

**morganharrisarchitects**

The Studio  
12a May Road  
Twickenham  
TW2 6QP

T: 020 3015 1147

F: 08719 184 469

E: [studio@morganharrisarchitects.com](mailto:studio@morganharrisarchitects.com)

W: [www.morganharrisarchitects.com](http://www.morganharrisarchitects.com)

PROJECT NO: **AG150d**

**6 & 7 Railey Mews**

18.04.2011

Development Control  
London Borough of Camden  
Town Hall  
Argyle Street  
London  
WC1H 8ND

REF: **PP-01459938**

Via E-mail

**DESIGN & ACCESS STATEMENT**

13 Pages Inclusive

Dear Sir/Madam,

**RE: Mansard Roof Extension to 6 & 7 Railey Mews, Formation of Lower Ground Floor to 6 & 7 Railey Mews, Facade Alterations to 6 & 7 Railey Mews.**

**Consideration to be given to approved proposals as listed below:**

6 Railey Mews:

**2010/2249/P**

Approval for Change of use from abandoned building to C3 Dwelling

**2011/0557/P**

Erection of mansard roof extension to abandoned mews building and insertion of new windows and doors to street facing façade.

7 Railey Mews:

**2009/5396/P**

Approval of Certificate of Lawfulness for continued use as C3 Dwelling

**2011/0564/P**

Erection of mansard roof extension to existing dwelling house (Class C3)

**2011/0760/P**

Excavation of basement to provide additional accommodation for single dwellinghouse (Class C3).

Continued on Page 2...

**Reason for Application and for Supporting Application:**

Considering the approvals noted above we ask that it is taken into account that this planning application seeks the approval to form a Lower Ground Floor at 6 Railey Mews. An application for a Certificate of Lawful Use has been approved for a similar Lower Ground Floor at 7 Railey Mews. The only reason that the same application was not approved for 6 Railey Mews was that the property had not been made habitable since approval of the change of use application listed above. This anomaly means that our client will need to either instate temporary works to make 6 Railey Mews habitable and only then undertake Permitted Development works to form Lower Ground or build out approvals in one phase of works and then undertake formation of Lower Ground Floor within Permitted Development parameters. To be forced to construct the first phase of works to 6 Railey Mews at the same time as formation of Lower Ground Floor to 7 Railey Mews would mean two project phases and an increase to disturbance to neighbouring home owners.

We sincerely request that neighbouring owners and local residents support this application for the following reasons:

1. If the application is refused works to No.7 Railey Mews shall start on site with Lower Ground and further approved works included. No.6 Railey Mews shall be built out with all works approved to date. Once the first phase of works had been completed our client would then be able to build out the Lower Ground Floor of 6 Railey Mews, though this would require underpinning of works built to 6 Railey Mews. Underpinning existing structure is messier and noisier work than forming a Lower Ground Floor from above and would also require additional time on site with a second phase of works required. There is no way of avoiding the formation of the Lower Ground Floor going ahead, but by supporting this application you shall be ensuring that all works are carried out in one compact phase.
2. The above situation would also result in additional costs to our client which would directly impact on his daughter who shall be occupying No.6 Railey Mews. Our client's son, wife and baby will be moving in to No.7 Railey Mews once works are complete. The project is not a development and the people submitting this application shall be your neighbours for many years to come. The Lower Ground Floor is required to enable adequate living space within these properties that are at the pinch point of Railey Mews and much shallower in depth than most other properties on Railey Mews. The overall completed internal floor space shall only be in the region of a modest 60m<sup>2</sup> – not a large size for a two bedroom property, especially when considering the stair and landing take up considerable room.
3. Should this application be approved our client shall build out 7 Railey Mews as per this application rather than following the previous approval under Permitted Development that allowed for an over half a metre of excavation in addition to that shown within this proposal. By supporting this application and having the application approved a lot of site disturbance and noise would be avoided.

**We note again that there is no way of avoiding the formation of the Lower Ground Floor going ahead (eventually), but by supporting this application you shall be ensuring that all works are carried out in one compact phase. By supporting this application and aiding it's approval you shall also be avoiding costing our client additional funds and delay as well as preventing the end users being able to take possession of their homes and become your neighbours – we are sure that this would be much appreciated.**

**Should you have any questions or concerns please do contact Morgan Harris Architects Ltd at your convenience and ask to speak with Guy Morgan-Harris.**

Continued on Page 3...

