

23 Ravenshaw Street London NW6 1NP  
2017/0911/P

# Supplementary Planning Statement

12/12/2018

**Original Planning Statement 2017**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497455/file/document?inline>

**Original Design & Access Statement 2017**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

**The Camden Local Plan 2017:**

<https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework/>

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## Original 2017 Application Statements

**Note about links:** This document contains links to external reports. If you are reading this as a PDF, just click the link. If you are reading it in Microsoft Word hold down the “Ctrl” key, then click the link to open the external document in a web browser.

### Planning Statement 2017

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497455/file/document?inline>

### Design & Access Statement 2017

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

### Camden Local Plan 2017

[https://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=3681698&](https://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3681698&)

# 1. Introduction

The Planning Statement that accompanied our application in February 2017 addressed the policies in the previous LDF. This document is an addendum that addresses the revised policies in the new Local Plan, as adopted by the Council on 3rd July 2017.

Although most of the policies, titles and wording have changed, much of substance remains the same. Consequently, we have no reason to believe that the application is any less compliant with the new Local Plan than it was with the previous LDF. The most significant change we are aware of is the introduction of the affordable housing contribution for developments under ten units; however, as the contribution has already been agreed with the case officer, the policy is not at issue. Indeed, the case officer at the time, Rob Tulloch, wrote up his report for the Members Briefing Panel on October 3rd 2017, three months after the new local plan came into force, recommending approval.

*Hi Chris,*

*"I wrote the application up for Members' Briefing, but unfortunately due to the affordable housing contribution it has to go to committee. The next committee is on 26<sup>th</sup> October and the report will need some minor tweaks to change it from a delegated report to a committee report, but it will be ready in time. They will normally start to look at the committee reports next week, but we won't know till the week after (w/c 16<sup>th</sup> October) if it has made it on the agenda."*

*Kind regards*

*Rob Tulloch (3 Oct 2017)*

Accompanying this statement is a separate document that addresses the concerns expressed by Mr Tulloch in his email to us of 20<sup>th</sup> Oct 2017, just before the application was due to be presented to the Members Briefing Panel. His email reflects the views of those officers present at the internal Design Review Panel meeting held on 17<sup>th</sup> Oct. 2017\*

\*From the Freedom of Information Act request (FOI10227) provided to us on 4 Dec 2017.

## Camden Local Plan

In studying these new policies, we can see no material differences between the old and the new policies that could affect the outcome of the case officer's original decision to recommend the application for approval.

## Neighbourhood plans

We understand that, while officers and members must have regard to local plans; the Localism Act 2011 places no obligation on applicants to consult local neighbourhood plan activists directly. However, at no time during the application have officers expressed the opinion that the application is not in conformity with the Local Neighbourhood Plan.

## Preparing the Local Plan

It is not clear that the authority has entirely followed the principles embodied in the NPPF during the processing of this application. Our detailed pre-application design of Feb. 2015 was well received. We incorporated officers' advice into our final application design, which is very much an enhancement of the pre-application version.

The submitted application was shaped by your officers' recommendations and would not have been put forward in its current form, had it not been for their advice and the consequent encouragement. However, very late in the application process, in fact right before the application was due to be put before the Members Briefing Panel, another group of officers, in a an internal Design Review Panel (DRP) meeting\*, set aside critical aspects of that advice and dismissed the recommendation of the case officer.

No explanation as to why these officers were only involved at such a very late stage has been provided.

Astonishingly, the case officer's last advice to us is that we start all over again; with another pre-application, and go through the whole process all over again.

The NPPF asks Local Authorities to:

*'...approve development proposals that accord with an up-to-date development plan without delay, unless any adverse impacts of doing so would **significantly and demonstrably** outweigh the benefits, or if **material** considerations in a particular case indicate that the plan should not be followed.'*

In his email of 20 October 2017, the Mr Tulloch put to me the reasons behind his senior officer's sudden opposition to his recommendation; which was that

the application should be approved. Your officers hadn't mentioned any of these reasons before. In the main, these new refusal reasons seem based on that most subjective of policies, D1 Design. Other miscellaneous comments were put forward concerning amenity and level access. We have addressed each of the DRP officers' refusal reasons in turn, in an accompanying document: '**Response to the Design Review Panel's Comments.pdf**'.

Even so, why the supposed harm that would be created by the development (particularly by the front façade design and the rear mansard) would **significantly and demonstrably outweigh the applications' benefits** in line with NPPF advice has not been explained.

In his Oct 20<sup>th</sup> email, the applications' many positive attributes and benefits (which the case officer must have recognised in his draft approval recommendation) are conspicuous by their absence. Balanced decision making seems to have been brushed to one side; as the officer suddenly seems to focus his efforts (quite uncharacteristically) on getting a withdraw.

It is not clear that your officers have had due regard to the applications' benefits and weighed them objectively in arriving at their refusal decision. The points put to me are all negative.

Balanced reports should be presented to the committee, not just bits of advocacy to support one point of view. Imbalanced reporting will invalidate any decision so reached if challenged. Failure to consider all the material considerations is imbalance. Officers should not present bits of advocacy but must give the members of the Council a balanced view and supporting information. It is not clear that this has been the case here.

## **London Plan**

The new draft London Plan and the new NPPF place renewed emphasis on encouraging wherever possible, more high-density development than ever before. The NPPF and Local Plan both go so far as to insist that decision makers are to resist developments that do not make the maximum use of their sites. Refusals that plead the case of over-development, when a design may just as easily be seen as an efficient and imaginative use of its site, will need to be very robust indeed. One of the core goals of our design was to make the most efficient use of the site as possible, while respecting its context. The design strikes that balance and achieves precisely those objectives.

## **Adapting to Camden's growing population and to social change**

- A Life-Times Homes Statement accompanied the application.
- Access to the site and into the entrance lobby (and bike/recycling store) is level; despite the slope of the street.
- A full-sized lift would have compromised the internal accommodation to an unaccepted degree; however, the inclusion of an inclined platform lift to all the floors, coupled with ample corridor widths, ensures that **the development would be 100% wheelchair accessible.**

Please see: **Life-Times Homes Statement:**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497449/file/document?inline>

## **Improving transport**

- The new development would be 100% car-free.
- Two existing parking permits would be revoked and two on-street spaces created in place of the cross-over; freeing up four spaces.
- On-site bike storage facilities for 16 bikes; 8 with direct access to the street was considered acceptable by the case officer.
- Originally the site was PTAL Level 3. A new Site Specific PTAL Assessment\* demonstrates that the site is now PTAL Level 4 due to ongoing transport improvements.

\*Please see the attached PTAL Level 4 Site Specific PTAL Assessment. The TfL WebCAT planning site ascribes a misleading PTAL reading of 1B to the site. As was confirmed to me by TfL, the calculator takes no account of pedestrian walkways. In the case of Ravenshaw Street, it ignores the existence of Black Path, the main pedestrian thoroughfare leading directly to the stations at West Hampstead Interchange.

**The application accords fully with Local, London and National Transport policy.**



## 2. Growth and spatial strategy

### Policy G1 Delivery and location of growth

The answer provided previously at 1.17, emphasising efficient use of the site, is entirely apposite. A smaller scheme of perhaps 1 or 2 bedroom flats, on the car site alone, would have almost certainly had permission a long time ago but would have wasted much of the site's potential.

Please see the **Design and Access Statement 3.1 Page. 21.**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

The result of numerous experimental layouts, the design has to represent one of the most efficient uses of this site possible. It achieves this with minimal impact on the street scene, neighbouring amenity and the wider environment.

### Location of growth

The site is very well situated for public transport links, being 9, 11 and 12 minutes' walk from West Hampstead Thameslink (Interchange), Overground and Tube stations respectively. It is also within 200m of four bus stops.

