

BY POST & EMAIL

London Borough of Camden
Development Management
2nd Floor
5 Pancras Square
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16th November 2015

Dear Mr Whittingham,

**APPLICATION REF.2015/4501/P – PLANNING APPLICATION
36 – 52 FORTRESS ROAD, FORTRESS GARAGE AND 20 FORTRESS GROVE
ADDITIONAL INFORMATION SUBMISSION**

I write on behalf of our client, The Estate Charity of Eleanor Palmer, to respond to the comments received from the case officer, Gideon Whittingham, on 15th October concerning the above planning application.

We have responded to the comments in turn in the below paragraphs, amended the design accordingly and submitted additional documentation where requested.

Amendments to the Design of the Proposal

Following the comments received on the proposal on 15th October from the planning and conservation and design officer, Michelle O'Doherty, we have made amendments to the scheme. The revisions are detailed in turn in the following paragraphs.

Residential Dwellings

House Type A

The green roofs that were previously proposed to house type A have now been removed along with the maintenance access in response to comments received by neighbouring residents. The low privacy screen remains to ensure that there are adequate measures to prevent overlooking into the neighbouring properties. This is illustrated on Drawing 687-LY-0X01 House Type A Floor Plans Rev A.

A number of horizontal cross members across the trusses have now been removed and reduced in part to un-complicate the facades of the residential dwellings. This is illustrated on Drawing 687-ES-0X03 Sections as Proposed (1of2) Rev A and Drawing 687-ES-0X04 Sections as Proposed (2of2) Rev A.

These will be constructed from steel and will be articulated in the same way as the pitched members. It should be noted that a number of horizontal cross members are required for structural engineering.



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House Type C

The design of House C type proposed along Railey Mews has been reviewed and the existing building and window are to be retained in their entirety with only the old garage door replaced with new infill construction including a timber door and an additional double glazed dark grey metal framed window. In addition the bin and cycle store has been extended to the rear of the property. These design amendments are illustrated on Drawing 687-LY-0X03 Rev C. There is now no proposed access to the commercial building from Railey Mews, again to meet some neighbouring amenity concerns.

Commercial Building

In response to the officers comments on the design of the commercial building, the following amendments have been made to the drawings, these include:

1. The height of the commercial building has been reduced to a minimum. It is now much lower than the factory gable and is a much smaller mass in relation to the retained industrial buildings over which it sits. This is illustrated on Drawing 687-ES-0X02 Elevations as Proposed Rev B 'Commercial Courtyard'.
2. The roof has also been cut back on plan from the front of the site and significantly at the rear of the site. This has reduced its dominance and will allow much more of the retained gable to be visible. In addition, obscure glass is proposed at level 2 and the proposed green roofs will not be accessible. The design revision will also reduce the impact of this building on the neighbouring properties. These amendments are detailed on Drawing 687-LY-0X05 Commercial Floor Plans as proposed Rev C and Drawing 687-ES-0X04 Sections as Proposed (2of2) Rev A.
3. The proposed bin store and cycle store have also increased in size and further details are now shown on the plans. The bin store is now 30.3 sq m and can accommodate 13 eurobins and the cycle store has been increased to 26.9 sq m and can accommodate 22 bicycles. Access to these areas remains as existing and is detailed on Drawing 687-LY-0X04 Commercial Floor Plans as Proposed Rev C.
4. The roof form has been simplified and is now detached from the surround walls to reinforce the concept of inhabiting the old buildings.

The revisions to the design ensure that the proposed development will integrate with the surroundings through the retention of the Railey Mews façade and the streetscape. The revisions to the design ensure that the proposal preserves the character and appearance of the Kentish Town Conservation Area, and the positive contributors in the CA.

Materials

In response to the further requested information, details of the proposed materials including; cladding and metals are provided on Drawing ES-OX-01. In addition, details of maintenance and weathering are provided in the supporting Design and Access Statement (July 2015). It should be noted that there is a limited palette of

materials proposed, none of which are intended to out of character with the area and could be dealt with by condition.