## **Design & Access Statement:**

Please find below Design and Access statement written in line with CABE guide 'Design and Access Statements.'

### **DESIGN**

#### **Use:**

What Buildings and Spaces will be used for.

Each single family dwelling (as recently approved) shall continue to be used as a single family dwelling. The extension shall provide a Second Bedroom and Shower Room for each property.

#### **Amount:**

How much would be built on the site.

#### 6 Railey Mews:

13.53m<sup>2</sup> within Mansard Roof extension (including stair and landing).

17.77m<sup>2</sup> within Lower Ground Floor extension (including stair and landing).

#### 7 Railey Mews:

12.93m<sup>2</sup> within Mansard Roof extension (including stair and landing).

17.06m<sup>2</sup> within Lower Ground Floor extension (including stair and landing).

#### **Layout:**

How the buildings and public and private spaces will be arranged on the site, and the relationship between them and the buildings and spaces around the site.

The general massing of the properties on site shall be retained. Party Wall between 5 & 6 Railey Mews shall be raised to accommodate the mansard roof construction. A new wall with decorative chimney stack is proposed between 7 & 8 Railey Mews to provide a break between the properties and accommodate the mansard roof structure. We have reviewed the junction between 8 Railey Mews and 9 Railey Mews and have used this recently approved example as precedent to work from. The Lower Ground Floor proposed to 6 & 7 Railey Mews would provide a Living Room to each property. This would not impact on adjacent properties or the local area.

#### **Scale:**

How big the buildings and spaces would be (their height, width and length).

The existing external envelope shall not be changed with exception of height which shall see ridge line increased from 6.5 to 7.9 metres. However, the street facing parapet shall be retained at existing height for 7 Railey Mews and raised to match for 6 Railey Mews (raised by 290mm to front facade and 240mm to rear facade). The Lower Ground Floor will be excavated to provide internal floor to ceiling of 2600mm.

#### **Landscaping:**

How open spaces will be treated to enhance and protect the character of a place.

There is no landscaping relevant to this project.

#### **Appearance:**

What the buildings and spaces will look like, for example, building materials and architectural details.

Building materials shall all match existing in terms of stock bricks, timber framed sash windows and natural slate roofing. The solar reflective coated bituminous roof to top of mansard shall not be visible from the street.

### **ACCESS**

#### **Vehicular and transport links.**

Vehicular and transport links are not impacted in any way.

**Inclusive access.**

We note that the property is accessed by a step from the street and already houses internal stairs that are not able to provide inclusive access. As such the extension does not detract nor enhance existing condition.

Continued on Page 5...

## **Addressing Policy:**

We have addressed relevant sections of Camden's policy below with particular regard for the Lower Ground Floor of 6 Railey Mews which is the only part of the proposal as yet without currently valid permission already granted.

Extracts below from:

### **“Shaping Camden New Basement Development and Extensions to Existing Basement Accommodation Guidance Note”**

**mha responses in light blue.**

#### **PLANNING & DESIGN CONSIDERATIONS**

15 The Council recognises that there can be benefits from basement development, but is concerned to ensure that such development does not harm the recognised architectural character of buildings and surrounding areas, including gardens and nearby trees, and that conservation area character is preserved or enhanced; that the biodiversity value of the site is conserved; that there is no detriment to the water environment; that there is no undue harm to the amenity of neighbouring properties; and that sustainable development is achieved.

*We note that the development does not harm the recognised architectural character of buildings and surrounding areas as it is wholly contained within the footprint of the existing property without external light wells. Gardens and trees and nearby properties should not be negatively impacted by proposals.*

#### **Size of development**

16 Often with basement development, the only visual manifestations are light wells and skylights, with the bulk of the development concealed wholly underground and away from any public view. However, just as overly large extensions above the ground level can dominate a building, contributing to the over-development of a site, an extension below ground can be of an inappropriate scale. There may be more flexibility with the scale of a development when it is proposed underground, but there are a number of factors that would mean basement development would be over-development.