### Harnessing the benefits of growth

The policy priority is the provision of new sustainable, residential accommodation. Any refusal has to be on the most robust grounds. The development would provide six new units as well as replacing and improving two existing units, while having little material impact on the public realm or neighbouring amenity.

### Policy A1 Managing the impact of development.

In pre-application advice, and during the course of the application itself, the impact of the development on neighbouring amenity was not regarded by officers as being a particular problem. Only in the Design Review Panel meeting were concerns raised in this regard. Their principal issue seems to be with the impact of the developments' south-facing mansard roof on the amenity of nearby gardens to the south. We believe those fears to be overstated.

As demonstrated by the attached illustrations; from the two closest gardens of No.25 and No.27 the mansard roof is barely visible at all. Further away down the hill, as the distances increase, the roof becomes evident from the gardens of No.29 at 16.5m, No.31 at 20.7 m, No.33 at 25.7m and No.35 at 29.7, the impact diminishing with distance.

To clarify just how the roof would appear from neighbouring gardens we have prepared a set of 360° panoramic CGI views, illustrating how much impact the new mansard roof would have on the amenity of the gardens in question. Please click on the following links:

**Rear Garden View CGI Images: Click the links below to view the images, then follow the instructions in the images' annotations.**

Garden of No.17	<a href="https://kuula.co/post/7PZ7H/collection/7fBRg">https://kuula.co/post/7PZ7H/collection/7fBRg</a>
Garden of No.19	<a href="https://kuula.co/post/7PZ76/collection/7fBRg">https://kuula.co/post/7PZ76/collection/7fBRg</a>
Garden of No.21	<a href="https://kuula.co/post/7PZGM/collection/7fBRg">https://kuula.co/post/7PZGM/collection/7fBRg</a>
Garden of No.25	<a href="https://kuula.co/post/7PZY5/collection/7fBRg">https://kuula.co/post/7PZY5/collection/7fBRg</a>
Garden of No.27	<a href="https://kuula.co/post/7PZY0/collection/7fBRg">https://kuula.co/post/7PZY0/collection/7fBRg</a>
Garden of No.29	<a href="https://kuula.co/post/7PZZj/collection/7fBRg">https://kuula.co/post/7PZZj/collection/7fBRg</a>
Garden of No.31	<a href="https://kuula.co/post/7PZZW/collection/7fBRg">https://kuula.co/post/7PZZW/collection/7fBRg</a>
Garden of No.33	<a href="https://kuula.co/post/7PZZS/collection/7fBRg">https://kuula.co/post/7PZZS/collection/7fBRg</a>
Garden of No.35	<a href="https://kuula.co/post/7PZ1L/collection/7fBRg">https://kuula.co/post/7PZ1L/collection/7fBRg</a>

It can be seen from these panoramas that the mansard is mainly visible, not from the adjacent houses at 25 and 27 Ravenshaw Street but from gardens further away at No.29 (at 16.5m), No.31 (at 20.7m) and No.33 at (25.7m). The distances shown are from the 'camera eye' to the centre of the solar panels.

Given the distances involved, we do not see a strong case that the mansard roof is either unduly overbearing, creates a sense of enclosure, overlooking, over-shadowing, causes light pollution or creates any other form of material harm; certainly any degree of harm sufficient to amount to a sound refusal reason.

## **Making the most of our limited land**

In our view, this development strikes the right balance between the authorities many and often competing policy goals.

## **Density**

The developments' density sits just where it should be when set against the London Plan Density Matrix. The accompanying Design Review Response document details just how the development's density relates to the PTAL/London Plan Matrix and with neighbouring residential properties.

## **Good Design**

This application is a 'Good Design'. In fact, it is a very good design; and one your case officer thought good enough to warrant approval. Another officer described the design as "not imaginative enough" but "not harmful". We would argue that the development is very imaginative in the way it solves a multitude of difficult design problems to arrive at a suite of sustainable, well appointed, dual aspect, well lit, high-quality apartments with adequate amenity provision and a coherent external appearance. It achieves this in spite of the site's complexities and with minimal impact on the public realm and neighbouring amenity. By filling in the 'broken tooth' gap and removing an unsightly side extension it completes, compliments and enhances the Victorian street scene.

Whether or not the contemporary approach taken to the design's aesthetics is regarded as unacceptable by one of the DRP officers, the fact remains that it was accepted as a perfectly valid approach at pre-app and at application stage by the case officer and, we have to presume, the design officer. There is nothing inherently 'inappropriate' about setting a contemporary new build in a Victorian terrace. There are many examples of this approach dotted throughout the borough, they always divide opinion – such as No.22 Ravenshaw Street, approved by your authority in 2006 (2006/2388/P).

## **Alternative façade design**

However, we are grateful for your officer's comments and with a view to accommodating them, accompanying this document is an alternative front façade treatment that, in light of your officer's views, takes a more moderate tack.

It is less assertively contemporary. We hope officers will welcome it as being more 'residential'. The design introduces white render window surrounds

along with triple window and double mullion frames which better respond to the adjacent bay windows. Parapets are introduced, along with a smooth blue clay slate tiles instead of the standing seam metal roof. These limited and subtle additions are designed to tie the front façade into the existing street scene to a greater degree, by alluding more directly to the Victorian bay windows to either side.

Our original approach sought to rhyme with, but not mimic, the adjacent Victorian geometry while contrasting with it. We had the same objective in our use of contemporary materials in a matching colour pallet. We submitted the application in the belief that this approach would be supported; having been told unequivocally in our pre-application advice that it would be. However, we hope officers can accept these revisions\* as a viable and welcome response to your Design Review Panel's observations.

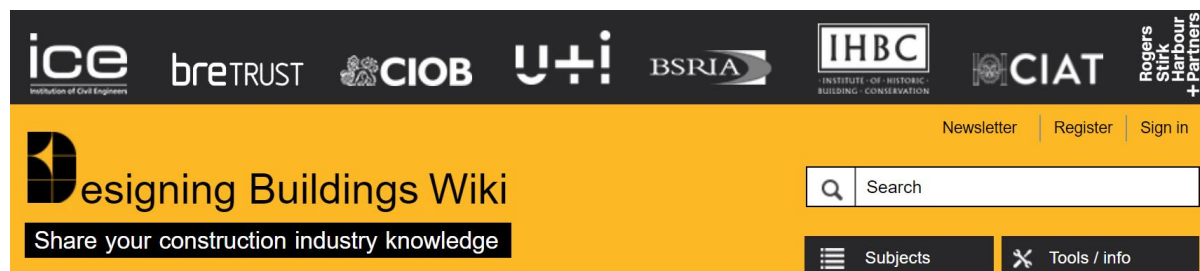
While they are, in the context of the development as whole, relatively minor cosmetic amendments (i.e., changing the façade panels and window frames from grey to white, introducing parapets and as requested, a grey slate tile on the roof), they go a long way to integrating, what is still a contemporary design, more fully into the street scene. We hope you see these amendments for what they are; as a genuinely constructive and positive design response to your officer's latter advice.

**\*Please see the attached drawings: 'Front Façade Revision V2.pdf'**

## ‘substantially different scheme’

While there is no overall agreement on what does or does not constitute a ‘substantially different’ amendment, some guidance is available and some precedents have been arrived at. While probably not definitive, they provide some guidance in determining if an amendment is substantial or not.

### General guidance on material changes



[https://www.designingbuildings.co.uk/wiki/Non-material amendment to planning permission](https://www.designingbuildings.co.uk/wiki/Non-material_amendment_to_planning_permission)

To paraphrase; material changes, for which a fresh application might be required could include:

- Significantly increasing its size.
- Changes to windows or other openings that impact on neighbouring properties.
- Changes that alter the description of development.
- Changes to the application site area.
- Significant alterations to design or the siting of the proposals.
- Changes that would affect objections to the original proposal.