Amenity

We note that you have not yet commented on the impact of the proposed scheme on the amenity of the surrounding properties. However, the proposals have been amended to respond to the comments received from the neighbouring residents. Amendments include:

1. The commercial roof has been reduced in size and form and this has resulted in a greater distance between the proposed commercial roof and the existing residents as shown on Drawing 687-ES-0X03 Sections as Proposed (1of2) Rev A and Drawing 687-ES-0X04 Sections as Proposed (2of2) Rev A.
2. Removal of green roofs to the rear part of the residential dwellings adjacent to Railey Mews and the replacement with pitched roofs.
3. Removal of the openable access window and maintenance door to the green roofs to ensure that they are not used for recreational purposes.
4. All windows to the rear elevation of the new residential dwellings adjacent to Railey Mews to not be openable and obscured.

In addition to the above, the planning statement produced by CgMs and submitted as part of the planning application assesses the proposals impact on the adjacent residents This includes; visual privacy and overlooking, overshadowing and outlook and sunlight, daylight and artificial light levels. This is in accordance with policy 3.5 of the London Plan and Camden's Policy CPG 1 and CPG 8 and Development Management Policy DP 26.

Mix of Proposed Uses

The comments received on 15th October deem the re-provision of flexible commercial workspace, suitable for light industrial use for the use by small businesses as acceptable.

Due to amendments to the proposal including the amendments to the form of the commercial unit, the total proposed commercial workspace has been reduced slightly from 1,138 sqm to 1,102 sq m.

Notwithstanding the above position which has been acceptable by the officer, due to the amendments the scheme proposes 1,102 sq m of flexible commercial floor space over 3 levels. As detailed within the supporting Planning Statement produced by CgMs submitted with the planning application, the replacement commercial floorspace will be suitable for the full range of uses consistent with the Council's employment policies. The space is flexible and can be adapted to meet the needs of prospective occupiers and particularly small and medium sized businesses in accordance with Policy DP13.

Transport and Highways

Cycle Parking

In response to the comments received on 15th October the cycle parking for the residential units has been increased to 16 no. cycle parking spaces. In addition, the cycle parking space design has been amended to be covered and secure. The

revised cycle parking storage for the residential units is shown on drawing 687-ES-0X02 Elevations as Proposed Rev B and Drawing No. 687-LY-0S01 Site Plan as Proposed Rev B.

The cycle parking spaces for the commercial unit has been increased to 22 no. cycle parking spaces. These are located inside the commercial unit as shown on Drawing 687-LY-0X04 Commercial Floor Plans as Proposed (1 of 2) Rev C.

The drawings and sections enclosed provide additional details and the level of cycle parking spaces for both the residential dwellings and commercial unit and are compliant with the London Plan policy 6.3 and Camden's Development Management Policy DP18.

Deliveries and Servicing

As detailed within the supporting Design and Access Statement produced by Cooley Architects submitted with the application, the courtyard adjacent to Fortess Grove is capable of accommodating a small – medium sized motor vehicle for on-site deliveries and servicing.

As suggested, bollards are now proposed to be installed in the courtyard area to prevent off-street car parking. The location and specification of the proposed bollards is detailed on Drawing 687-LY-0S01 Site Plan as Proposed Rev B. This is in accordance with Camden's Development Management Policy DP18.

Construction Management Plan

The Construction Management plan has been amended to include details on Construction vehicle movements. It states that hours in which vehicles will arrive and depart will coincide with site hours are 9.30am to 4.30pm Monday – Friday and 8.00am to 1.00pm on Saturdays.

It should be noted that the contractor has not been appointed for this project as of yet, therefore the submitted pro-forma has been submitted in-line with Camden's minimum requirements. This further additional information sought can be secured by way of condition.

Ecology and Nature

The comments received on 15th October identified the need for an Ecology Walkover and Desktop Assessment as outlined on page 100 of CPG 3 'Sustainability'; however, this did not form a validation requirement for Camden. Due to the nature of the site, Arbtech have produced a Bat Survey and Preliminary Roost Assessment (26th October 2015). An Ecology consultant visited the site on Monday 26th October to undertake an ecological walk over specifically regarding bats. The supporting desktop assessment which is required by CPG3 is enclosed and concludes that the site has a negligible habitat value for species, in particular roosting bats. The consultant has confirmed that no further surveys are required as the species is absent from the premises.