17 These include, for example, harm caused to any trees on or adjoining the site, where the development would restrict future planting and mature development of trees typical to the area, if the basement development would remove more than 50% of the amenity space (garden or front court yard), and any impact to the water environment. The permissible size of a basement development will therefore be guided by the characteristics of the site.

*We note that the proposal should not cause harm to any nearby trees. We further note that no amenity space is lost due to the proposed works.*

18 A basement development that is modest in size such that it does not extend beyond the footprint of the original building and is no deeper than one full storey below ground level (approximately 3 metres in depth) is often the most appropriate way to extend a building below ground, provided that the internal environment is fit for the intended purpose (See Residential Development Standards below), and there is no impact to any trees on or adjoining the site, or to the water environment.

*We note that the proposal sits within the existing footprint of 6 & 7 Railey Mews and is only one storey below ground level creating an internal floor to ceiling height of 2600mm with an external depth less than 4000mm. We further note that a previous approval for No.7 Railey Mews exists for a Lower Ground Floor that would exceed 4000mm by over 500mm but that should this application be approved the proposal would be built out to this design (less disturbance to neighbours).*

#### **Accommodation standards and amenity for future occupiers**

34 All rooms within a basement should be able to function for the purpose of which they are intended. They should have an adequate size, shape, door arrangement, height, insulation from noise and vibration, and access to natural lighting and ventilation.

*We note that Lower Ground Floor Living Room (as proposed) will be able to function for that purpose. Size, shape, door arrangement, height, insulation from noise and vibration are all suitable.*

35 Camden's Planning Guidance (Section 40 – Residential development standards) requires all habitable rooms within basement accommodation to have a minimum headroom of 2.3 metres. The exception to this will be existing basements which may have a head room of 2.1 metres.

We note that Lower Ground Floor Living Room (as proposed) will have a floor to ceiling height of 2600mm increasing to 7100mm where a void is to be instated between Ground and Lower Ground Floors.

36 To ensure that adequate natural light is provided to habitable rooms, walls or structures should not obstruct windows by being closer than 3 metres. Where this is not achievable it is advised that the glazed area should total not less than 10% of the floor area of the room. Glazing permitted within this calculation is that which is above the point from where a line can be drawn upwards at a vertical angle of 30 degrees with the horizontal to pass the top of the obstruction.

We note that these requirements are met by the proposal.

37 Forecourt parking can also restrict light to basements, and consideration should be given to any further obstruction from vehicles parked on the forecourt that may present a barrier to light serving basement windows.

There is no forecourt parking proposed.

38 To ensure that adequate ventilation is provided it is advised that half the minimum glazed area (minimum 5% of floor area) should be openable, with the top of the opening at least 1.75m above the floor level. Alternative ventilation is needed where this minimum ventilation area is not provided, or if the use requires more provision. However, passive ventilation should be achieved where possible and mechanically assisted ventilation should be silent in operation.

We note that these requirements are met by the proposal.

#### **Means of escape**

39 Basements should be provided with either a door or suitably sized window allowing access to a place of safety that provides access to the external ground level, or with a protected escape route within the building leading to a final exit at ground level. Stairs, ladders, gates in any railings around a light well that are required for means of escape should be designed to be as discreet as possible and should have regard to the character of the building and surrounding area.

We note that these requirements are met by the proposal.

#### **Amenity for neighbours**

##### **Impacts to neighbours from demolition and construction**

40 Some of the worst problems affecting amenity are experienced during the demolition and construction phases of a development, and particularly so for basement development. Although this is temporary, it tends to create noise, vibration, dust, air and light pollution, and last lengthy periods of time.

41 Full care and consideration should be given to neighbouring properties, as the works can be particularly intrusive to immediate neighbours. All construction and demolition processes are expected to be in accordance with the Considerate Constructors Scheme standards. Construction and demolition processes are also expected to conform to the Demolition Protocol (see the Council website [www.camden.gov.uk](http://www.camden.gov.uk)).

We understand that our client shall adhere to these requirements.

42 The Council seeks construction management plans to accompany all planning applications for basement development, and these should include provisions for phasing, sequential development, management of waste, noise and access during construction. In considering these applications, the Council will refuse permission for such plans which do not minimise the harmful impacts of construction on the building(s) and on local amenities.

We note that the proposal is not within a Conservation Area and do not have impact on a Listed Building. As such we understand that a Construction Management Plan is not required.

