



Chris Banks &lt;bankssolutionsuk@gmail.com&gt;

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**Re: RBKC Basements Programme Revision**

1 message

**Robina Rose**

4 September 2014 16:27

To: Chris Banks

Dear Chris Banks

Thank you for your communications and apologies for my late reply.

Whereas I appreciate that the Council have moved somewhat on the issue of Basements since their first occurrence and guidelines, I feel they still fail to address the most fundamental of geological issues, both on neighbouring buildings and flood risk. (Which we are already beginning to see happen).

In view of the fact that this process has been concurrent with the planning and construction of Crossrail, with its leading geotechnical experts based at Imperial College, within RBKC itself, (& Bazalgette's original drawings lodged in the library opposite Town Hall) this would seem to be negligent, let alone UNSOUND.

The words CLAY and gravel appear just once, and then as a footnote (7) within the reasoned justification, and in CL7 itself, not at all. (Although repeatedly in Ove Arup, Baxter and the Thames Water Counters Creek report)

Also concurrent have been considerable consultations with Thames Water about the river Counters Creek, culverted into a sewer in the 19th Century, and now full to capacity, as well as incorporating the main storm sewer from Brent and Camden (due to be dealt with in 2020). The attendees have been almost totally distinct from those participating in the long run of "Basement" consultations, and are apparently now co-ordinated by someone in Hammersmith and Fulham as part of the Tri-borough arrangement who has not been part of any of these processes.

We are also discussing the juxtaposition of two fundamentally differing construction processes...the 19th century Terrace one of flexibility (Lime Mortar and shallow Foundations - in order to "float" on the London Clay as it expands and contracts according to variable moisture content (inevitable with re-routing of underground streams eg `Notting Hill - and bound to increase with removal of the vast amounts of ground removed by basement developments) superimposed on by one that is rigid. Deep concrete piles, which will no longer with its neighbour.

The lack of co-ordination between the departments of Environment, Traffic and Highways, Planning, and Building Control (c50% now privatised on individual projects within RBKC and therefore unaccountable (due to commercial confidentiality) means that phrases such as "execution with special care"(34.3.62) become meaningless as there is no means of co-ordinated implementation or monitoring within the system.

I feel that the above comments relate to all of your specific questions, and will therefore be attending all of the

hearings(succinctly and specifically, with references, as they arise.

MATTER 1: LEGAL COMPLIANCE

MATTER 2: DEFINITIONS

incremental effect...ie as if large site  
red street

MATTER 3: PRIORITY ORDER

adverse impacts

MATTER 4: GARDEN/OPEN AREA

effective or unsound CL7 50% + exception clause  
NO GEOLOGY

MATTER 5: one storey restriction

NO GEOLOGY (see Arup Thames Water, and Baxter)

MATTER 6: LISTED BUILDING

pavement vaults? + CATERING FOR DIFFERING CIRCUMSTANCES

MATTER 7: LIGHTWELLS & RAILINGS CL7

MATTER 8: ONE METER of SOIL

MATTER 9: WASTE and WATER(BREEAM)

Implementation?????

+

should policy be led CASE by CASE on IMPACT ASSESSMENT

MATTER 10: STRUCTURAL STABILITY

2 building languages. Clay GROUNDWATER displacement.....tail that wags  
58.Core strat not sound matter 9a

MATTER 11: OTHER CRITERIA & WORDING

Light Pollution. led by IMPACT ASSESSMENT ...case by case

yours sincerely

Robina Rose