to neighbouring properties. This information is not provided.

#### Issues with the Construction Management Plan

5. The Construction Management Plan does not conform to the HNP BA3 Local Requirements for Construction Management Plans.

The Construction Management Plan does not comply with HNP paragraph 5.24, which stipulates no work on Saturday and high impact activities to be restricted 9am-noon and 2pm-5.30 pm on weekdays.

6. Contrary to HNP BA3 (1), the cumulative impacts of other development proposals does not appear to have been taken into account. This is a significant oversight as there is currently a massive construction and basement project taking place in 29 New End.

There appear to be no details regarding the routing of demolition, excavation and construction vehicles, contrary to BA3 (2) or how the construction and demolition might impact the elderly and disabled, contrary to BA3 (3).

HNP paragraph 5.21 states that “the more complex the proposed basements, the more details the levels of information which should be provided at the application stage”. Given the complexity of the construction, the information provided of page 17 of the CMP of May 2018 (“the impact of noise and dust is kept a very minimum”) is insufficient.

7. Policy TT1 (3) of the HNP states *“Planning applications which can reasonably be expected to result in significant additional motor vehicle journeys in the plan area during construction should provide a full or outline Construction Management Plan at an appropriate level of detail to allow a robust assessment of the impact of the proposal on air quality and levels of pollution in addition to any noise, vibration or obstruction of the highway in the Plan area. The CMP should take into account the cumulative impact of development on the Plan area and demonstrate that the impact of any such vehicle journeys will be appropriately mitigated to minimise their impact on air quality and levels of pollution.”* Pollution is defined by the NPPF as *“Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.”*

Paragraph 6.26 of the HNP states that *“Where a Transport Assessment, Transport Statement, DSMP or CMP is required, and in line with NPPF paragraph 189, the Council will take into account evidence provided to it that the applicant has consulted the local community affected by the development and has taken their reasonable concerns regarding any potential harm to the area into account.”*

In this instance, the draft CMP does not yet allow a “robust assessment” of the impacts defined in Policy TT1 (3) in the following respects :

- The unladen weight of all vehicles needs to be defined. The HNP imposes a limit of 7.5 tonnes unladen weight for all vehicles.
- The schedule and number of lorries needs to be set out with sufficient clarity to enable the impact on the surrounding transport system and on levels of pollution to be understood. In particular the map on page 25 needs to show the expected schedule of journeys (i.e. the number per working day) by each size of vehicle along each route.
- Rather than sketch options for compounds and vehicle routes, the application should propose a single clear plan for compounds and vehicle movements so that its impact can be assessed.

- The proposal to include “limited closure of Streatley Place” (page 16) needs to be clarified so that there is a clear understanding as to the extent and duration of any closures and the impact on surrounding occupiers.
- Greater clarity is needed on the integration of the building works with refuse collections and service deliveries taking place via Streatley Place. A system of ‘ad-hoc’ agreements on these matters will not be sustainable over a 100 week construction period.

8. Given the deployment of one or two offsite compounds, which are intended to offer temporary storage of spoil and building materials before/after transport, the need for one or two permanent skips (in addition) is not supported.

9. The CMP appears to propose that vehicles drive up Back Lane and turn into Heath Street. This turning is very tight (over 90 degrees) and the section of Heath Street at this point very narrow. Any difficulty experienced in making this turn will have considerable potential to disrupt traffic running along this stretch of Heath Street, which is already highly congested, including on the 268 bus route. An alternative construction route will almost certainly be required or the size of vehicles severely restricted on this route.

10. The CMP appears to require all lorries approaching the New End compound to reverse down New End Square. This considerably increase the potential for noise and vehicle pollution in addition to disruption to neighbouring occupiers who would find it very difficult or impossible to move their vehicles during this time. Again, a severe restriction on vehicle size to minimise the time taken to manoeuvre vehicles down New End Square would seem essential.

11. Residents need to be consulted on the draft CMP once these important additions have been made and they are therefore able to understand the overall impact on them. In view of the significant impact on surrounding streets and consideration of the ongoing development at 29 New End, consultation should include residents and occupiers in those streets which are being used by construction traffic from the site.

Conclusion: The overall conclusion from reading the draft CMP is that access to this particularly site is so fraught with difficulty and the access routes so precarious that the capacity of the site to offer development potential is (and has always been) severely restricted. With modern construction techniques, some development is possible, but the inclusion in the application of a basement development (and the consequent need to remove spoil) takes the amount of construction vehicle traffic and the level of disruption far beyond what are realistic levels. With basement construction, the total number of skips has been estimated at over 100, meaning that over 100 tonnes of waste will have to be removed along a narrow pathway and then through narrow and congested roads over a period of 100 weeks.

For the reasons stated above, we urge Camden Council to reject this application.

Sincerely,

Janine Griffis

Chair, Hampstead Neighbourhood Forum