Our client will be able to provide this information should this be required. It is preferred that should this be required that it should be as a condition of an approval that requires signing off prior to commencement of works rather than as a requirement during the application process.

##### **Impacts to neighbours from light pollution**

43 Where light wells or skylights are proposed and these have a direct interface with an adjoining neighbouring property, there is the potential for light spill from internal illumination. Light from internal sources should not cause light spill or disturbance to neighbouring properties.

We note that there are no external light wells proposed.

#### **PROTECTING THE BUILT AND NATURAL ENVIRONMENT**

##### **Structural stability**

44 The Council will expect all basement development applications to provide evidence that the structural stability of adjoining or adjacent buildings is not put at risk. In order to validate applications for listed buildings the Council will usually require a report prepared in a specific form by a structural engineering firm that is fully accredited by the main professional institute(s) (see para 61) and therefore whose advice we would accept as independent. As a regulatory

authority the Council cannot require or recommend that the report is prepared by a specific firm.

We note that evidence of structural stability shall be required during the Full Plans Building Control Application process and during the Party Wall Award process. Should Camden require this information during the application process we request that this does not hold up validation and that a condition is attached that requires structural calculations and information to be signed off by Camden prior to works commencing. We note that we shall be submitting a Full Plans Building Control Application shortly which shall include structural design and calculations from an independent and suitably qualified consulting structural engineer.

#### **Ground water**

- 45 Basement development may affect groundwater flows, and even though the displaced water will find a new course around the area of obstruction this may have other consequences for nearby buildings, trees, etc. Emerging evidence shows that even where there are a number of consecutively constructed basement developments, the groundwater flows will find a new path. Given the nature of the ground in many higher parts of the borough, basement development may have the potential to cause harm through the diversion of ground water. The Council may therefore require a Hydrology Report to be submitted with proposals. This report should be prepared by a structural engineering or hydrology firm that is fully accredited by the main professional institute(s) and therefore whose advice we would accept as independent. UDP policy SD9(b) contains further guidance on this issue.

Should Camden require this information we shall ensure that this is provided within a reasonable timescale by a suitably qualified specialist firm. It would be preferred to have this information required as a condition of an approval that requires signing off prior to works commencing rather than delaying the application process and/or validation itself.

#### **Sites of archaeological importance**

- 46 There are parts of the borough in which there is considerable likelihood that archaeological remains will be found, and these are listed in Appendix 2 – Archaeological Priority Areas. However, there have also been individual finds in other parts of the Borough, and no location can be completely ruled out. The Council will consult with and be guided by English Heritage on the archaeological implications of development proposals especially within the archaeological priority areas and for sites of archaeological potential. Further guidance of requirements for development within the archaeological priority area and for sites of archaeological potential can be found in the accompanying text to Policy B8 in the UDP, which available to view on the Council website at [www.camden.gov.uk](http://www.camden.gov.uk).

We note that the site is not listed within Appendix 2.

#### **Landscape and biodiversity**

- 47 Proposals for basement development that take up the whole front and / or rear garden of a property are very unlikely to be acceptable. Sufficient margins should be left between the site boundaries and any basement construction to enable natural processes to occur and for vegetation to grow naturally, and usually wide enough sustain the growth and mature development of the characteristic tree species of the area. The Council will seek to ensure that gardens maintain their biodiversity function for flora and fauna and that they are capable of continuing to contribute to the landscape character of an area so that this can be preserved and enhanced.

We note that these requirements are met by the proposal.

- 48 The basement development should provide an appropriate proportion of planted material to mitigate the reduction in the natural storm water infiltration capacity of the site and / or the loss of biodiversity caused by the development. This will usually take the place of a green roof or detention pond on the top of the underground structure. It will be expected that a minimum of 0.5 metres of soil be provided above basement development that extends beyond the footprint of the building, to enable garden planting. The use of sustainable urban drainage systems (SUDS) are sought in all basement developments that extend beyond the profile of the original building. For basement development that consumes more than 50% of the garden space, and is considered otherwise to be acceptable, the use of SUDS will be required to mitigate any harm to the water environment. (For further guidance on SUDS, see Section 51 of the CPG, at [www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)).

