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Dear Ms Phillips

70 Elsworthy Road, NW3 3BP
Reference: 2015/4684/P
Submission of Further Information

Further to earlier email correspondence, on behalf of the applicant we have been collating a response to the range of points that have been put to us by the Council in assessing the current application at 70 Elsworthy Road (Ref: 2015/4684/P).

Specifically, this response addresses the following matters:

- An assessment of potential for biodiversity enhancements;
- Further details with regard to flood risk;
- Further commentary with regard to energy and sustainability measures and enhancements;
- A response to the queries raised by Campbell Reith in their review of the submitted Basement Impact Assessment; and
- A response to comments received from members of the public.

I also summarise the main elements of the response below. However, a number of additional documents offer a much more detailed response to each of these points and should be fully assessed. Please therefore find enclosed the following:

- An Updated Site Investigation & Basement Impact Assessment, prepared by GEA (dated 25 November 2015);
- An Updated Ground Movement Assessment Report, prepared by GEA (dated 25 November 2015);
- An Updated Structural Engineering Report and Subterranean Construction Method Statement, prepared by Elliott Wood (dated November 2015);
- A summary of the responses submitted to address the content of Campbell Reith's independent Basement Impact Assessment Audit;
- An Email dated 5 November 2015 from XC02 Energy, addressing previous comments raised with regard to energy and sustainability matters;
- An Addendum to the previously submitted Sustainability and Energy Statement, prepared by XC02 Energy, setting out the further effects of now proposed a Ground Source Heat Pump System;

- A Preliminary Ecological Appraisal, prepared by XC02 Energy;
- Technical Details of a Proposed Sedum Blanket Green Roof to the proposed dwelling house; and
- Approved drawings relating to developments at 56, 60 and 62 Avenue Road.

In addition, please find enclosed the following updated drawings:

- Proposed Roof Plan, reference: 1422-PL-306 Rev A; and
- Proposed Roof Sedum Build Up, reference: 1422-PL-323.

These drawings reflect proposals to introduce a green roof onto the proposed dwelling house, in order to enhance the contribution of the development to both biodiversity and reducing rainwater run-off and contribution to drainage. Please consider these drawings as superseding their equivalent in the originally submitted drawing pack.

Given the file size of some of these documents, all documents have been provided on a CD.

Response to Comments from Internal Consultations and Independent Assessment

You have provided comments from colleagues within the Council on a number of matters, specifically biodiversity, flood risk energy and sustainability matters.

In addition, the Basement Impact Assessment has been subjected to independent assessment by Campbell Reith on behalf of the Council. In response to some queries raised, both the Basement Impact Assessment and Structural Engineering Report have been updated to clarify each of the points raised.

Subject	Summary of Additional Response	Further Documents
Biodiversity Enhancements	<ul style="list-style-type: none"> - A walkover of the site to assess existing biodiversity has now been undertaken. - Recommendations have been made including provision of a green roof, provision of bat and bird boxes and some specific species for planting 	<ul style="list-style-type: none"> - Preliminary Ecological Appraisal prepared by XC02 - Revised Drawings by Wolff Architects, incorporating proposals for a green roof
Flood Risk	<ul style="list-style-type: none"> - With reference to the specific query raised by your sustainability officer regarding run-off rates, the authors of the previously submitted Drainage / SUDS Assessment, Elliott Wood, have provided the following additional commentary: <i>'Surface water run-off from the site will be restricted to 5l/s for the 100 year + Climate Change event, in line with London Plan requirements. This provides a significant reduction in run-off when compared to the existing site. A green roof will be incorporated as part of the proposed main building, which will</i> 	<ul style="list-style-type: none"> - Flood Risk Assessment prepared by Evans River and Coastal (included as an appendix to the updated Basement Impact Assessment) - Revised Drawings by Wolff Architects, incorporating proposals for a green roof