It may first appear that terms such as “significant alterations to design” or substantial are self-explanatory; and that perhaps the terms significant can be interpreted as officers see fit. However, a more nuanced view is taken by the Planning Inspectorate.

## **Planning Inspectorate: ‘...must be of significance, of substance and of consequence’**

The following extract from the Journal of Planning Law (2015, Issue 13, page 58), quoting an Inspector’s decision from June 2010, provides further guidance on materiality:

*“It must be of significance, of substance and of consequence. Put simply, it has to matter. That does not mean that it has to be harmful. However, an obvious lack of harm in planning terms may point to a lack of consequence and in turn of materiality, even possibly where the changes may themselves be extensive and/or numerous.”*

The revised façade illustrated in the accompanying **‘Front Façade Revision V2.pdf’**, would not result in any additional harm and only improve the application. As such, while it is acknowledged that the changes are quite visible, given their beneficial nature it is questionable what ‘significance, substance and consequence’ the revision would have. We, therefore, consider that in the context of the overall scheme, in planning terms, they change very little.

The revisions are not harmful. If they are not harmful then they are not material, and if they are not material to the application they are not substantial. Therefore, they do not warrant a new application.

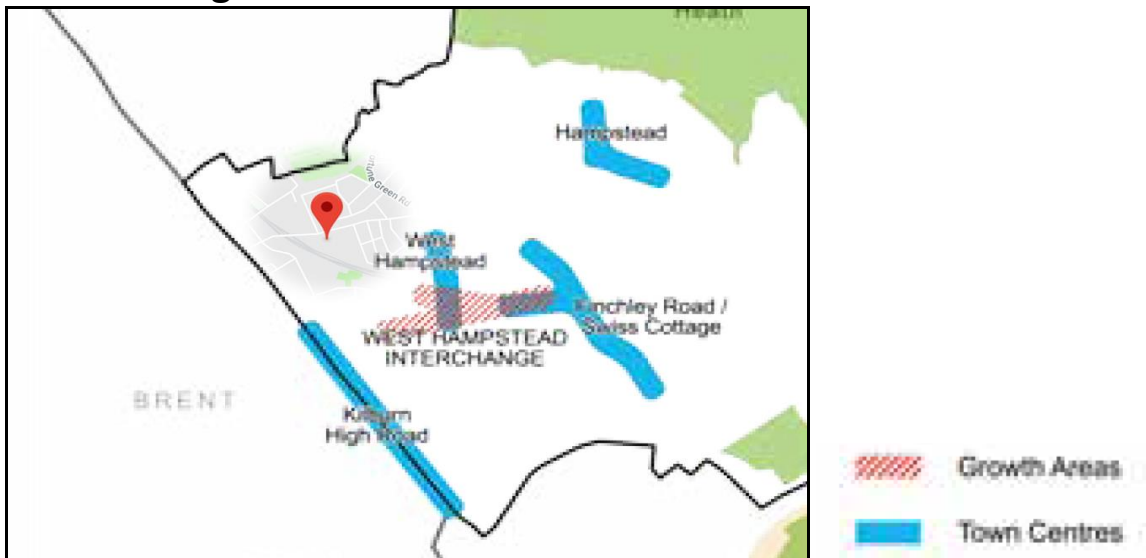
The June 2010 judgement referenced above, **relates to potential planning effects rather than the extent of the change**. None of the participants in the planning process would be disadvantaged by the adoption of this amended façade treatment, so we see no reason why you should refuse to accept them. These amendments should be perfectly admissible, and now be regarded as part of the application.

*‘Local planning authorities should look for solutions rather than problems, and decision-makers at every level should seek to approve applications for sustainable development where possible.’ - NPPF 187.*

## Multi-site proposals

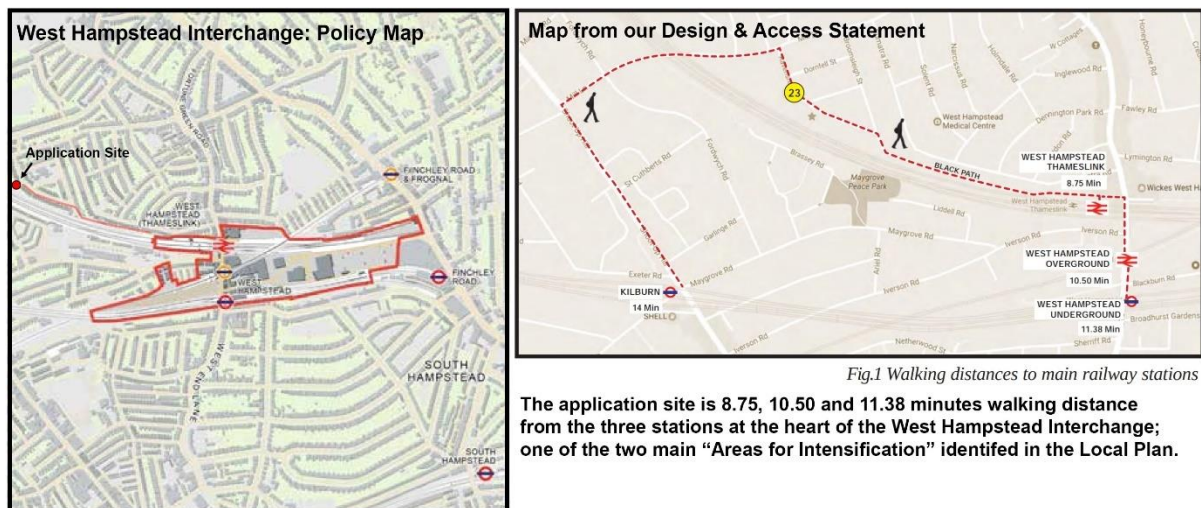
The site is, in fact, a multi-site assembly of three titles, assembled over 20 years; allowing the application to make far more efficient use of the site than would otherwise have been possible.

## Location of growth



**Above:** The Site, identified with red pin, is a 9 minute walk from the West Hampstead Interchange, a major growth area.

## Growth areas / West Hampstead Interchange



This site is a 9 minute walk from the West Hampstead Interchange. The areas' existing housing stock is under enormous pressure and expected to experience significant growth other the next few years. Making the most of small sites is an increasingly important planning priority.

## 3. Meeting Housing Needs

### Maximising housing supply

The density of the proposed building does not compromise the quality of accommodation and amenity being proposed. The size, mix and quality of the accommodation is high. Access, amenity and sustainability are all compliant with their respective policies. Impact on the public realm is 'not harmful'\* and the impact on private amenity is minimal.

*\* [Name 1: 'Senior Planning Officer']: "Front fits in w/ terrace and respects context with reference to surrounding terrace. Materials are good. 'Design not harmful but not imaginative."*

### Policy H1 Maximising housing supply

#### Maximising housing supply

The application density is at the higher end of the range and represents the optimal amount of accommodation the site is capable of providing.

**It is consequently fully in accordance with Policy H1.**



## **Policy H4 Maximising the supply of affordable housing**

The affordable housing contribution was agreed with the case officer in 2017 in accordance with Policy H4.

**The application is fully compliant with Policy H4.**

## **Policy H6 Housing choice and mix**

The development provides:

- a. Functional, adaptable and accessible living spaces;
- b. Self-contained homes that meet the nationally described space standards
- c. Compliance with Building Regulations
- d. The development would be 100% wheelchair accessible; exceeding policy requirements.
- i. The dwelling mix is the best that can be achieved given the site constraints and is otherwise entirely in accordance with policy requirements.

