
Subject: RBKC Basements Policy

Date: 13 November 2014 11:59:56 GMT

To: Chris Banks <bankssolutionsuk@gmail.com>

Dear Chris Banks

Thanks for your indefatigable support to us all throughout this seemingly endless process.

I would like to submit one final comment for the Inspectors consideration.

Since the end of the hearings I have been researching the basement policies of other boroughs - Westminster and Camden in particular.

What emerges is that they have taken far more rigorous stances on precisely the issues that I attempted to flag up throughout the Hearings-

those of LONG TERM and CUMULATIVE (or incremental) Impacts on groundwater (particularly on CLAY) and thereby adjacent neighbouring properties.

I was frankly shocked to have my seemingly moderate request to have the words LONG TERM and INCREMENTAL (cumulative) EFFECT inserted into the Policy CL7, particularly "n. be designed to safeguard the (LONG TERM and INCREMENTAL/CUMULATIVE) structural stability of the application building, NEARBY BUILDINGS etc." dismissed so lightly*.

This is at total variance with the stance taken by both Westminster and Camden, (with which I am now most familiar).

WESTMINSTER refers specifically to its underground Rivers and their tributaries. RBKC, despite the extensive dialogues that have been

taking place with Thames Water about the full to capacity culverted River/sewer Counters Creek throughout this long policy consultation period, have not.

CAMDEN (which has far more hydrogeological similarities with Notting Hill than it does with Chelsea) demands that a hydrogeologist is part of the team from the earliest stages, and has produced a detailed Geological, hydrogeological and hydrological study of the whole borough.

(The day that the Arup and Baxter technicians were at the Hearings was a wasted opportunity to get to the bottom of it).

This disparity alone with RBKC renders its basement policy UNSOUND.

There needs to be either a moratorium on the Notting Hill Counters Creek Area/ and or separate policy.

*CL7d concerns itself with "damage or LONG TERM THREAT to trees", but it would seem that this is not extended to include adjacent buildings, which are clearly at greater risk than the application building, particularly on London clay, as this is where groundwater movement especially in terraces and on hills (with additional underground springs and waterflows)

Or does the Inspector agree with Jonathan Bores spectacular statement that they "could not be expected to consider what happens in 20 yrs time" ?

As he will recall, the room fell silent.

Many felt, as I did, that, particularly in a borough 70% of which is Conservation Area, that this was one of the things that Planning was for.