

From: Lopez, Ana
Sent: 16 March 2016 16:33
To: Gracie, Ian
Subject: Belsize Fire Station 2016/0745/P

Hi Ian,

Please find below and attached comments on your recent consultation request for Belsize Fire Station Ref: 2016/0745/P. The majority of responses are requests for further information at this stage, before any comments can be finalised for your response.

Air quality:

Comments: Camden's DP32 sets out that "mitigation measures will be expected in developments that are located in areas of poor air quality". The applicant has submitted a consultation letter for Air Quality, but there's no detailed information included in their application on air quality and no Air Quality Assessment. It doesn't appear that the development hits any of the triggers for air quality assessments outlined [here](#). The Kings College London Air [map](#) shows that the air pollution levels in the planned development area are towards the lower end of the spectrum compared to other areas of the borough. The applicant should review the requirements for an Air Quality Assessment [here](#) and if applicable submit an Air Quality Assessment, otherwise this does not require consultation.

Actions for applicant: To refer to requirements on Air Quality Assessments [here](#) and if required submit an Air Quality Assessment.

LLFA comments:

See attached document.

Energy:

Policy Requirement: Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies set out in the London Plan (2011) Chapter 5 (particularly Policy 5.2) to secure a 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013. GLA guidance on preparing energy assessments and CPG3 should be followed. In particular, improvements should be sought on the minimum building fabric targets set in Part L of the building regulations

Comment: Applicant stated that energy calculations were carried out using the SAP methodology, in line with Building Regulations Part L 2013. The energy statement indicates an expected emissions reduction of 41.4% in comparison to the existing building under its current use. It would be useful to see the methodology in more detail to understand how these figures were ascertained and to ensure that Camden Policy and GLA guidance was followed when preparing the energy assessment. The existing building has a total useful floor area of 973m² therefore does not fall under regulation 28 of the Building Regulations under Part L relating to Consequential Improvements, however the refurbishment of the building includes works to the roof and floor of the existing building therefore opportunities to improve the thermal performance of these elements should be considered. Additional opportunities not included in the assessment also include secondary glazing.

Action for applicant: To submit more detail on methodology and modelling used to determine both the baseline and expected CO2 figures in the energy statement, ensuring it is in line with Camden Policy requirements and [GLA Guidance on Preparing Energy Statements](#).

To further investigate opportunities to improve the thermal performance of existing thermal elements, in particular those which are undergoing works as part of the refurbishment, whilst ensuring that the character and breathability of the building is not compromised. Refer to guidance on sensitive retrofitting to historical buildings found on [this page](#).

Policy Requirement: CS13 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement.

Comment: CS13 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies wherever feasible. The energy statement submitted indicates that it would not be feasible to include renewable technologies predominantly due to the listed status of the building. We would like to see more information on the applicant's renewable feasibility assessment, in particular more information on GSHP and ASHP and related noise, cost, and space issues.

Actions for applicant: To submit further information on feasibility studies for renewable technologies, in particular more detail on noise studies for ASHP and cost and design studies for GSHP.

Sustainability:

Policy Requirements: Implement the sustainable design principles as noted in policy DP22 including (but not limited to) measures outlined in the table below. Achieve a BREEAM Domestic Refurbishment 'Very Good (minimum) rating, aspiring to 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Comments: The applicant has followed BREEAM Domestic Refurbishment. The applicant has stated that the listed status of the building has prevented thermal improvements to the existing building fabric. As BREEAM 'Very Good' and 'Excellent' have not been achieved the applicant should be offering a full justification of why other available credits are not achievable – this is currently missing for some of the credits (HEA3 and 4). There may be further opportunities to introduce upgrades to the building fabric (ensuring they are sensitive to conservation requirements of the development) e.g. roof and floor insulation and secondary glazing. .

The statement should include further information on climate adaptation measures, particularly around overheating.

Actions for applicant: To further investigate opportunities for improvements to the existing building fabric which are sensitive to the conservation requirements of the development. Refer to guidance on sensitive retrofitting to historical buildings found on [this page](#).

To include further information on climate adaptation measures, particularly around overheating.

Nature Conservation and Biodiversity:

Comment: No ecological scoping survey was submitted as part of the application. We would need to see an ecological scoping survey to support the applicant's assumption that the development is in an area of low ecological value – plus the recommendations that their qualified ecologist has made. The applicant should refer to CPG3 which provides guidance on when scoping and protected species surveys are required. The applicant should be aware that, should the scoping survey highlight any potential for protected species then this may require further surveys and these will need to be completed and submitted as part of the application.

