

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

Response to the Design Review Panel's Comments

12/12/2018

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Introduction

This document addresses our case officer Mr Tulloch's email to us of 20th Oct. 2017. In his email, he sought to summarise the views expressed by his fellow officers in their internal Design Review Panel meeting, held on 17th Oct. 2017 as they are described in the minutes of the meeting sent to us after our Freedom of Information Act request (FOI10227) provided to us by your authority on 4 Dec. 2017.

Note about links: This document contains links to external reports.

Revised CGI's Front Elevation

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6647026/file/document?inline>

Front Elevation - Revised Materials

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599966/file/document?inline>

Front Elevation MM - Version 2 - Revised Façade

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/6599977/file/document?inline>

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

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

Revised Details - Cycle Ramp and Sheds

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

Roof Plan - Version 2 - Showing Green Roof

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

Detailed replies to each comment

Why no Dormers?

The reasons why we didn't equip the application design with dormer windows was that your officers had previously told us they didn't want them.

- During our previous application in 2007 (2007/0967/P) Case Officer Paul Wood and Design Officer Louise Drum made it very clear to us that front dormers would be strongly resisted no matter what.
- In 2006 I also had occasion to speak to the developer of No.22 Ravenshaw Street, the site directly opposite this one (2006/2388/P). He had been told that if he included dormers in his application, it would be refused. He reverted to Velux windows just to avoid conflict.

For these reasons and the fact that we did not want to add any unnecessary massing to the façade, we deliberately did not include dormer windows in the pre-app or application design. Officers accepted our explanation. Dormers were not mentioned again until the Design Panel Review meeting.



No.22 Ravenshaw Street: Contemporary new build - directly opposite the application site.

Front Facade Remarks

Our Design and Access Statement explains at length that we chose to implement a contemporary design which seeks to 'rhyme' with the existing architectural vernacular rather than just copy elements of it. Our design decisions were very deliberate and were accepted by the design officer as a perfectly supportable approach.

'...modern design out of keeping with the context of the street...'

About the proposed façade, officers remarked: *'Although there were no complaints about the height and scale, the modern design was considered to be out of keeping with the context of the street'*.

No.22 was an original Victorian house demolished by Camden in 2004. Site sold at auction. Current new build (right) completed in 2007.



Above: Illustration showing the proposed façade of No.23 (left), sitting opposite the contemporary new build at No.22 Ravenshaw Street (right).



Wide angle shots of the existing and proposed façades: Showing No.22, formerly a Victorian house owned by the authority demolished by L.B. Camden in 2004. Sold the at auction to a private developer. The current contemporary new build at No.22 was approved in 2006. **CGI's:** Please see before and after façade shots in 'Kuula' viewer here. **Click the link:** <https://kuula.co/post/7Yhny/collection/7l40n>

[the design is] 'not imaginative'

Not imaginative may be one view; restrained and practical may be another way to describe it. With all due respect to the officer, the design is not an application for the Stirling Prize. It is, however:

- A well-considered and perfectly viable response to the constraints of the site.
- A design that makes a virtue of the sites awkward shape, accommodates neighbouring properties well and makes very effective use of the sites open south-west facing aspect.
- Provides high-quality accommodation, while at the same time concealing around three-quarters of its rear massing from view.
- It does all this while presenting itself to the public realm as just two contemporary terrace houses.

We would argue that the building is an extremely imaginative, well thought out and accomplished design.

'context is slate rather than zinc.'

We deliberately chose a contemporary roofing material to create a visual distinction between the new development and Victorian terrace; as opposed to just aping the adjacent materials. See: Design and Access Statement P41-45. That said, if officers do see the standing seam roof as a real sticking point, we can put forward an alternative clay tile that would emulate the pattern and colour of slate while retaining a contemporary edge.



'building on site of higher quality architecturally..'