We note that a green roof would not be suitable as the basement to be formed is to be within the footprint of the existing property.

#### **Trees**

- 49 When designing underground structures, trees on or adjacent to the site must be given full consideration, including street trees and the required root protection zones of these trees (further information on the protection of existing trees is included in paragraph 23.4 to 23.10 of

the CPG). Where there are trees on or adjacent to the site, including any street trees, an arboricultural report will be required with the submission of a planning application. This should set out the measures to be adopted during construction works to protect any trees on or adjoining the site, and the justification for removing any trees. Further guidance is provided in BS5837:2005 'A guide for trees in relation to construction', or by contacting the Council's Tree Officer on 020 7974 5616.

We understand that there are no significant trees that would require such information.

#### **Areas of flood risk**

50 While nowhere in the borough is identified by the Environment Agency as being flood prone, there are still parts that are identified as being subject to localised flooding from surface water which cannot be discharged within the drainage/sewer network.

We understand that this property is not located within an area identified as being subject to localised flooding from surface water which cannot be discharged within the drainage/sewer network.

51 Historical research shows that the topography of Hampstead and the nature of the summer thunderstorms make high rainfall levels and flooding events a recurring feature in Camden. Notable floods occurred in 1975 and 2002, and data collected afterwards show areas of the borough that are more susceptible to surface water flooding.

We understand that this property is not located within an area identified as being subject to localised flooding from surface water.

52 The Council is also currently undertaking a Strategic Flood Risk Assessment and preliminary evidence suggests that areas of West Hampstead, Cricklewood and South Hampstead are at a higher risk of surface water floods. The specific streets are attached at Appendix 3 and are broken down into 'primary areas' (those that have been affected by both major floods in 1975 and 2002) and 'secondary areas' (those that have been affected by one of the major floods).

We note that Railey Mews is not listed within Appendix 3.

53 Planning Policy Statement 25 'Development and Flood Risk' (PPS25) notes that landowners are responsible for safeguarding their land and other property against natural hazards such as flooding, and allows for Local Planning Authorities to request a Flood Risk Assessment (FRA) to be carried out in areas of identified flood risk in order to ensure that all new development in flood risk areas is appropriately flood resilient and resistant, including safe access and escape routes and any residual risk can be safely managed. Accordingly, all applications within streets identified as either 'primary' or 'secondary' locations in Appendix 3 will be expected to submit a FRA at a later stage for any application for a basement extension in line with the criteria set out in PPS25, which can be seen at:

[www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement25](http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement25)

We note that Railey Mews is not listed within Appendix 3. As such an FRA is not required.

#### **Sustainable construction**

54 UDP policies expect developments to be sustainable by making efficient use of resources and state that the Council will consider the quality and appropriateness of materials used, and energy and resources conserved through the use of recycled and renewable building materials, especially on-site re-use and recycling of construction waste, provided that the impact from noise, dust and transport are minimised.

It is proposed that as much material on site shall be re-used as possible. This should see all brickwork from site retained and re-used and existing concrete crushed and re-used as hardcore/aggregate on site.

55 CPG also provides general guidance on sustainable construction issues (sections 11 – Construction and waste, 17 - Energy and on-site renewables, and, 27 – Materials and resources). As part of an application for a basement development, applicants will be required to describe within their Design and Access Statement how the development has considered materials, resources and energy. This statement should explain the opportunities for sustainable materials selection and sourcing that have been considered and applied in the proposal, and the reasons for the sourcing choices that are made. The statement should also detail which existing materials on the site are to be re-used as part of the development or made available for re-use elsewhere, and the measures to improve the energy efficiency of the development.

We note that materials proposed have been listed within the Planning Application Forms. We further note that the proposal shall meet current Building Regulations and as such will represent a massive improvement on existing condition.

56 Some proposals for basement development will be required to adopt sustainable design and construction measures and applicants will therefore be required to address the efficiency of proposed lighting and ventilation systems.



We understand that these measures shall not be specifically required at this stage of the application. However, the proposal shall be suitably insulated to exceed current Building Regulations and shall make use of energy efficient measures where available such as use of energy saving light bulbs, energy efficient A-Rated appliances and well specified insulation and heat source.

