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From: **David Peres Da Costa** <David.PeresDaCosta@camden.gov.uk>

Date: Mon, 23 Oct 2023 at 15:24

Subject: RE: Reports / Re-development of 23 Ravenshaw St. NW6 1NP to 6 New Flats - 2023/3975/NEW

To: Chris Taylor <chris.stuart.taylor@gmail.com>

Hi Chris

I have reviewed the list of reports and can provide the following comments.

1. Air Quality Assessment prepared by Air Quality Assessments Feb. 2015;
  - You will need to submit the attached air quality pro forma and this should allow you to determine whether the existing AQA covers all the information that is required. Any information gaps identified will need to be rectified.
2. Tree survey prepared by Tree Reports Feb. 2014;
  - This report is likely to be acceptable as the removal of the only tree on site was agreed in the officer's delegated report for 2020/2936/P
3. Noise and Vibration Assessment prepared by KP Acoustics Jan. 2015;
  - This report suggest that windows at the rear of the proposed development would have to be kept closed in order to provide appropriate mitigation from the railway noise. Therefore mechanical ventilation should be provided to the affected rooms. If mechanical ventilation has a noise impact this should be assessed in the noise and vibration Assessment. The 2015 Noise and Vibration Assessment was not assessed as part of the previous application. Therefore please check that the Noise and Vibration Assessment meets the minimum requirements set out below.

The minimum below information is expected to be submitted as part of an acoustic report:

- description of the proposal;
- description of the site and surroundings, a site map showing noise and vibration sources and measurement locations;
- background noise levels measured over a minimum of 24 hours;
- details of instruments and methodology used for noise measurements (including reasons for settings and descriptors used, calibration details);
- details of the plant or other source of noise and vibration both on plan and elevations and manufacturers specifications;
- noise or vibration output from proposed plant or other source of noise and vibration, including:
  - noise or vibration levels;
  - frequency of the output; and
  - length of time of the output.
- features of the noise or vibration e.g. impulses, distinguishable continuous tone, irregular bursts;
- specification of the plant, supporting structure, fixtures and finishes;
- location of noise sensitive uses and neighbouring windows;
- details of measures to mitigate noise and vibration;
- details of any associated work including acoustic enclosures and/or screening;
- cumulative noise levels; and;
- hours/days of operation.

4. Preliminary Ecological Appraisal by Urban Edge Environmental Feb. 2015;
  - I have asked Nature Conservation to confirm this is acceptable
5. Urban Greening Factor Plan from application 2020/2936/P;
  - This is likely to be acceptable (although it is not readily apparent whether this particular document was reviewed during the previous application)
6. Construction Management Plan Draft dated Oct. 2021;
  - This is likely to be acceptable
7. Daylight, Sunlight and Overshadowing Reports;
  - The BRE guidance has been updated. ADF and NSL have been replaced for new accommodation by Spatial Daylight Autonomy, therefore the daylight and sunlight report for the proposed development will need to be updated to include this test. There is also a new sunlight exposure test. Please refer to the BRE 'Site layout planning for daylight and sunlight', 2022 edition.
8. Energy and Sustainability;
  - Please submit the attached pro forma. Any information gaps identified will need to be rectified.
9. Water Efficiency Calculation
  - This is likely to be acceptable
10. Flood Reports
  - This is likely to be acceptable in relation to flood risk only. The information supplied in "FLOOD RISK REPORT-UNDA-89947-Camden Pro Forma" does not appear to be up to date. The officer's report for 2020/2936/P confirms the following:

"22.68m<sup>3</sup> of storage is required to attenuate the runoff for all storms up to and including the 1:100 year + 40% climate change event. A Hydro-Brake would be proposed as the outlet control, restricting the maximum flow rate to 0.6l/s to the combined sewer within Ravenshaw Street. There is also an option to use the collected water to feed header tanks for W.C. flushing and garden irrigation. Details of final SUDS design would be secured by condition."

Whereas "FLOOD RISK REPORT-UNDA-89947-Camden Pro Forma" states that no attenuation tank is required.

<b>Storage Attenuation volume (Flow rate control) required to meet greenfield run off rates (m<sup>3</sup>)</b>	N/A - to sewer
<b>Storage Attenuation volume (Flow rate control) required to reduce rates by 50% (m<sup>3</sup>)</b>	N/A - to sewer
<b>Storage Attenuation volume (Flow rate control) required to meet [OTHER RUN OFF RATE (as close to greenfield rate as possible)] (m<sup>3</sup>)</b>	N/A - to sewer
<b>Storage Attenuation volume (Flow rate control) required to retain rates as existing (m<sup>3</sup>)</b>	N/A - to sewer
<b>Percentage of attenuation volume stored above ground,</b>	0% - due to site constraints and refer to FRA

Please complete the attached drainage pro-forma which has been updated since the previous application.