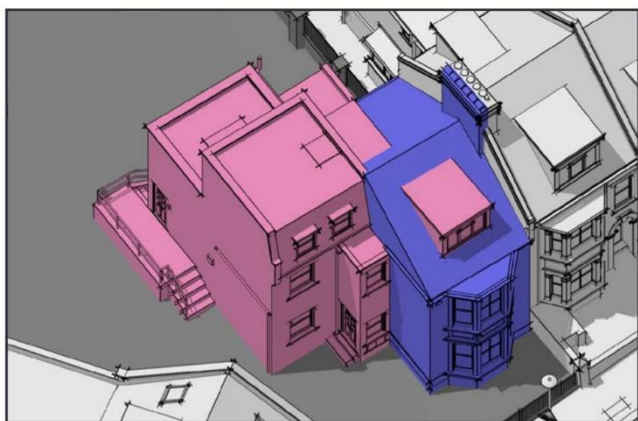


Fig 1: 64% of the building is ad-hoc later extensions - shown in pink.

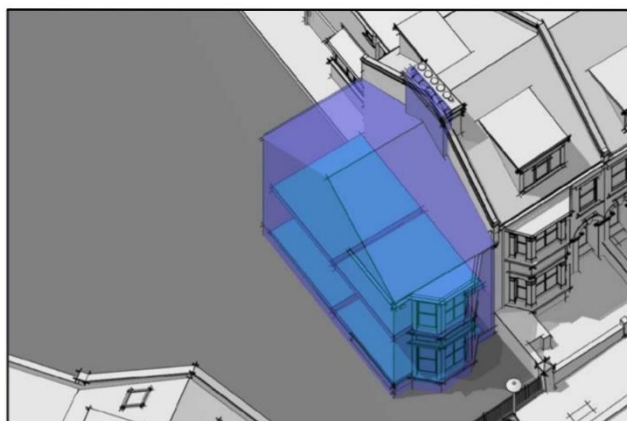


Fig 2: 36% is the original Victorian house, shown in blue; showing 60m² of floor space.

Many Victorian buildings make a significant heritage contribution to the built environment; but No.23 Ravenshaw Street is not a good example. The existing house is a very unremarkable building and makes a negligible historical contribution. The original Victorian house was a comparatively small and basic two-up and two-down, comprising of just 60m² GIA. We cover these arguments in detail in the following documents.

Sustainability: Demolition vs Retrofit

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

Building Retention vs Replacement Statement by NDM Heath Ltd

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

'Eave height is only thing contextual'.

The application's fenestration, entrances and the boundary treatment all step down rhythmically within the terrace context. All this is covered in our Design and Access Statement and reflected in the pre-app case officers comments. The existing buildings' eave and ridge heights that aren't actually all that contextual since it steps down too severely with respect to the neighbouring roof line of 17, 19 and 21.



Fig.1. Front elevation of extant site.



Fig.1 Front facade of proposed development.



Fig.3 View down the street showing visual rhythm of garden walls stepping down the hill.

Please see: **Design & Access Statement Page 11 - 2.4**

Miscellaneous remarks

Level Access: A full explanation is in our Design and Access Statement; Page 51-52.



General Amenity: Provision was regards as perfectly satisfactory.

See Design and Access Statement: 4.1 Private Balconies, 4.2 Private Basement Level Patios, 4.3 Communal Garden



Fig.1 Folding patio doors to balconies



Fig.1 Flat A, rear basement lightwell



Fig.2 Flat A, rear basement lightwell



Fig.1 Communal Garden and Screening Zones.