Actions for applicant: To submit an ecological scoping survey with recommendations. Refer to CPG3 for guidance on when scoping and protected species surveys are required. Should the scoping survey highlight any potential for protected species then this may require further surveys to be submitted as part of the application.

Many thanks,

Ana Lopez
Sustainability Officer
Culture and Customers
Culture and Environment
London Borough of Camden

Lead Local Flood Authority – London Borough of Camden

Statutory Consultee for all Major Developments (SuDS)

Statutory Consultee for all Major developments >1ha

Scheme Address	Belsize Fire Station, 36 Lancaster Grove, London, NW3 4PB
Planning Reference	2016/0745/P
Size of site (as stated on application form)	0.143 Ha
Date	11/03/2016
Recommendation:	Belsize Fire Station, 36 Lancaster Grove, London, NW3 4PB

Description of Development:

Change of use of former fire station (Sui Generis) to provide 12 self-contained residential units (Class C3) including single storey side extension and insertion of roof dormers, with associated external alterations, landscaping and parking.

Policy Requirement:

- Submit an FRA if >1ha
- Major developments to achieve [greenfield run-off rates](#) wherever feasible and as a minimum 50% reduction in run off rates.
- NPPF requires all major developments to include SuDS unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014).
- Development should follow the [drainage hierarchy](#) in policy 5.13 of the London Plan below:
 - store rainwater for later use
 - use infiltration techniques, such as porous surfaces in non-clay areas
 - attenuate rainwater in ponds or open water features for gradual release
 - attenuate rainwater by storing in tanks or sealed water features for gradual release
 - discharge rainwater direct to a watercourse
 - discharge rainwater to a surface water sewer/drain
 - discharge rainwater to the combined sewer
- Developments in areas known to be at risk of surface water flooding are designed to cope with being flooded.

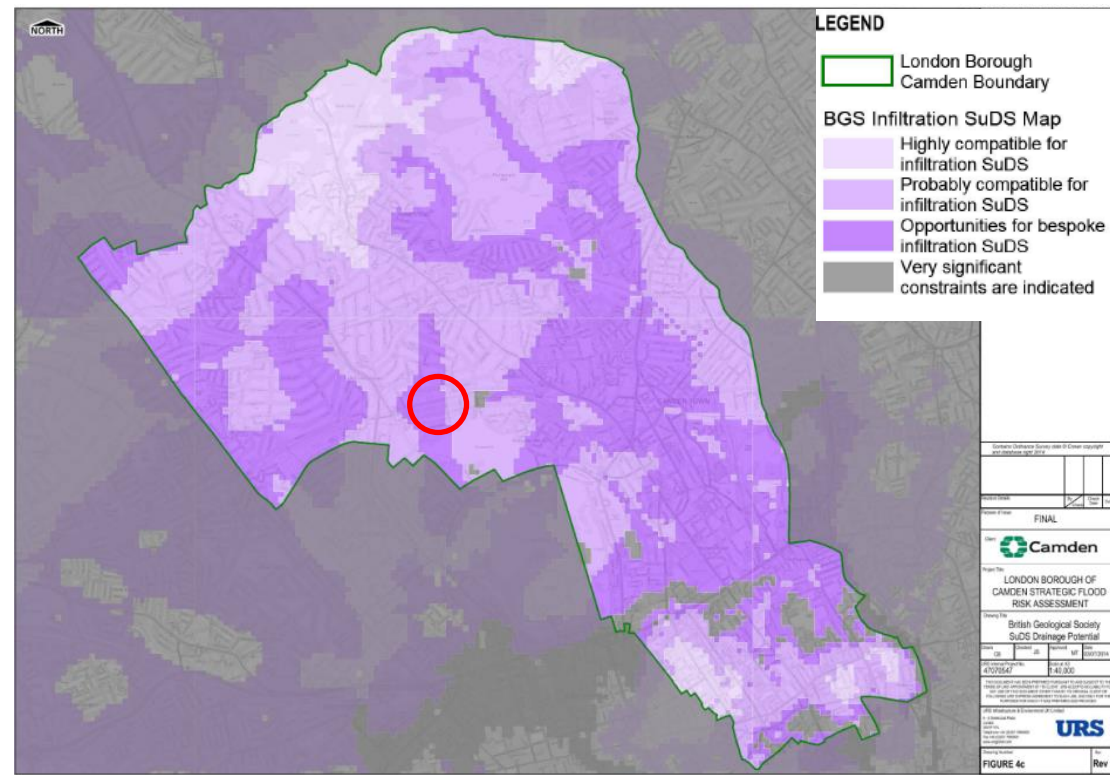
Best practice guidance recommended within the non-statutory technical standards:

- Constrain off volumes to [greenfield run off volumes](#) for the 1 in 100 year 6 hour event.