## **Accessible and adaptable dwellings (Lifetime Homes) and wheelchair user dwellings**

Please refer to our **Lifetime Homes Statement**:

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497449/file/document?inline>

**The application fully complies with Policy H6.**

Please refer to our original **Design and Access Statement**:

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

Updates to officers' remarks Re.: **Cycle Ramp and Sheds**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599981/file/document?inline>

Updates to officers' remarks Re.: **Intensive Green Roof, Overheating Risk and Slot Drain Detail**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647028/file/document?inline>

## **Policy H7 Large and small homes**

The proposed dwellings comply with the floor space requirements of the supplementary planning guidance of both the London Plan, Policy H6 and Nationally Described Space Standards. In line with H6, all the units will meet all the Lifetime Homes Standards. Wheelchair turning circles and stairway platform lift tracks are illustrated on the plans when necessary, and our Lifetime Homes Statement accompanies the application. The development is 100% wheelchair accessible.

**The application complies with Policy H7.**

### **Why demolish “a perfectly good house”?**

#### **Character of the development, the site and the area, and child density**

The existing house makes very poor use of the site. It is of very little architectural merit and of minimal historical significance. Having to develop a new building around it would significantly restrict the design options and the amount of accommodation as well as introducing a host of additional construction problems. After weighing up all the realistic alternatives, we decided to redevelop the site as a whole. Maximising the potential of the site, of necessity, involves replacing the existing house.

Conservation does not mean holding onto everything at all costs. Sometimes buildings just outlive the usefulness. The existing building is not in a conservation area; it is not a heritage asset or near a heritage asset. Please see our application submissions that deal with these aspects of the application:

#### **Sustainability: Demolition vs. Retrofit**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599951/file/document?inline>

#### **Building Retention vs Replacement Statement**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599953/file/document?inline>

## **Policy H8 Housing for older people, homeless people and vulnerable people**

- Please refer to our **Lifetime Homes Statement:**  
<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497449/file/document?inline>
- Allowing for the slope of the street, access from the street to entrance bridge is perfectly level.
- Access into the building's lobby and bin/bike storage area is perfectly level with wide entrance doors.
- An inclined platform lift to all the floors along with ample corridor widths ensures that the development will be 100% wheelchair accessible; exceeding policy requirements.
- The site is superbly situated for public transport links, being 8.75, 10.50 and 11.38 minutes' walk from WH Thameslink (Interchange), Overground and Tube stations respectively.
- Natural light penetration into the apartments is second to none, via the full high S/SW facing rear windows.
- The development will not cause harm to neighbouring amenity.

**The application, therefore, complies with Policy H8.**

## 4. Community, health and wellbeing

### Policy C5 Safety and security

**External safety and security issues:** Filling in the gap in the terrace would prevent direct access from the street to the rear of the building and into the rear gardens of neighbouring properties, enhancing their security. The windows of the four proposed additional dwellings that overlook the street will contribute to community safety and security.

To the rear, thieves occasionally have accessed houses on this side of Ravenshaw Street via the gardens of Ellerton Tower, which is often open to Mill Lane. Six of the proposed new dwellings would have wide open views to the rear from windows and balconies; significantly enhancing natural surveillance, to benefit neighbouring properties. Additional anti-climb security measures may be required along the back wall. We will seek further advice from security professionals on this matter.

**Internal safety and security issues:** To the front, the bin and bike store does not provide direct access to the building core. The main entrance lobby door allows 24/7 access to the lobbies secure post and parcel boxes; which will significantly reduce the need for delivery drivers to access the rest of the building.

Secure access to the building from the post lobby is via internal glass doors fitted with a building access control system. A similar access control system will operate to the rear at basement level.

A formal Crime Impact Assessment has not been requested.

An additional benefit of the development will be the removal of the crossover and its replacement with a fully flat pavement. Planning officers have not yet raised any particular concerns with respect to security issues.

**The application complies fully with Policy C5.**

## Policy C6 Access for all

### Lifetime Neighborhoods

- A **Life-Times Homes Statement** accompanied the application.  
<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497449/file/document?inline>
- A **Design and Access Statement** accompanied the application showing how the specific needs of disabled people have been integrated into the proposed development. It also shows the required number of cycle spaces, the siting of which the case officer found to be acceptable.  
<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>
- Access from the street to the entrance bridge is perfectly level.
- Access into the building's lobby is perfectly level, with wide entrance doors.
- An inclined platform lift to all the floors, along with ample corridor widths, ensures that the development will be 100% wheelchair accessible, exceeding policy requirements for 20% accessibility.

**The application complies fully with Policy C6.**

## 6. Protecting amenity

### Policy A1 Managing the impact of development

**We believe that the application complies fully with all the relevant elements of Policy A1.** Detailed responses follow.

#### Protecting amenity

a. The development does not harm any public amenity. It provides adequate levels of amenity for the occupants, and neighbouring amenity will not be harmed. Although the case officer made no mention of it during the pre-application or during the application itself, other officers in the Design Review Panel meeting raised concerns about the impact of the South facing mansard on the amenity of gardens to the south. Our view is that while the roof may have some small impact, the impact is not so significant as to warrant a refusal, when considered in the context of the proposal as a whole.

#### Impact on gardens to the south

The new mansard would be not overbearing or create a sense of enclosure; there will be no overlooking, overshadowing or light pollution issue, or any other problem that could constitute significant material harm. The level of visual impact is addressed in the accompanying document and 360° CGI illustrations.

**Visual impact on rear garden CGIs:** Please click the following link to see views of the mansard as it would be seen from neighbouring gardens.

(In MS Word hold down 'Ctrl' and click to view)

<https://kuula.co/post/7PZ7n/collection/7fBRg>

These panoramas present a realistic view of the impact that the rear mansard would have on neighbouring amenity. It can be seen that the mansard is mainly visible, not from the two closest properties; No.25 and No.27, but from those further away, namely: No.29 at 16.5m, No.31 at 20.7m and No.33 at 25.7m. The distances are to the centre of the solar panels.

### **Visual privacy and outlook**

e. Visual privacy and outlook for both occupants and neighbours has been a key driver behind the design. Views from every window, garden and balcony have been checked and rechecked in our BIM model; from neighbouring properties looking towards the development and, from within the development looking out.

The development would respect the privacy of both occupants and neighbours; in spite of its density. Any partial views from windows into gardens that do exist are at quite oblique angles. To the rear of the proposal, facing NW, the number of windows able to look down on No.21 is actually reduced.

### **Sunlight, daylight and overshadowing**

f. Our report shows that Sunlight and Daylight and Overshadowing impacts on No.21 all fall within acceptable levels. Please see:

**Daylight Sunlight Overshadowing Figures** (Hold down 'Ctrl' and click to view)  
<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497440/file/document?inline>

**Daylight Sunlight Overshadowing Report** (Hold down 'Ctrl' and click to view)  
<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497442/file/document?inline>

### **Artificial lighting levels**

g. All the rear windows of the proposed development face the rear railway bank, away from neighbouring properties. The large patio doors are predominantly set back into enclosed balconies or below the tops of the garden walls; therefore, no light pollution issues are anticipated.

### **Transport impacts**

c. The existing site car park exit is not intensive, but still in frequent use. The new development would be 100% car-free. Existing parking permits will not be renewed. In addition, removal of the crossover would free up space for two additional on-street parking spaces if required. On-site bike storage facilities were considered perfectly acceptable by the case officer. Due to recent transport improvements, the site is PTAL Level 4. Arguably, the impact on transport infrastructure would be at least neutral, if not actually positive.

## **Construction Management Plans**

i. The developer will be required sign up to the Considerate Constructors Scheme and follow guidance within Camden's Considerate Contractors Manual. A Draft Construction Management Plan accompanied the application.