**SUMMARY OF POSSIBLE INFORMATION REQUIRED TO BE SUBMITTED WITH BASEMENT APPLICATIONS**

The following information may be required with applications for basement development:

**Construction Management Plan (see paragraph 22)**

Where basement works are proposed in conservation areas or adjacent to a listed building, the Council will seek the submission of a management plan for demolition and / or construction. The Council may also require this in other areas depending on the scale of the development / site conditions of the particular area, etc.

We note that the proposal is not within a Conservation Area and do not have impact on a Listed Building. As such we understand that a Construction Management Plan is not required.

**Structural Stability Report (see paragraph 44)**

The Council may require basement applications to be supported by a Structural Stability report, prepared by an "approved" structural engineering firm or hydrology expert. The submission of a Structural Stability Report will be a requirement for Listed Building applications.

We note that the proposal does not have impact on a Listed Building. If a report is required this can be made forthcoming though we request that the application is validated with this information to follow or for this information to be required as a condition to approval.

**Design and Access Statement (see paragraph 55)**

Some applicants will be required to describe within their Design and Access Statement how the development has considered materials, resources and energy. This statement should provide an explanation of the opportunities for sustainable materials selection and sourcing that have been considered in the proposal, and the reasons for the sourcing choices that are made.

We have not been made aware that this information is to be required or not. Due to the small scale of the proposal we understand that meeting current Building Regulations should be sufficient.

**Code for Sustainable Homes Assessment (see paragraph 56)**

Any proposals for basement development are expected to provide sustainability measures, however schemes proposing greater more than 5 units are required to adopt sustainable design and construction measures in-line with section 44 of the CPG.

Due to the small scale of the proposal we understand that meeting current Building Regulations should be sufficient.

**Arboricultural Report (see paragraph 49)**

Where there are trees on or adjacent to the site, including any street trees, an arboricultural report will be required with the submission of a planning application. This should provide a statement in relation to the measures to be adopted during construction works to protect any trees on or adjoining the site and justification for any trees to be felled.

We understand that this shall not be required as the proposal does not involve the felling of trees nor impact on trees nearby.

**Flood Risk Assessment (see paragraph 50)**

Applications within streets identified as either 'primary' or 'secondary' locations in Appendix 3 may be expected to submit a Flood Risk Assessment with applications for a basement extension.

We understand that this property is not located within an area identified as being subject to localised flooding from surface water which cannot be discharged within the drainage/sewer network. Railey Mews is not listed within Appendix 3.

**Appendix 6: Relevant UDP planning policies – mha responses in light blue.**

S1:	Seeks to ensure that all development is sustainable
	The development will be suitably sustainable.
S2:	Seeks to ensure that development promotes high quality of life for all, contributes to sustainable land use and does not harm local amenity.
	The inclusion of Lower Ground Floor to 6 Railey Mews will enable the property to provide a high quality of life for all. The proposal makes the most of the existing land to provide a simple two