Location of development relative to surface water flood risk:



Location of development relative to infiltration compatibility:



Documents submitted (✓ = YES, x = NO):

- ✓ surface water drainage statement
- X drawings showing details of SuDS extent and position
- ✓ completed drainage proforma
- X SuDS maintenance plan

Proposed SuDS:

Existing storm Sewer with 1 or more storm cells

Greenfield, Existing and Proposed Run off rates:

	Existing Rate (l/s)	Proposed Rate (l/s)	Difference (l/s)	% Diff	Notes for developers
Greenfield QBAR	0.8	N/A	N/A	N/A	QBAR is approx. 1 in 2 storm event. Provide this if Section 6 (QBAR) is proposed.
1 in 1	0.6	0.6	0	0	Proposed discharge rates (with mitigation) should aim to be equivalent to greenfield
1 in 30	2.8	2.8	0	0	

1in 100	3.8	3.8	0	0	rates for all corresponding storm events. As a minimum, peak discharge rates must be reduced by 50% from the existing sites for all corresponding rainfall events.
1 in 100 +CC	N/A				The proposed 1 in 100 +CC peak discharge rate (with mitigation) should aim to be equivalent to greenfield rates. As a minimum, proposed 1 in 100 +CC peak discharge rate must be reduced by 50% from the existing 1 in 100 runoff rate sites.

Proposed volume of water attenuated

N/A

There is not enough information submitted to assess this. The applicant has not submitted drawings of proposed SuDS.

Policy compliance and Further information required

Submit an FRA if >1ha

Comment: Site is < 1ha therefore requirement does not apply

Major developments to achieve [greenfield run-off rates](#) wherever feasible and as a minimum 50% reduction in run off rates.

Comment: This has not been achieved. Although the site is a low flood risk area, the [SFRA](#) shows that Lancaster Grove has previously flooded. Effective SuDS need to be put in place in order not to increase the flood risk to others and not put strain on the existing waste water system (which Thames Water has stated cannot accommodate the needs of the application unless effective SuDS are put in place).

The applicant has stated that as the existing site is developed, the NPPF requirement to maintain the existing run-off rate is considered to be the most suitable. However Camden's Development Policies, which state that major developments should achieve greenfield run-off rates wherever feasible and as a minimum achieve 50% reduction in existing run-off rates, should be followed unless evidence can be shown that site challenges make this not possible.

The applicant's SWDS states that as the site lies on London clay, infiltration techniques are not suitable; however the SFRA SuDS Drainage Potential map (see above) indicates that the ground conditions are probably compatible for infiltration SuDS or bespoke infiltration SuDS.

There is limited information on maintenance plans.

Action for applicant: To further investigate infiltration SuDS techniques with the aim to meet Camden Development Policy targets, and to give further information on why some of the measures within the sustainable drainage hierarchy have not been proposed. To also give further details on SuDS proposals including size and location and maintenance plans.

Developments to include SuDS unless inappropriate

Development should follow the [drainage hierarchy](#) in policy 5.13 of the London Plan

Comment: The only SuDS proposed are storm cell/s alongside the existing storm sewer. There is no detail on how many or where it will be located.

Action for applicant: To further investigate infiltration SuDS techniques with the aim to meet Camden Development Policy targets, and to give further information on why some of the measures within the sustainable drainage hierarchy have not been proposed. To also give further details on SuDS proposals (including storm cells) including size and location.

Developments in areas known to be at risk of surface water flooding are designed to cope with being flooded.

Comment: The site is in an area of low flood risk; however the SFRA shows that Lancaster Grove has previously flooded.

Thames Water's response states that the existing wastewater infrastructure cannot accommodate the needs of the application, unless an acceptable drainage strategy is put in place which is approved by the Council.

The current SuDS proforma and SWDS show that greenfield run-off rates (or 50% reduction in current run-off rates) have not been achieved. A number of SuDS techniques, in particular infiltration techniques, have been considered but deemed not feasible, however the SFRA SuDS Drainage Potential maps indicate that there is possible compatibility with infiltration SuDS techniques. There could also be consideration given to the addition of external soft landscaping.

Thames water also require several conditions to be attached to planning permissions including a Groundwater Risk Management Permit and requirement for the developer to demonstrate measures to be undertaken to minimise groundwater discharges into the public sewer. Thames Water also notes that there are restrictions on where the building and infrastructure takes place because of the proximity to the public sewers.

Action for applicant: To reconsider SuDS opportunities and provide explanation on why greenfield run-off rates cannot be achieved. Ensure that conditions required by Thames Water, as stated in their response letter, are met.