### **Construction Management Plan, 1st Draft**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497431/file/document?inline>

## **Noise and vibration**

j. The finished development would produce no mechanical noise and vibration. Construction noise and vibration are dealt with by the Construction Management Plan. Concerning the impact of railway and road noise on the apartments themselves, we submitted a full Noise and Vibration Survey with the application. Noise and vibration levels were found to be within perfectly acceptable limits:

### **Noise and Vibration Assessment**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497450/file/document?inline>

## **Water and wastewater infrastructure**

n. The development would lead to a significant reduction in rainwater run-off when compared to the existing site. The area of permeable topsoil in the proposed development is almost identical to the current site. A sizeable rainwater collection system is to be incorporated into the design. Impact upon water and wastewater infrastructure are all dealt with in the following reports:

### **Sustainability Statement, Version 2** (Hold down 'Ctrl' and click to view)

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599954/file/document?inline>

### **Completed Water Efficiency Calculation** (Hold down 'Ctrl' and click to view)

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497430/file/document?inline>

h. No specific transport assessment has been requested.

k. Construction odour, fumes and dust will be dealt with by the Construction Management Plan.



**m.** No contamination report has been requested. During the excavation of the 4 boreholes, 3 trail pits and the subsequent laboratory examination of the spoil for the BIA; no evidence of contaminants was seen.

**We believe that the application complies fully with all the relevant elements of Policy A1.**

## **Policy A3 Biodiversity**

### **Trees and vegetation, Ecological surveys**

We submitted an Ecological Appraisal with the application which made a limited number of recommendations but otherwise concluded that:

**'6.5.1** Assuming that the precautionary methods described in Section 5 can be adhered to, it is concluded that there are unlikely to be any significant long-term ecological impacts resulting from the proposed development...'

### **Preliminary Ecological Appraisal**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497456/file/document?inline>

### **Trees and vegetation**

Only one garden bay tree currently exists on the site. No TPO is in place or is applicable.

### **Replacement and additional planting**

The proposed development incorporates a green roof, a green wall along the full length of the boundary wall to the rear of the property and substitutes an almost identical area of permeable landscaped garden to that which currently exists. We submitted a Tree Survey with the application; it concluded with no particular recommendations. It states that the young to mature poplar trees on the railway banking have "no implications" for the development.

### **Tree Survey BS 5837**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497411/file/document?inline>

**The application complies with the relevant elements of Policy A3.**

## **Policy A4 Noise and vibration**

### **Acoustic reports, Internal noise levels and vibration**

The finished development would produce no mechanical noise and vibration. Construction noise and vibration are dealt with by the Construction Management Plan. Concerning the impact of railway and road noise on the apartments themselves, we submitted a full Noise and Vibration Survey with the application. Noise and vibration levels were found to be within perfectly acceptable limits. Please see:

### **Noise and Vibration Assessment**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497450/file/document?inline>

### **Delivery management**

Officers have expressed no particular concern concerning delivery management. However, the development incorporates private parcel lockers into its lobby which can be accessed from the street 24/7. The lockers will significantly reduce the need for postal workers and delivery drivers to access secure areas of the property.

**The application complies with Policy A4.**

## Policy A5 Basements

The proposal involves a one-story basement averaging 2.7m. The Basement issues were all dealt with in great detail by the BIA. A subsequent BIA Audit by Campbell Reith was fully approved.

### **BIA Audit (final) 18/08/2017**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6759433/file/document?inline>

### **Cumulative impact**

Currently, the only other basements nearby are at No.1 Dornfell Street, 50m distant, and at The Alliance Public House on Mill Lane, some 80m away.

### **Demolition and construction**

A Draft Construction Management Plan accompanied the application.

### **Construction Management Plan, 1st Draft:**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497431/file/document?inline>

### **Size of basements**

The total area of the permeable garden area in the proposal is 1m<sup>2</sup> larger than it is at the moment. Rainwater harvesting measures will result in a 70% reduction in rainwater run-off. The BIA auditor, Campbell Reith, concluded that the basement should actually improve the hydrological environment around the site. To quote from the BIA Audit Report:

**5.7.** In the revised submissions, further assessment is presented and it is accepted that the proposed development is as very low risk of flooding from all sources.

**5.8.** An attenuation SUDS scheme is proposed that should provide an improvement on the current site conditions and betterment to the wider hydrological environment.

**5.9.** The proposed development will not impact the wider hydrogeological environment'

### **Basement Construction Plan**

These issues are all dealt with by the BIA and subsequent BIA Audit.

Please See: **Campbell Reith Consulting Engineers Basement Impact Assessment Final, August 2017**

### **Party Wall Act and security for expenses**

Currently the Party Wall Act is not within the remit of the planning process. It would be addressed in the normal course of events.

### **Flood risk**

We submitted the following reports with the application. They address all the relevant Flood Risk issues in detail. They reveal that there have been no historical problems with sewer flooding in Ravenshaw Street and that the probability of sewer flooding affecting the site in the future is very low.

Please see:

#### **Thames Water Utilities Ltd: History of Sewer Flooding**

The flooding records held by Thames Water indicate that there have been no incidents of flooding in the requested area as a result of surcharging public sewers.

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647038/file/document?inline>

#### **Flood Alleviation Project - Thames Water Letter & Map**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647045/file/document?inline>

#### **Flood Report – GroundSure**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647052/file/document?inline>

### **Protection of gardens and trees**

The development would lead to a significant reduction in rainwater run-off when compared to the existing site. The area of permeable topsoil in the proposed development is almost identical to the current site. The proposed development substitutes an almost identical area of permeable landscaped garden for that which currently exists.

We submitted a full Arboricultural Report with the application. It revealed that no tree protection measures were needed. Please see:

### **Tree Survey BS 5837**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497411/file/document?inline>

### **Listed buildings**

The existing property is not a listed building, near a listed building, in a conservation area or adjacent to a conservation area.

### **Lightwells**

A great deal of thought went into our approach to the front façade lightwells. The proposed building reads as a pair of contemporary, two storey houses with front gardens. While projecting its own distinctive character, we are very keen that it slots comfortably into the Victorian street scene. The basement level only becomes apparent when standing directly in front of the building; it has no effect on the street scene at all.

The interface between the development and the public realm is sympathetic and in keeping with the grain of the existing development, when seen from real-world vantage points. The primary design objective was to achieve the appearance of two regular front gardens, behind low walls and railings, typical of the street, ensuring that the presence of light wells would not disturb the broader street scene. We see this as having been successfully achieved. At the same time the design ensures sufficient daylight illumination to basement level habitable rooms. The basement flats, in the main, have exceptionally high ceilings and large external patio doors front and back to offset any sense of confinement and to maximise daylight penetration.

Robust, deep, stainless-steel irrigated planters with evergreen shrubs would be employed to ensure that the appearance of front gardens is maintained throughout the year.

**The application complies with Policy A5.**

## 7. Design and Heritage

### Policy D1 Design

As listed below, our **Design and Access Statement** covered all of the issues raised by Policy D1.

- Current Use & History
- Exiting Site and House
- Site History
- Planning History
- Site Considerations
- Site Limitations and Advantages
- Plot Advantages
- Plot Disadvantages
- Street Scene
- Stepping of Ridge Height
- Roof Division
- Considering 21's Main View
- Considering No.25
- Proximity to the Railway
- Density & PTAL Level
- Flood Risk
- Proposed Development
- Communal Garden & Green Wall
- Materials & Details
- Brick Work
- Stone Work and Render
- Roof
- Facia and Guttering Details
- Fenestration
- Folding Patio Doors
- Bypass Storm Shutters
- Metalwork to Front Elevation
- Cladding, Balcony Balustrading
- Schedule of Accommodation
- Design Development History
- Pre-app. & Subsequent Changes
- Rear Facade Adjoining No.21
- General Layout Considerations
- Front Entrance Area Design
- Rear Exit, Plant & Utility Area
- Proposed Amenity & Balconies
- Private Basement Level Patios
- Communal Garden
- Views and Visual Impact
- Extant Views from 23 to 21
- Views from 21, 25 to No.23
- Impact on No.21A
- Impact on No.25
- Landscaping and Planting
- Front Planters
- Entrance Lobby & Parcel Boxes
- Refuse and Recycling
- Front Bicycle Storage
- Sustainability
- Photo Voltaic Solar Panels
- Solar PV
- Rainwater Run-Off
- Rainwater Harvesting
- Access
- Transport Links
- Inclusive Access

### Design and Access Statement

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

We had already addressed most of these issues in the pre-application design, to which your officers provided a very positive response.