	bedroom family home with sufficient living space.
S3:	Seeks to ensure that development adequately considers resources, energy, waste and minerals, minimises their impacts, and protects the environment and people from hazards.
	The development adequately considers resources, energy, waste materials and whilst works are carried out we understand that our client shall ensure that the environment and people within the environment around the property are protected from hazards.
S7:	Seeks to protect and enhance the Borough's historic environment and ensure that all development is designed to the highest standard and protects and enhances its surroundings.
	We believe strongly that the proposed modifications to 6 & 7 Railey Mews will protect and enhance not only 6 & 7 Railey Mews but the setting within which they reside. The design has been undertaken with great care and consideration to the local environment.
S8:	Seeks to protect and enhance the Borough's open space and conserve and enhance the Borough's biodiversity.
	As all works are being undertaken within the footprint of the existing properties and the properties have no garden we do not believe that this statement is relevant to the proposals.
SD1:	Requires development to foster sustainable communities; promote the regeneration of areas; to meet the highest standards of access and inclusion; and, incorporate design, layout and access measures which address personal safety.
	The proposed development of 6 & 7 Railey Mews will bring a derelict and unoccupied section of Railey Mews back into usage for the first time in some years. By allowing accommodation within these properties for a family dwelling we shall be reinforcing the local community and ensuring the future use of Railey Mews.
SD4:	Requires development that makes full use of the potential of a site.
	We believe that full use has been made of the site but note that the site has not been over-developed. The final properties shall only be 2 bedroom Mews Houses and nothing greater. We further note that most other properties on Railey Mews enjoy much greater depth of property behind facade; 6 & 7 are located at the 'pinch point' of Railey Mews and are unique on their lack of depth.
SD6:	Protects amenity of occupiers and neighbours.
	The development protects the amenity of neighbours and shall greatly improve the amenity of the occupiers.
SD7A:	Protects amenity from light pollution.
	There are no light wells proposed and as such there shall be no increase to light pollution from the development other than the additional windows to the mansard roof which are opaque glazed.
SD8B:	Seeks to minimise the impact on local amenity from the demolition and construction phases of development.
	We note that should this application be approved all construction works can be carried out in one single phase. If this application is refused our client will need to build out 6 Railey Mews as approved prior to then excavating for the Lower Ground Floor. This would create further disruption for neighbouring owners and delay in providing further residential units within the borough.
SD9B:	Seeks to protect the water environment, water quality or drainage systems and prevent or mitigate flooding.
	We understand that the proposal shall not impact on the water environment, water quality or drainage systems and shall not have negative impact regarding flooding.
SD9C:	Seeks to conserve energy and resources
	Where possible existing materials shall be re-used on site and new materials sourced ethically.
SD10B:	Seeks to ensure development on sites of contaminated land have identified and proposed remedial measures to prevent contamination.
	We understand from our client that the site is not contaminated.
SD10C:	Seeks to ensure development in locations of geological instability can overcome potential instability.
	The above is not applicable to this application as we understand.
SD12A:	Requires development to make adequate provision for the sorting and storage of waste materials.
	Waste storage shall be provided within the kitchens of 6 & 7 Railey Mews subject to approval of this application.
B1:	Seeks development that is designed to a high standard.
	We believe that the proposals for 6 & 7 Railey Mews have been carefully and considerably designed to a high standard.

B3:	Requires development to enhance the architectural character of the existing building, and established character of the surrounding area.
	The development will enhance the architectural character of the existing building and work with the established character of the surrounding area.
B6:	Seeks to preserve or enhance the character of, and not cause harm to the setting of listed buildings.
	The proposed development does not impact on any listed buildings nor their settings.
B7:	Seeks to preserve or enhance the special character or appearance of a conservation area.
	The proposed development does not impact on the special character and appearance of any Conservation Areas.
B8:	Seeks to preserve remains of archaeological importance.
	We do not believe that the above statement is applicable to the proposed development.
N5:	Seeks development that conserves or enhances biodiversity.
	We do not believe that the above statement is applicable to the proposed development considering that this property has no garden.
N7:	Requires development to protect species and their habitats.
	We do not believe that the above statement is applicable to the proposed development considering that this property has no garden.
N8:	Seeks to protect trees within the Borough.
	We do not believe that the above statement is applicable to the proposed development considering that this property has no garden. Any impact on trees to adjoining properties shall be correctly assessed by Structural Engineers and addressed and resolved in full during the course of detailed structural design by a qualified structural engineer.

Continued on Page 12...

**Photographs:**



6 & 7 Railey Mews with 6 to the left and 7 on the right.



6 & 7 Railey Mews looking up past 8 Railey Mews to mansard roofing to 9, 10 and 11 Railey Mews which set precedent for this proposal.

Continued on Page 13...



11, 10 and 9 Railey Mews looking back towards 7 & 6 Railey Mews. Note precedent set by mansard roofing to 11, 10 and 9 Railey Mews.

Generally we note that the proposal greatly adds to the usability of each property and allows a family to take occupation once works are completed.

If you have any questions, require any further information, or would like to arrange a site visit/meeting please don't hesitate to contact **mha** at your convenience.

Yours sincerely,  
For, and on behalf of **morganharrisarchitects**.

Guy Morgan-Harris  
BA(Hons) Dip Arch RIBA  
Managing Director

m: 07813 810 230  
e: [gmh@morganharrisarchitects.com](mailto:gmh@morganharrisarchitects.com)

**MORGAN-HARRIS ARCHITECTS** Ltd – Registered in England, Company number 5047051  
Registered Address: 42 High Street, Flitwick, Bedfordshire, MK45 1DU