	<p><i>reduce the rate and volume of surface water entering the onsite drainage network. The green roof will also provide pollution reduction measures and landscape/wildlife benefits.</i></p> <p><i>Due to the size and nature of the site it is not deemed feasible to introduce large scale open water features such as ponds / basins / swales. It is therefore proposed that surface water is attenuated via an appropriate flow control device and below ground attenuation crates. Permeable paving has been proposed for the majority of new hardstanding areas, which will also provide storage for attenuation within sub-base layers. The introduction of permeable paving will also provide further pollution reduction benefits.</i></p> <p><i>It is understood that tanked systems are the least preferred SUDS technique in the London Plan SUDS hierarchy; however the introduction of a green roof and permeable paving provides the water quality and landscape/wildlife benefits associated with the most sustainable techniques. The SUDS techniques proposed are therefore deemed to be suitable for the size and nature of the development.'</i></p> <ul style="list-style-type: none"> - As noted above, a green roof is now proposed to be provided on the main dwelling and amended drawings to reflect this change are also provided. - In addition, a further flood risk assessment has been undertaken in response to a query raised by Campbell Reith. This FRA confirms that the proposed development will have no material impact upon the risk of flooding in the local area around the site. 	
<p>Energy and Sustainability</p>	<ul style="list-style-type: none"> - Each of the specific points raised have been addressed in a response from XC02 who prepared the initial Sustainability and Energy Statement. - In order to enhance the reduction in C02 emissions from renewable technologies, a ground source heat pump is now proposed in addition to the photovoltaic 	<ul style="list-style-type: none"> - Email from XC02 responding to each of the points raised. - Separate assessment of the use of a ground source heat pump, as an addendum to the main Sustainability and Energy Statement

	<p>panels previous proposed. This change will ensure that the target reductions in CO2 emissions from renewable energy sources can be met in full on-site.</p> <ul style="list-style-type: none"> - An addendum to the Sustainability and Energy Report, to include the effects upon CO2 reductions through the use of a ground source heat pump, is included. 	
Basement Impact Assessment	<ul style="list-style-type: none"> - A full response has been prepared by both Elliot Wood and GEA in order to respond to the various queries raised in Campbell Reith's review of the Basement Impact Assessment and Structural Engineering Report previously submitted. 	<ul style="list-style-type: none"> - Updated Basement Impact Assessment prepared by GEA - Updated Ground Movement Assessment prepared by GEA - Updated Structural Engineering and Subterranean Construction Method Statement

Response to Neighbours' Comments

We are aware of a small number of comments that have been submitted by neighbours and other interested parties as part of the consultation that is taking place as a part of the determination of this planning application.

These comments have been broken down into a number of parts so that each of the relevant subject matters within them can be addressed separately, as set out below.

Comment	Response
Demolition of existing building at boundary with 64 Avenue Road	<ul style="list-style-type: none"> - Although the existing building does directly abut the boundary to 64 Avenue Road, once this is demolished the boundary will be made good to ensure that full separation and security between the properties is maintained. - Specific details of boundary treatments can be secured through planning condition if necessary. - This matter can also be addressed through other regulations such as the Party Wall Act, in addition to controls on demolition and reconstruction which are laid down within the planning system.
Extent of the proposed basement	<ul style="list-style-type: none"> - The content of current planning policy and supporting guidance does not prevent basements extending beyond the footprint of buildings being approved. Indeed, several such basements have been developed in the immediate