**The pre-application advice was as follows (extract):**

### **Design**

*“The site sits on a bend in the street, and the Victorian part of the existing building on the site is narrower than its neighbours. There is a large gap between the building on the site and its neighbour to the south, which previously gave access to a working yard behind, but offers no particular visual benefit in the streetscape. The principle of filling in the gap between the houses is therefore considered acceptable.*

*At the front, the proposed building seeks to respond to the Victorian terrace context but in a contemporary, simplified form. The position of the building on the site reads as two houses, which suits the width of the overall site, and the height, elevation position, roof form, and stepping down of the building successfully responds to the street scene. It is not proposed to incorporate bays, but the window heights and proportions respond to the bay form, which is considered appropriate.*

*To the rear, the site widens considerably. In flat elevation the proposal appears rather bulky at the rear, but on plan, it is shown to follow the angle of the bend in the street and seeks to respond to the respective building lines on each side, forming a splayed rear elevation, which mitigates any perceived bulk. The rear of the site backs onto the railway line and is not readily visible from any public viewpoints.*

*The proposed materials palette is simple and restrained, with brickwork, a dark zinc roof, and dark PPC aluminium window frames and sliding louvred screens to the rear. The successful use of a sheet roof covering in this context (rather than e.g. slate) depends on its colour and finish – typical bright silver zinc is not considered appropriate here, but a darker shade and more matte finish may integrate successfully within the terrace. Supporting visual information which shows examples of the proposed palette (as viewed in the pre-app meeting) will be of use at application stage, but we would seek to condition a materials sample panel.*

*In conclusion, it is considered that the proposed approach to the site can be supported.”*

**Rob Tulloch, Senior Planning Officer, 13<sup>th</sup> February 2015**

*For Director of Culture and Environment.*

Please see the attached:

**'Pre-application Response.pdf'** and **'Pre-Application Drawings.pdf'**

As we have explained previously, we did not wish to put forward either a slavish pastiche of Victorian terraces or a design involving bulky rectangular bay windows, which risked being overly prominent in the street scene. Boxy bay windows are a standard response to Victorian infills, a typical example can be seen opposite at No. 22 Ravenshaw Street; just how successful some of these designs are is questionable. We took the view that we wanted to avoid adding any bulk to the façade, or including dormer windows unless it became absolutely necessary. It transpires that your DRP officers actually seem to want them, which came as a surprise.

You can see from our **Design and Access Statement, on Page 22**, that we had previously considered numerous approaches to the front façade.

Your Case Officer, and by implication Design Officer, supported our reasoning in their detailed advice. Your Design Review Panel officers disagree with them. The implication is that, as applicants, we are somehow expected to know the minds of the Design Review Panel better than the Senior Planning Officer (with 11 years' service at Camden) who provided the pre-application advice and then guided the application for almost a year.

### **7.3 The Council will welcome high-quality contemporary design which responds to its context...**

The application is a high-quality contemporary design that responds to its context. Although the surrounding terrace is predominantly Victorian the design of the individual parades is not uniform. Any uniformity is further broken up by an eclectic mix of detailing, various configurations of bay window, single window dormers with pitched roofs, double dormers with flat roofs, a solitary turret at number 25 and a peppering of Velux windows. The Victorian terrace opposite is interrupted by the presence of the new build at No.22 Ravenshaw Street; the completion of which, in 2006, was not marked by widescale public revolt.



## Sustainable design and durability

### **Design and Access Statement - Section 8. Sustainability**

The proposal benefits for 20% on-site renewable energy; provided by 41 SunPower X21-345w panels. Rainwater harvested from 243m<sup>2</sup> of the site's impermeable surface area would be stored in a 7500 Litre tank for use in WC's and garden irrigation.

### **Design and Access Statement: 8.2 Solar PV: On-Site Batteries or FIT**

The proposed development would feature an on-site battery storage system. This will maximise on-site renewable energy use as opposed to the far less efficient route of feeding surplus power into the grid (FIT).

### **8.3 Rainwater: Run-Off and Harvesting**

The development increases the permeable area on the site by 5% and due to the rainwater harvesting system, decreases the area subject to rainwater run-off from 381.13 m<sup>2</sup> to 112.65 m<sup>2</sup>; a 70% reduction.

### **Design & Access Statement**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

### **Energy Statement Version 2**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599950/file/document?inline>

### **Sustainability Statement - Version 2**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599954/file/document?inline>

## Details and materials

The **Design and Access Statement** goes into great detail about our material choices:

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

Again, this is a highly subjective area, open to wide interpretation. Your officer's pre-application view of our material choices was positive and reads as follows:

### ***Design (materials)***

*“The proposed materials palette is simple and restrained, with brickwork, a dark zinc roof, and dark PPC aluminium window frames and sliding louvred screens to the rear. The successful use of a sheet roof covering in this context (rather than e.g. slate) depends on its colour and finish – typical bright silver zinc is not considered appropriate here, but a darker shade and more matte finish may integrate successfully within the terrace. Supporting visual information which shows examples of the proposed palette (as viewed in the pre-app meeting) will be of use at application stage, but we would seek to condition a materials sample panel.”*

***Rob Tulloch, Senior Planning Officer, 13<sup>th</sup> February 2015***

*For Director of Culture and Environment.*

## Street frontages and legibility

A great deal of thought went into our approach to the front façade, as can be seen on P.22 of our Design and Access Statement. We were very keen to confirm with your officers at the pre-application stage that a contemporary approach would be acceptable; detailed illustrations, drawings, explanations and photos illustrated our intentions. Having been given assurances that such a design would be acceptable, we proceeded with the application based on those assurances.

*“In conclusion, it is considered that the proposed approach to the site can be supported.” RT Pre app. advice.*

The building reads as a pair of contemporary, two storey houses with front gardens. The interface between the development and the public realm is sympathetic to, and in keeping with, the grain of existing development while not mimicking it. At ground floor level the primary design objective was to achieve the appearance of two ordinary front gardens, behind low walls and railings, all typical of the street. We were keen to ensure that the light-wells would be fully concealed from view, so as not disturb the broader street scene; this has been successfully achieved.

In our view, (and, to our knowledge) that of the case officer, and least one of the DRP officers, while perhaps not being to everyone’s taste, the design is not regarded as harmful.

Consequently, while arguments may rage about whether or not the minimalist contemporary design is quite everyone’s cup of tea; there seems to be something of a consensus amongst your officers that the design is not actually harmful.

**If it is not materially harmful, the application should, in our view, be regarded as being sufficiently compliant with Policy D1 to support approval.**

## Access

A Design and Access Statement accompanied the application. It shows how the specific needs of disabled people have been fully integrated into the proposed development.

- Access from the street to entrance bridge is perfectly level, in spite of the street slope.
- Access into the building's lobby is perfectly level with wide entrance doors.
- An inclined platform lift to all the floors along with ample corridor widths ensures that the development will be 100% wheelchair accessible.
- Currently, access to 23A, although on the ground floor, is stepped. Access to 23B is via a flight five external concrete steps. Internally 23B, which is a maisonette, has two long flights of internal stairs between habitable rooms and no direct access to external amenity. The proposed development would represent a considerable improvement in access standards over the existing property.