Energy and Sustainability

The Energy Strategy produced by NRG has been reviewed and amended to include additional efficiency measures to further reduce CO2 emissions, this includes 110

PV panels which are proposed on the roofs of the proposed buildings (as shown on Appendix 4 of the supporting Energy Statement produced by NRG), they will be positioned on a 15 degree mounting angle, south facing orientation and have less than 20% over-shadowing. In addition, air source heat pumps are proposed for the heating and cooling of the commercial unit. The proposed development will therefore achieve a 35% reduction in carbon emissions and is compliant with Part L via passive Efficiency Measures as highlighted by section 4 of the supporting Energy Strategy produced by NRG (November 2015). The proposed development therefore meets the criterion set out in Camden's Core Strategy Policy CS13 'tackling climate change through promoting higher environmental standards'.

An additional Sustainability Statement has been produced by NRG to support the proposal. BREEAM "Very Good" is sought and the pre-assessment is detailed at Appendix 1 of the supporting Sustainability Statement. As detailed in the above paragraph PV panels and mechanical ventilation are proposed for the commercial unit which contribute to the proposals score and allow it to achieve BREEAM "very good" and a score of 56%. This is in accordance with Camden's Core Strategy Policy CS13 'tackling climate change through promoting higher environmental standards' and Development Management Policy DM22 'promoting sustainable design and construction'.

Flooding and Sustainable Urban Drainage Systems

In response to the officers' comments, RPS have produced a Surface Water Drainage Statement (November 2015). The supporting statement details that a number of SUDs techniques have been considered and the assessment has identified the potential to incorporate green roofs and permeable paving within the development scheme. The drainage calculations have confirmed that the proposed 247.5 sq m of permeable paving and 330 sq m of green roofs which will provide in excess of 50% reduction in runoff rates. This is in accordance with London Plan Policy 5.13 'Sustainable Drainage', Camden's Core Strategy Policy CS13 'Tackling climate change through promoting higher environmental standards' and Camden's Development Plan Policy DP23 'Water'.

The surface water drainage pro-forma for new developments has also been completed by RPS, this is at Appendix F.

Submitted Documents

As detailed in the above paragraphs revisions have been made to the design proposal in response to the case officers' comments received on 15th October. Please find enclosed the following revised documents:

- Amended application forms;
- Bat Survey- Preliminary Roost Assessment – Arbtech October 2015;
- SUDS Statement – RPS November 2015;
- Revised Construction Management Statement – Cooley Architects October 2015;
- Revised Energy Statement – NRG November 2015;
- Sustainability Statement – NRG Consulting November 2015; and
- Revised Drawings Produced by Cooley Architects (November 2015);
 - o Drawing No. 687-ES-0X01 Elevations (1 of 2) Proposed Rev B
 - o Drawing No. 687 – ES-0X02 Elevations (2 of 2) Proposed Rev B
 - o Drawing No. 687-ES-0X03 Sections (1 of 2) Proposed Rev A

- Drawing No. 687-ES-0X04 Sections (2 of 2) Proposed Rev A
- Drawing No. 687-LY-0R01 Roof Plan as Proposed Rev A
- Drawing No. 687-LY-0S01 Site Plan as Proposed Rev B
- Drawing No. 687-LY-0X01 House Type A Plans Rev A
- Drawing No. 687-LY-0X02 House Type B Plans Proposed
- Drawing No. 687-LY-0X03 House Type C Plans and Elevations Rev C
- Drawing No. 687-LY-0X04 Commercial Plan (1 of 2) Rev C
- Drawing No. 687-LY-0X05 Commercial Plans (2of2) Rev C

Conclusions

The submitted revised drawings and documents have responded comprehensively to the comments raised by both the case officer and design officer received on 15th October. We deem the proposal compliant with both national and local policy and believe the proposal will deliver significant planning benefits for the reasons set out in the CgMs Planning Statement.

If you have any queries please do not hesitate to contact either Bethan Hawkins or me at this office. I look forward to discussing the application with you further and moving towards determination at 17th December Planning Committee.

Yours sincerely,


Matthew Roe
Director