	<p>local area including 56, 60 and 62 Avenue Road.</p> <ul style="list-style-type: none"> - Relevant plans show the ground and lower ground / basement levels of each of these properties have been provided for reference. - The test when proposing any basement, including those that extend beyond the footprint of the host building, is whether the basement is technically achievable without causing harm to nearby properties and structures. - A full assessment of the proposed basement has previously been provided which confirms that the development is technically possible without causing structural harm to neighbouring properties. - The relevant technical reports have been subject to independent assessment on behalf of the Council. A further response has now been prepared to clarify queries raised in that assessment. - Together, these reports provide an extended and satisfactory justification for the proposed development and thus meets the requirements of both adopted policy and supporting guidance. - It should also be clarified that the subterranean development is limited to a single storey. A small mezzanine is provided to accommodate plant equipment in a location that minimises its potential impact upon neighbouring buildings but this area does not comprise of habitable accommodation.
<p>Drainage and Run-Off</p>	<ul style="list-style-type: none"> - The development proposal incorporates a Sustainable Urban Drainage System (SUDS). As such, appropriate rates of drainage soakaway and water run-off will be maintained. - This is confirmed in the additional notes provided by Elliot Wood, with rates of run-off limited to 5l/s for the 100 year + Climate Change event, in line with London Plan requirements. - This rate is a significant improvement upon the performance of the existing building and thus will have a positive material effect upon the site.
<p>Protection of Existing Trees</p>	<ul style="list-style-type: none"> - The previously submitted arboricultural assessment confirms that all retained trees, both on the application site and in adjoining gardens, will not be impacted upon by the proposed development. This includes ensuring root protection areas are maintained. - A specific query has been raised regarding the assessment of an existing tree within the garden at 68 Elsworthy Road. It remains the applicant's view that the submitted arboricultural report has correctly assessed the impact

	<p>upon this tree and should be considered in this context.</p> <ul style="list-style-type: none"> - Notwithstanding this, the applicant has made a direct offer to the resident of 68 Elsworthy Road to bear the cost of one of the Council's Registered Arboricultural Consultants to make a further assessment of the relevant tree, in addition to the assessment that has already taken place. - This offer has been declined. If it is considered that further assessment is required then the offer to bear the cost of this remains available. However, we would welcome direction from the Council's own Arboricultural Officer as to whether this is necessary given the detailed assessment that has already been undertaken to date. - Appropriate conditions relating to the protection of relevant trees would be accepted if the Council considers these to be necessary.
<p>Future Provision of Vegetation and Landscaping</p>	<ul style="list-style-type: none"> - A full landscaping scheme for the site has been incorporated into the proposed development. This clearly demonstrates that a high quality garden environment can be maintained following the implementation of the proposed development. - In accordance with relevant policy and guidance, a soil depth well in excess of the minimum requirement of 0.5 metres will be provided across the garden area. This will support an appropriate and high quality garden in the long term. - Again, if deemed necessary then appropriate conditions relating to landscaping would be acceptable. - It should also be reiterated that the proposed development would actually result in an increase in the amount of soft landscaping on-site relative to the existing.
<p>Ameliorating the Effects of Construction</p>	<ul style="list-style-type: none"> - All development will result in some impacts during a construction period and this in and of itself does not form a reason to not grant planning permission for any development. However, any effects can be limited through the use of an appropriate Construction Management Plan. - As such, a draft Construction Management Plan prepared in accordance with the Council's required pro-forma was submitted as a part of the original application submission. - The Construction Management Plan addresses a range of issues including (but not limited to) noise, suppression of dust, the movement of construction vehicles and further protection for retained trees. - As per normal practice, provision of a full and finalised version of this Construction Management Plan will be secured through a legal agreement alongside any planning permission that is granted. Construction will not be allowed

	<p>to commence until this is approved by the Council.</p> <ul style="list-style-type: none">- Throughout the construction programme, the Council will maintain the power to enforce the terms of the Construction Management Plan. If this is breached at any point, the Council will have the powers to prevent further construction continuing until such time as the breach has been remedied.- As such, there is a clearly defined pathway to ensuring that the effects of construction are ameliorated as far as possible and to ensure that the Council maintain considerable control over this process.- it should also be reiterated that the layout of the proposed development site is such that construction vehicles will be able to load and unload from within the site. It will not be necessary to utilise the public highway for any purpose other than for just access to the construction site.
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I trust that this is all clear and offers a full response to all of the items raised. I would be grateful if you could advise as soon as possible as to the status of the application and the next steps towards a determination.

Please do also let me know if you require anything further.

Yours sincerely



Nigel Dexter
Senior Planner