



Camden Council

Planning – Development Control

Camden Town Hall
Argyle Street
London
WC1H 8EQ

THORNE HILEY Limited

10 Furnival Street

London

EC4A 1YH

www.thornehiley.co.uk

Dear Tony / Jonathan

**24-28 WARNER STREET – PLANNING APPLICATION SUBMISSION –
ADDITIONAL INFORMATION REQUESTED**

Following submission of a full planning application on the 8th April 2011 in relation to the above property, a formal response was received from Camden Borough Council on the 3rd May 2011 requesting further information.

In response to this request for further information please find attached the completed 'Incomplete Reasons Schedule' which together with the contents of this letter and the additionally supplied information.

Responding to the points raised in Camden Borough Council letter dated the 3rd May 2011, in seriatim:

1. Section 19 has been amended as requested and the amended version is enclosed;
2. Please find enclosed revised section and elevation drawings as requested;
3. The Council have stated that *“with respect to the justification for demolition as provided in your Design & Access statement, it is considered that the information does not fully address policy HE9 of Planning Policy Statement 5, ‘Planning For A Historic Environment’. Please provide more detail in order to address the specific requirements of the policy and in support of the information/statement(s) that you make.”*

The question of demolition was raised during the pre-consultation process and discussed at length during the meeting. Following this, the scheme and indeed the planning application for Warner Street was carefully compiled to address this point specifically.

Date:
4th May 2011

Contact:
Oliver Thorne

Telephone:
07507 600 283

Email:
Oliver@thornehiley.co.uk

Our Ref:
Warner_St_planning_app



THORNE HILEY
PROPERTY CONSULTANTS

Thorne Hiley Limited is a Private Limited Company No 07032622

Registered Company Address: The Old Steppe House, Brighton Road, Godalming, Surrey, GU7 1NS



RICS



It was clearly stated at the meeting, and in the subsequent report that followed, that the current buildings on the site hold little or no architectural interest / significance (please refer to the pre-app meeting report "*[The site] is not identified in the Hatton Garden Conservation Area statement as a positive contributor, and is considered to be of no particular architectural or other merit*"). The Conservation Area within which the site exists is focussed primarily on other aspects including ensuring the appropriate use for buildings in the interests of primarily public benefit.

Addressing the specific elements of PPG5 Policy HE9, we do not believe the property represents a "designated heritage asset", indeed this has never been suggested previously and as such we are inclined to consider any reference to protecting such assets as not applicable in this case. Annex 2 of PPS5 defines as a "Heritage Asset", '*a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions*'; heritage assets are also defined as '*valued components of the historic environment*'. Equally, the property is not listed or situated in a World Heritage Site. There will be no loss culturally, environmentally or socially from the proposed scheme, indeed the proposal will bring significant social benefits and an enhancement to the conservation area through an improved use providing much needed high quality housing to the borough both in terms of massing and scale alongside the surrounding buildings.

There is equally considered to be no loss economically as the current business is in terminal decline due to the increased costs and falling sales associated with the inappropriateness of the location for a business of this type (evidenced by the independent company assessment attached – which is strictly confidential but clearly evidences the financial position. 2011 business rates alone are costing the owners a significant amount of money as trading conditions continue to decline). A careful options appraisal of the potential for the premises was undertaken including consulting Camden back in 2009/10, with regard to possible uses, and it was agreed that residential was the only viable use which also provided significant public benefit. Based on our market research there is little / no demand for B8 units of this type as confirmed independently by the comments contained in Richard Susskind and Co's letter (16/03/2011) attached to the application. Businesses of this type have moved out of central London where they can take advantage of lower rents, rates and service charge, and lower transport costs. The proposed scheme in terms of both use and design will positively contribute to its significance. Any concerns in relation to archaeological issues should be referred to the CgMs report appended to the application which clearly states the likelihood of archaeological significance is extremely remote.

4. We feel very strongly about this additional request for information in relation to slope instability and subterranean (groundwater) flow which is completely new, having never been raised, requested or even discussed as part of the pre-consultation process. By engaging Camden, and paying them for their advice, the applicant has adopted a text book approach to this planning application having given the Council every opportunity to raise any concerns, request information / survey and so on. Indeed, the applicant has already suffered financially from the additional burdens of the LDF which we were informed was being adopted at the pre-consultation meeting requiring significant alterations and further survey work at personal expense to our client. A good example is affordable housing provisions which we understand will now apply to this scheme of 12 units and which will have a significant effect on the end value of the development and therefore financial viability.

The proposed scheme includes a very limited basement located within the existing footprint of the building on land that has previous had a public house basement level storage. The height of the building and limited basement level will not require significant foundations (especially given the context of the surrounding buildings height and mass) and little impact if any is expected in relation slope instability and subterranean (groundwater) flow.

This requirement does not yet form part of Camden's Local Area Requirements and we ask that in this case, giving consideration to the specific circumstances, the requirement for this additional survey be removed altogether. We have, as requested, provided below overleaf to the questions taken from page 29 of Appendix E of Arups Report "Camden geological, hydro geological and hydrological study, guidance for subterranean development" as a starting point and to enable the application to be validated.

