



GEOTECHNICAL CONSULTING GROUP

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Sarah Round,

2nd September 2013

Dear Ms Round,

PROPOSED CHANGES TO RBKC'S PLANNING POLICY FOR BASEMENTS

Thank you for asking us to give our views on the Council's proposals and the background information to them. As you know, we carry out a lot of work in the area and are well aware of the issues on all sides.

We have reviewed your current draft representation report and confirm that we are in agreement with your objections.

We have read the Alan Baxter (AB) report which has been prepared for the Council with a mind to the proposed policy changes. The report and indeed the report prepared previously by Arup for RBKC is helpful in explaining the issues that need to be considered when contemplating basement construction in the Borough. They do not, however, make anything other than 'rule of thumb' statements which justify their recommendation concerning limits to the plan area of a basement, nor make any statements at all concerning limiting the depth of basement construction, nor any suggestions that there should be no basements under listed buildings. The report does not therefore provide any reasoned justification for the proposed changes in RBKC's Planning Policy based on engineering matters. Both this document and the one prepared by Arup should help RBKC's Planners (and Councillors) understand the issues, but as AB say, each case must be judged on its merits. We do disagree with some details of what they say, but these are details, not substantive points. However in some cases we fear that, taken literally by lay persons, they may result in unnecessary concern and work.

The message that comes out of both the Arup and the AB reports is that it is absolutely essential to make sure that those concerned with both design and construction of this sort of development have the right qualities. I also entirely agree with the need to enter into dialogue with the parties likely to be affected at an early stage. This is just common sense.

We are well aware that the main issue that RBKC has to deal with is concerns over the number and scale of basements being constructed in the Borough. This is entirely understandable. The Council seem to think that by raising concerns over the engineering issues, they can justify reducing the scale of any single scheme. In our opinion this is misguided because it can be challenged. Deeper basements would be more risk than shallower ones if all basements were done by the same team, but done by a competent team, basements of any reasonable depth should not give rise to unacceptable risk. However, it doesn't work that way. Larger projects do tend to have experienced teams. The projects most at risk are the smaller projects which are carried out by inexperienced teams. These are the main ones to target. From an engineering perspective the most important thing is to find a way of ensuring that all projects are done by competent and experienced teams.

In summary either the proposed policy changes cannot be justified on the basis of the advice that RBKC have received from their consultants or, in some cases (for example in the case of limitations based on the proportion of a plot taken up by basements) the advice given is not backed up by proper engineering considerations. Were the latter advice to be reasonable, RBKC should be telling their residents that they must not place an impervious surface over their gardens.

I can confirm that I would be happy to support you when the draft policy is considered at Examination in Public.

Yours sincerely

For Geotechnical Consulting Group LLP



Hugh St John