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2nd March 2018

Dear Chairman and Councillors,

Objection to planning application PP/17/07888 - 132B Fulham Road, LONDON, SW3 6HX

I represent Ms Sissel Glastad of Flat 3 in 35-37 Cranley Gardens (comprising ground floor, basement and the garden) and write to express the concerns of my client and other neighbours who **object** to this application.

There have been formal objections from many properties in the immediate vicinity of the application site. This letter cross-refers to detailed objections lodged by other neighbours, including the owner-occupier of Flat 16, 37 Cranley Gardens and specialist reports which he has submitted.

This letter also conveys concerns on behalf of 35-37 Cranley Gardens Ltd, the Management Company for that block and which is made up of the various long leaseholders.

We assert that insufficient weight has been given, in the Officer's Report which is before you, to the planning merits of this application as well as the clearly expressed and reasonable objections raised by adjoining residents. We submit that the appropriate course is for planning permission to be refused.

1. Accordance with Basements Policy CL7

The Supporting Text to CL7 states

"34.3.46 This policy applies to all new basement development. For the purposes of this policy, basement development is the construction or extension of one or more storeys of accommodation below the prevailing ground level of a site or property." (emphasis added)

Policy CL7 provides that

"The Council will require all basement development to:

... b. not comprise more than one storey."

The ground floor in the house which is the subject of this planning application would be 1.2 metres below ground level. Below that would be a large basement, which would include a family room, gym and a bedroom.

The excavation and construction would create more than one storey below the ground level of the site. The proposals therefore appear to seek endorsement of basement excavation which would conflict with CL7.

It prompts the question of whether construction of a “ground floor” which is 80% below the ground level of a site together with a basement underneath it could be considered CL7-compliant.

2. Risks from the proposed excavation

The Council’s Planners are not Structural Engineers. They do not have the specialist expertise that is required in order to determine whether submissions made by the Applicant’s Structural Engineer are correct and fully address legitimate concerns, or whether they are merely reasonable contentions.

Just because a Construction Management Plan appears to “tick the box” of Policy requirements, that does not equate to it being beyond question.

Another experienced Structural Engineer has reviewed the basement proposals and Applicant’s CMP. His detailed Report has been provided to you.

Mr Michael Blacker, F.I. Struct.E. C.Eng, considers that the Applicant’s engineers have NOT properly considered ground movement. Amongst the concerns raised by Mr Blacker about the excavation are: -

- “The granular nature of gravel is far more likely to “run” into an excavation, without proper precautions, than a clay soil. Should the gravel start to run into the excavations the movement, especially to the listed building and the wall in front of it, will probably be far greater than they have anticipated.”
- “132 Fulham Road does not appear to have been constructed to a particularly high standard and it will be greatly affected by any slight movement.”
- “Little or no thought has been given to the potential damage that vibration may cause to the adjoining buildings.”

A specialist Heritage architect, Paul Velluet M.Litt., RIBA, IHBC also considers that the extensive excavation works WOULD pose significant risks to the continuing integrity and stability of the flank wall of Listed no. 132.

Contrary to what is related in the Officer's Report before you, the report by the Applicant's structural engineer does not say that the works would not affect adjoining properties. It offers only that they "should" not do so.

As Mr Velluet points out, the Officer's Report makes no reference to the inherent risks involved in carrying out works of excavation adjacent to and below the footings of an early-19th century, war-damaged Listed building.

The fragility of no. 132 is well-documented in the objection letter from its owners, the Kroll family.

3. Residential amenity

Despite the voluminous set of documents submitted with this application, impacts upon the residential amenity of adjacent flats in no. 37 Cranley Gardens have not been identified and assessed – and so neither has that exercise been carried out in the Officer's Report before you.

As detailed in specialist Reports submitted on behalf of neighbours: -

- A very large window would be installed where there is presently none.
- The perforations in the Corten panels would result in severe over-looking of flats in no. 37.
- A 1.5 metre increase in the height of the boundary wall with no. 37 would reduce significantly the level of daylighting to habitable rooms and result in an unacceptable sense of enclosure to occupiers of the lower ground floor flat.

No clear plans or sections have been submitted showing the relationship between the proposed development and the existing windows serving rooms in the lower ground floor flat and other flats in no. 37 Cranley Gardens.

It is simply not possible on the basis of the application drawings to ascertain the impact of these proposals on occupiers at no. 37.

It would therefore be wholly inappropriate for planning permission to be granted in such circumstances.

4. Heritage issues

Whilst Corten steel and 'board-marked concrete panels' may be successful in some schemes, we submit that they would "jar" badly in the context of surrounding buildings and so fail the Conservation Area and Listed Building test. In the absence of an acceptable

replacement, demolition of the existing building therefore not be appropriate (as the Report of Paul Velluet explains).

5. Highways and Transportation

All construction traffic would service the site from being parked on the Fulham Road. There is a double-bus stop on the other side of the road.

The Council's Transportation Officer has raised several concerns about the Applicant's CTMP, including: -

- The swept path analysis is inadequate. It needs to be re-done so as to consider how large vehicles would pass.
- Significantly, there has as yet been no consultation with TfL and London Buses – nor with the emergency services or nearby hospitals.

As other basement schemes have demonstrated (that at 7 Charles II Place being one example), leaving such matters until discharge of Conditions stage is leaving it too late. Planning permission should not be Granted on the basis of such uncertainty.

In light of the above and representations made by other objectors, we ask that this planning application be refused.

Your sincerely,

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