11. Basement Impact Assessment
  - You should provide an addendum, prepared by the original author of the BIA or someone with qualifications set out in CPG Basements page 22, confirming that the revised scheme would have no impact on the findings and recommendations of the previous BIA.
12. General Utility Reports
  - These are not required

## Other

Please ensure the submission responds to transport comments made during the previous application 2020/2936/P.

- The London Plan together with the London Cycling Design Standards require at least 5% of the total number of cycle parking facilities are allocated for non-standard cycles (for example adaptive cycles and cargo bikes). Therefore the development should include 1 non-standard cycle parking.
- Short-stay cycle parking should be within the curtilage of the development. The development should provide 2 visitor cycle parking.
- The route to the cycle storages should not have more than two sets of doors, and all doors leading to the cycle storages should be automated with a push button or pressure pad. The recommended external door width is 2 metres and the internal door width should be at least 1.2 metres.

The Access section of the current Design and Access appears to be very short. The Accessibility statement (included within the Design and Access Statement) should explain how your proposals meet the principles of lifetime neighbourhoods, and how you have achieved the highest practicable standards of accessibility and inclusivity.

Please ensure that you provide the following with any new submission:

For new build housing, the statement should include plans, or reference plans, that show the following to demonstrate compliance with the optional Building Control requirements:

- the measures you use to achieve the requirements of the relevant standards under Building Regulations Part M4(2)
- for schemes with six or more additional homes, the layout of the wheelchair adaptable units, their location, and annotate to show you meet relevant standards under Building Regulations Part M4(3)

Kind regards

David

David Peres Da Costa  
Principal Planning Officer

Telephone: 0207 974 5262

On Mon, 25 Sept 2023 at 18:38, David Peres Da Costa <David.PeresDaCosta@camden.gov.uk> wrote:

Dear Chris,

RE: 23 Ravenshaw - 2023/3975/NEW

All the files were received.

Your pre-application letter refers to the LPA signing a Memorandum of Understanding (MOU).

The MOU appears to seek to bind the Council to matters that go beyond what would normally be provided during pre-application advice. As a matter of principle it is unlikely that the LPA will be willing to sign such a document.

In addition, some of the undertakings are inappropriate. Consulting elected members is not appropriate for a minor application such as this. Consulting "any and all design review panels and any officers with responsibility for design matters in whatever form they may be constituted" is also excessive and may be counterproductive as it is likely that the more design professionals you consult, the more likely it is that concerns will be raised and further amendments will be sought. It would be better to seek targeted design advice from those who would be consulted on the application if and when it is submitted.

The undertaking that requires "confirming precisely what outstanding objections the LPA has to the wording of the s106 Unilateral Undertaking submitted with the previous application" raises concerns that the applicant wishes to make a unilateral undertaking rather than a bilateral Section 106 agreements. The Council does not generally accept Unilateral Undertakings as additional work is required to proof read the applicant's unilateral undertaking as opposed to using the standard text in the Council's s106 agreements.

Likewise, a commitment to make a site visit to inspect a view that the "planning officer deems relevant and important" appears to pre-judge that the planning officer will identify such a view for the amended proposal. It is noted that the officer's report for the previous application identified concerns about views from within private properties:

It would be apparent from the private realm of rear gardens in the street, and in private views from flats in Ellerton Tower on Mill Lane and from flats in the Brassey Road Estate to the south of the railway. It would also be visible from the railway line to the rear.

Given that these views are only available from private properties, officers will not be able to give an undertaking to inspect such views.

Having reviewed your proposal, the rear elevation seems much improved and it seems more likely we would be able to support your scheme (subject to internal review within my team), although we are likely to suggest some minor amendments to improve the design. A Council drafted s106 agreement will be required (rather than a unilateral undertaking) and payment of the affordable housing (AH) contribution will be required before the development commences. It is not clear from your letter whether you are maintaining your position at the appeal which sought a later payment trigger for AH. Your position was not supported by the inspector at appeal and the council is unlikely to change its position on this matter.

Notwithstanding the need to agree the trigger for the AH payment, the signing of a memorandum of understanding as a prerequisite to pre-app advice does not appear to take us forward when the design issue which was central to previous refusals may now be significantly resolved.

Kind regards

David

**Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.**