It should be noted that the footprint of the subject land is flat and that Warner Yard to the East of the site naturally drops in gradient. The rear of the site is some 1.9m higher than the Warner Yard ground level meaning that the basement level will be far less intrusive (please see sketch attached for ground levels of Warner Yard).

Arups Report – Appendix E	
Surface flow and flooding screening flowchart	
1. Is the site within the catchment of the pond chains on Hampstead Heath	No
2. As part of the proposed site drainage, will surface water flows (e.g. volume of rainfall and peak run-off) be materially changed from the existing route?	No
3. Will the proposed basement development result in a change in the proportion of hard surfaced / paved external areas?	No
4. Will the proposed basement result in changes to the profile of the inflows (instantaneous and long-term) of surface water being received by adjacent properties or downstream watercourses?	No
5. Will the proposed basement result in changes to the quality of surface water being received by adjacent properties or downstream watercourses?	No
6. Is the site in an area known to be at risk from surface water flooding, such as South Hampstead, West Hampstead, Gospel Oak and King's Cross, or is it at risk from flooding, for example because the proposed basement is below the static water level of a nearby surface water feature?	No (Information supplied by Environment Agency)
Subterranean (groundwater) flow screening flowchart	
1a. Is the site located directly above an aquifer?	The site is located on land designated as a 'Secondary A Aquifer' according to Figure 8 of the Arup Report.
1b. Will the proposed basement extend beneath the water table surface?	The site previously housed a public house with a basement. The proposed basement is limited in terms of both extent and depth which can be seen from the plans. In the context of the previous basement level and the mass / height of surrounding buildings it is considered very unlikely that the basement will extend beneath the water table surface.
2. Is the site within 100m of a watercourse, well (used/disused) or potential spring line?	Yes. The River Fleet is understood to run below Warner Street (it is understood that the River Fleet is at least 13 feet below the surface).
3. Is the site within the catchment of the pond chains on Hampstead Heath?	No
4. Will the proposed basement development result in a change in the proportion of hard surfaced / paved areas?	No

5. As part of the site drainage, will more surface water (e.g. rainfall and run-off) than at present be discharged to the ground (e.g. via soakaways and/or SUDS)?	No. The addition of sedum roofs and the grassed courtyard area together with a sunken water butt with reduce water discharged to the ground.
6. Is the lowest point of the proposed excavation (allowing for any drainage and foundation space under the basement floor) close to, or lower than, the mean water level in any local pond (not just the pond chains on Hampstead Heath) or spring line.	Almost certainly not but we cannot categorically confirm this at this time.
Slope Stability Screening Flowchart	
1. Does the existing site include slopes, natural or manmade, greater than 7o? (approximately 1 in 8)	No
2. Will the proposed re-profiling of landscaping at site change slopes at the property boundary to more than 7o? (approximately 1 in 8)	No
3. Does the development neighbour land, including railway cuttings and the like, with a slope greater than 7o? (approximately 1 in 8)	No
4. Is the site within a wider hillside setting in which the general slope is greater than 7o? (approximately 1 in 8)	No
5. Is the London Clay the shallowest strata at the site?	The solid geology of the site is shown by the Institute of Geological Sciences (IGS 1979) as London Clay deposits forming the London Basin.
6. Will any tree/s be felled as part of the proposed development and/or are any works proposed within any tree protection zones where trees are to be retained? (Note that consent is required from LB Camden to undertake work to any tree/s protected by a Tree Protection Order or to tree/s in a Conservation Area if the tree is over certain dimensions).	No
7. Is there a history of seasonal shrink-swell subsidence in the local area, and/or evidence of such effects at the site?	No
8. Is the site within 100m of a watercourse or a potential spring line?	Yes. The River Fleet is understood to run below Warner Street (it is understood that the River Fleet is at least 13 feet below the surface).
9. Is the site within an area of previously worked ground?	No
10. Is the site within an aquifer? If so, will the proposed basement extend beneath the water table such that dewatering may be required during construction?	The site is located on land designated as a 'Secondary A Aquifer' according to Figure 8 of the Arup Report. No dewatering is planned.
11. Is the site within 50m of the Hampstead Heath ponds?	No
12. Is the site within 5m of a highway or pedestrian right of way?	Yes



13. Will the proposed basement significantly increase the differential depth of foundations relative to neighbouring properties?	No
14. Is the site over (or within the exclusion zone of) any tunnels, e.g. railway lines?	No

If you require any further information please do not hesitate to contact me directly and we look forward to hearing from you in due course.

Given the length of time it has taken to reach this point I trust every effort will be made to validate this application as a matter of utmost priority.

Kind regards

A handwritten signature in blue ink, appearing to be "O. Thorne", written in a cursive style.

Oliver Thorne BA MRICS
Director, Thorne Hiley Limited