### **Design & Access Statement**

See Page 51: 9.2 Inclusive Access to the Property

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

## Health

- All the proposed apartments would have their own private amenity as well as access to a communal garden area. The communal garden, while not large, will be carefully planned and furnished and provide a welcoming and functional recreation area for residents to spend time in; perhaps for kids to play, to have friends round for a BBQ or just to sit out and read a book on a sunny day.
- Each apartment would be fitted with a Heat Recovery System.
- Each has the required amount of bicycle storage provision.
- All the upper apartments would benefit from an abundance of natural light – hence the external shutters. Basement apartments feature high ceilings, floor-to-ceiling patio doors and windows. Large internal lights in the basement flats would allow for as much natural light penetration into the core of those flats as possible.
- All windows are double or triple glazed. The upper south-west facing rear windows would incorporate Solar Control Glass to minimise overheating.

## Secure design and crime prevention through urban design

Please see the previous response to '**Policy C5 Safety and Security**'. The development would significantly increase natural surveillance to the front and rear of the site. While post and parcel boxes are directly accessible from the street, internal security is provided by secure interior glass doors and a building access control system. There is no internal access to or from the bin/bike store. Planning officers have not expressed any additional concerns and a formal Crime Impact Assessments has not been sought.

Please see **Design and Access Statement, Page 28**

- 3.6 Front Entrance Area Design

## Responding to natural features and preserving gardens and open space

### **Front façade. Bulk, Massing in Design.**

Please see Design and Access Statement: Pages 11-12

- 2.4 Front Elevation Considerations: Street Scene
- 2.5 Stepping of Ridge Heights
- 2.6 Roof Division

### **Front 'Garden' design considerations**

Please see Design and Access Statement: Page 39, 6.1 Front 'Garden' Planters.

### **Rear elevation considerations**

Please see Design and Access Statement: Pages 13-16 and 24:

- 2.7 Considering No.21's Main View
- 2.8 Considering No.25
- 2.9 Proximity to the Railway
- 3.4 Rear Facade Adjoining No.21

### **Rear gardens considerations**

Please see Design and Access Statement 30-38 and 40

- 4.0 Proposed Amenity
- 4.1 Private Balconies
- 4.2 Private Basement Level Patios
- 4.3 Communal Garden
- 5.0 Views and Visual Impact
- 5.1 Extant Views from No.23 to No.21
- 5.2 Views from No.21 and No.25 towards No.23
- 5.3 Impact on 21A
- 5.4 Impact on No.25
- 6.2 Rear Communal Garden & Green Wall

## **Landscape Design and Greening**

The development would replace the same area of permeable planted garden as currently exists on site.

Please see **Design and Access Statement: Page 24:**

- 6.2 Rear Communal Garden & Green Wall

## **Amenity Space**

Please see **Design and Access Statement 30-38 and 40**

- 4.0 Proposed Amenity
- 4.1 Private Balconies
- 4.2 Private Basement Level Patios
- 4.3 Communal Garden

## **Design of Housing**

The apartments are all self-contained. Each has its own, secure, private entrance. All have good ceiling heights and room sizes that conform to the government's nationally described space standards. All apartments are dual aspect and would have excellent natural light and ventilation. As well as mechanical ventilation and heat recovery they would be well insulated from noise and vibration. As well as all the apartments having access to their own balcony or terrace, they would all have access to a communal garden area at the rear. Due to the building having level access to the street, and a platform left to each of the apartments, the development would be accessible and adaptable to a range of occupiers.

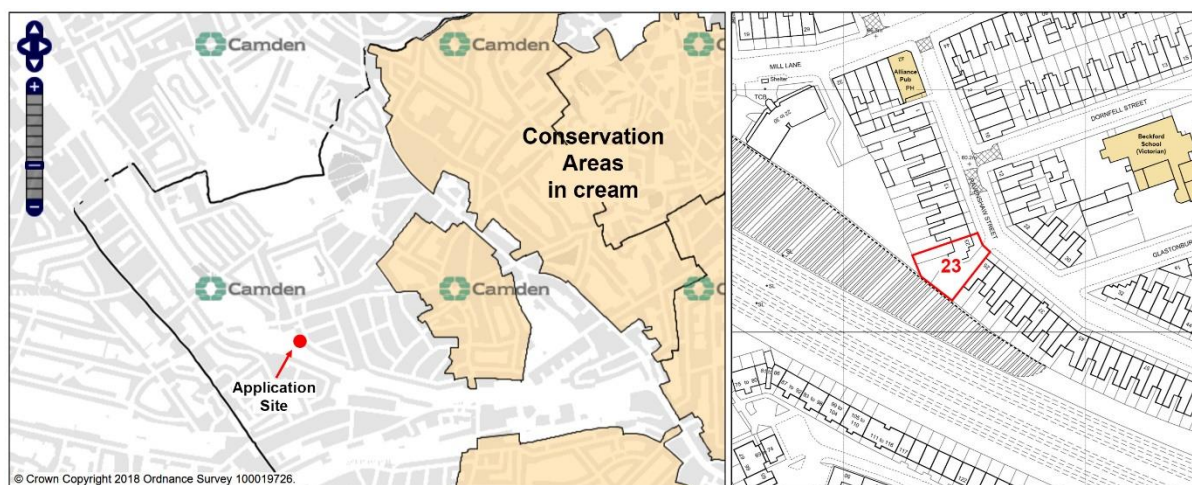
The development meets the government's nationally described space standards as set out in London Plan Table 3.3 and the Mayor's Housing Supplementary Planning Guidance.

## **Building services equipment**

All of the buildings' service equipment, heating, ventilation and extraction systems, ancillary plant and ducting would be contained within the envelope of a building or would be located in a visually inconspicuous position.

**We see no reason why the application should not be regarded as, at least, sufficiently compliant with Policy D1 to warrant approval.**

## Policy D2 Heritage



**Above:** Maps showing the closest conservation areas (left) and designated heritage assets (right).

The application site is of no known archaeological significance; it is not in a conservation area, it is not listed, is not a heritage asset, a non-designated heritage asset or near to a heritage asset. The closest heritage assets are Beckford School and The Alliance pub; marked in yellow on the right-hand map above; both are over 100m away from the site and the proposed development, and once completed it will have no impact on them at all. The impact of constriction on the assets is addressed in the Construction Management Plan.

**The application complies, where relevant, with Policy D2.**



## 8. Sustainability and climate change

### Policy CC1 Climate change mitigation

#### Resource efficiency, demolition and retrofitting existing buildings

**‘Why demolish a perfectly good house?’:** After weighing up all the realistic alternatives, we decided to redevelop the site as a whole. Maximising the potential of the site, of necessity, involves replacing the existing house. Please see the following application submissions that deal specifically with these aspects of the application:

#### **Sustainability: Demolition vs. Retrofit**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599951/file/document?inline>

#### **Building Retention vs Replacement Statement**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599953/file/document?inline>

#### **Embodied carbon**

Officers put the following question to us:

*“The development will result in the demolition of an existing Victorian terraced house. Policies prioritise the reuse of existing buildings over demolition and rebuild, due to the embodied carbon impacts. Although the development is recycling demolition materials, the applicant should provide justification for the demolition of the existing building over retrofit. SWMP proposed.”*

Please see the following application submissions that deal with this question:

#### **Embodied Carbon Response**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599951/file/document?inline>

#### **Building Retention vs Replacement Statement**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599953/file/document?inline>

## **Decentralised energy generation**

Energy and Sustainability Statements were submitted with the application. Some details were revised at your officer's request and the reports re-submitted. To our understanding they are now deemed to be acceptable:

### **Energy Statement Version 2**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599950/file/document?inline>

### **Sustainability Statement Version 2**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599954/file/document?inline>

### **Roof Plan Version 2, Showing Green Roof**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599982/file/document?inline>

Please also see:

### **Misc. Details- Intensive Green Roof, Overheating Risk, Slot Drain Detail**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647028/file/document?inline>

- A:** Constraints against the use of an intensive green roof
- B:** Solar Control Glass on vulnerable glazed areas
- C:** Front entrance threshold slot drain

### **Design & Access Statement**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

- 8.1** Photo Voltaic Solar Panels
- 8.2** Solar PV: Use on-site or FIT
- 8.3** Rainwater, Run-Off and Harvesting

If no further requests for changes or clarifications to our Energy and Sustainability Statements are forthcoming, then **the application complies with all the relevant elements of Policy CC1.**

## **Policy CC2 Adapting to climate change**

Sustainable design and construction measures, **Climate change adaptation measures**, Sustainable drainage and biodiversity

The development incorporates 1m<sup>2</sup> more permeable area than the existing site. The proposed development includes a green roof, a green wall to the rear and a comprehensive rainwater harvesting system, resulting in a radical reduction in runoff.

Please See: **Design & Access Statement**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

### **8.3 Rainwater, Run-Off and Harvesting**

Urban heat island

The development does not incorporate air conditioning. Each flat would benefit of its own Mechanical Heat Recovery System.

#### **Cooling**

We submitted an Energy Statement with the application, subsequently amended at the request of officers. No further amendments were requested.

The development will not incorporate air conditioning. Each flat will instead have a Mechanical Heat Recovery System; while large windows encourage maximum airflow front to back. No thermal modelling has been asked for.

An Energy Statement was submitted with the application which details our response to these issues.

#### **Sustainable design and construction measures**

We submitted Energy and Sustainability Statements with the application. They detail our responses to these issues.

#### **Other assessment measures**

Home Quality Mark is not a policy requirement, but we are happy to consider it in due course.

## **Summary: Policy CC2 Adapting to climate change**

We submitted an Energy Statement and a Sustainability Statement with the application which were subsequently amended at the request of officers. No further amendments were requested.

### **Energy Statement Version 2**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599950/file/document?inline>

### **Sustainability Statement Version 2**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599954/file/document?inline>

### **Roof Plan Version 2 Showing Green Roof**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599982/file/document?inline>

See also:

### **Misc. Details: Intensive Green Roof, Overheating Risk, Slot Drain Detail**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647028/file/document?inline>

**A:** Constraints against the use of an intensive green roof

**B:** Solar Control Glass on vulnerable glazed areas

**C:** Front entrance threshold slot drain

### **Design & Access Statement**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

**8.1** Photo Voltaic Solar Panels

**8.2** Solar PV: Use on-site or FIT

**8.3** Rainwater, Run-Off and Harvesting

No any further requests for changes or clarifications to our Energy and Sustainability Statements have been forthcoming, therefore:

**The application complies with all the relevant elements of Policy CC2.**

## **Policy CC3 Water and flooding**

### **Water supply and quality Drainage hierarchy**

The development incorporates 1m<sup>2</sup> more permeable area than the existing site, a green roof, a rainwater harvesting system, resulting in a radical reduction in runoff, and water efficient fittings and appliances.

### **Sustainability Statement Version 2**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599954/file/document?inline>

### **Design and Access Statement**

8.3 Rainwater: Run-Off and Harvesting

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

### **Completed Water Efficiency Calculation**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497430/file/document?inline>

**Areas at risk of flooding, Site-specific Flood Risk Assessments, Mitigating flood risk and Vulnerable development:** We submitted the following reports with the application. They address all the flooding issues in considerable detail:

### **Thames Water Utilities Ltd: History of Sewer Flooding**

The flooding records held by Thames Water indicate that there have been no incidents of flooding in the area as a result of surcharging public sewers.

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647038/file/document?inline>

### **Flood Alleviation Project: Thames Water Letter & Map**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647045/file/document?inline>

### **Flood Report GroundSure**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647052/file/document?inline>

**The application complies with all the relevant elements of Policy CC3.**

## **Policy CC4 Air quality**

### **Air Quality Assessments, Effect of development on air quality, Construction and demolition.**

We submitted a draft Construction Management plan with the application. The site is not regarded as a high-risk site. Existing modelled concentration maps predict pollutant concentrations below the air quality objectives. It concludes that air quality conditions for new residents would be acceptable and that there should be no constraints to development in respect to air quality.

#### **Construction Management Plan, 1st Draft**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497431/file/document?inline>

#### **Air Quality Assessment**

Air Quality Assessments Ltd. assessed the air quality impacts associated with the development. Please see their report:

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497413/file/document?inline>

**Transport:** The development is 100% car-free.

**The application complies with all the relevant elements of Policy CC4.**

## **Policy CC5 Waste**

### **Facilities for storage and collection**

The waste storage and collection facilities to be provided within the development have been deemed acceptable by the case officer. Access to the bin store area from the street is level and unimpeded. The access door will swing both ways and incorporate a delayed self-closing mechanism to ensure that it isn't left open for long periods of time.

#### **Design and Access Statement 7.12 Refuse and Recycling**

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6497444/file/document?inline>

**Waste Management Plan:** No Waste Management Plan was requested.

**The application complies with Policy CC5.**

## 10. Transport

### Policy T1 Prioritising walking, cycling and public transport

#### Walking, Cycling

The development is 100% car-free, has no on-site parking provision and in the view of officers, would provide adequate cycle parking.

**The application complies with policy T1.**

### Policy T2 Parking and car-free development

#### Car-free in new developments

The development is 100% car-free, no on-street parking permits will be sought. Space for two new on-street parking spaces will be created due to the loss of the crossover; freeing up, in total, four on-street spaces.

**The application complies with policy T2.**

## 11. Delivery and monitoring

### Policy DM1 Delivery and monitoring

#### Planning contributions

We understand that for every head of term in the s106 we will be required to pay the Council's Processing and Monitoring Charge, charged at £365 per head of term:

- Car-capped housing
- Construction Management Plan
- Highways Contribution (Est. £5,000?)
- Post-Construction Sustainability Review/Energy Plan

**Planning Conditions and Materials:** We understand that officers will wish to condition, among other things a number of the materials to be used in the development, in particular:

- Roofing and Facia Materials
- Guttering and Downpipe Materials
- Brick Slips and Pointing Samples
- Front Wall Copping, Cap Stones?
- Steel Entrance Bridge, Detailed Design Drawings?
- Obscured Window, and Balcony glazing samples?
- Garden and Green Wall Planting Specifications and Schedules?

### **The Community Infrastructure Levy (CIL)**

The amount of CIL due has already been agreed with the case officer.

### **Mayor's CIL**

The amount of Mayoral CIL due has already been agreed with the case officer.

Delivery and monitoring agreements will form part of the s106.

**The application complies with policy DM1.**

## **12. Conclusion**

In our view, the application is fully in accordance with the Local Plan, as adopted on 3 July 2017, just as it was with the previous LDF.

For any further information you may require please contact the applicant:

Mr C S Taylor,  
23A Ravenshaw Street,  
London NW6 1NP  
Tel: 07739108695  
[chris.stuart.taylor@gmail.com](mailto:chris.stuart.taylor@gmail.com)

s106 and other legal matters will be undertaken by our Solicitor:

Ms Linda Felton Fortune Green Legal Practice,  
Golden Cross House,  
8 Duncannon Street,  
London WC2N 4JF  
Tel: 0207 484 5190  
[l.felton@fglp.co.uk](mailto:l.felton@fglp.co.uk)