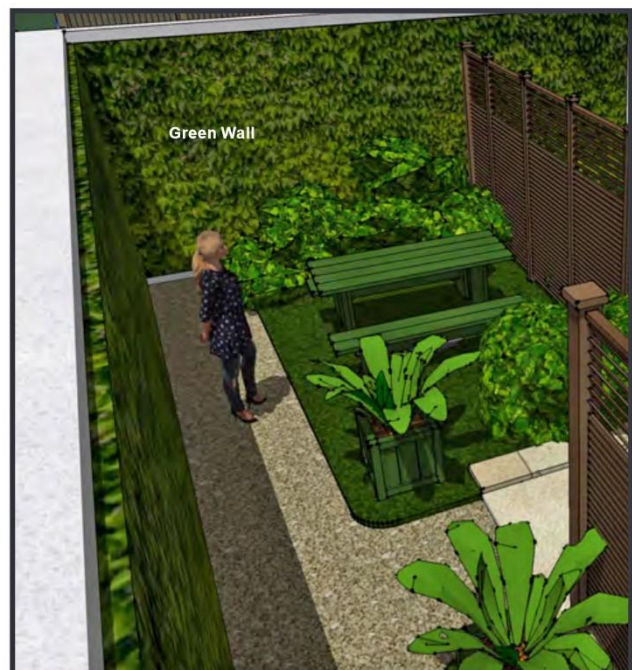


Fig.2 Garden Furniture will be provided.

Over-development

Design Review officers suggested that the development constitutes 'over-development'. They stated that the rear elevation was 'excessive', and that they had a 'general feeling' that too many units were being proposed. We would argue that the development does not constitute over-development in terms of:

- Current LP Policy, PTAL Levels vs. Site Area
- The Current London Plan
- The Draft London Plan
- The New NPPF
- Neighbouring Property Densities
- Case Officers views
- The visual impact of the Front façade
- Impact at the rear to the West / South West
- Impact at the rear on amenity to the South West

Current Policy, PTAL levels vs. Site area

We submitted a site-specific PTAL Level 3 assessment with the original application. Increased train frequencies have since changed matters. A new assessment from Transport Planning Practice Ltd (attached) shows that the site is now PTAL Level 4.

The application's density is as follows:

Site Area = 484.1m^2 / 8 Units / Units per Hectare = 165 u/ha

	(PTAL) 0 to 1	(PTAL) 2 to 3	(PTAL) 4 to 6
Urban	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha

At 165 u/ha / PTAL Level 4, set against the London Plan Density Matrix, the proposal appears to be just about optimal for the site and in no way over-development.

The Current London Plan

The phrases 'High' or 'Higher Density' appear at least 34 times in the current London Plan. The word 'optimum' also appears frequently too; 'optimum development, the optimum potential of the site, optimum use of the resources, optimum efficiency, optimum density. The application density is 'optimum' for the site area and as such is in complete accordance with current London Plan.

The Draft London Plan

The London Plan refers to either '*efficient*' or '*best use of land*' 37 times. The application is a well thought out and highly efficient design that utilises the potential of the site to its maximum, with minimum impact. Just what the plan asks for.

The New NPPF

It is clear what the new NPPF requires in terms of density and land use efficiency. It is clear that only the most robust argument against an application on the grounds of over-development will suffice to satisfy the requirements of the NPPF.

Comparison with neighbouring properties

The proposed development is comparable in terms of density vs plots site to neighbouring property*.

Density of 12-20 Ravenshaw Street**:

Site Area: 531m² / 7 Units: 131 u/ha

29 Habitable Rooms (exc. Kitchens) Per Hectare: 546hr/ha

Density of Proposed Development:

Site Area: 484.1 m² / 8 Units: 165 u/ha

28 Habitable Rooms (exc. Kitchens) / Habitable Rooms Per Hectare: 578hr/ha

See attached PDF: **Site Area and Density Comparison 2017-0911-P.pdf*

***Estimates derived from former planning application plans of neighbouring properties, details available on request.*

Planning Officers' Views

We have been told directly by two case officers, on two separate occasions that they did not consider this level of development to be over-development.

Paul Wood: Our 2007 application (2007/0967/P) meeting with Case Officer Paul Wood and Design Officer Louise Drum, I asked Mr Wood if he considered the development to be over-development". The application was for 12 units; 4 stories plus basement with parking for six cars, GIA 777m²; a substantially larger building than this one. He said "No".

Rob Tulloch: In the Pre-Application meeting for this application on 16/01/2015 we asked Mr Tulloch: "Do you consider the development to be over-development?". He replied "No".

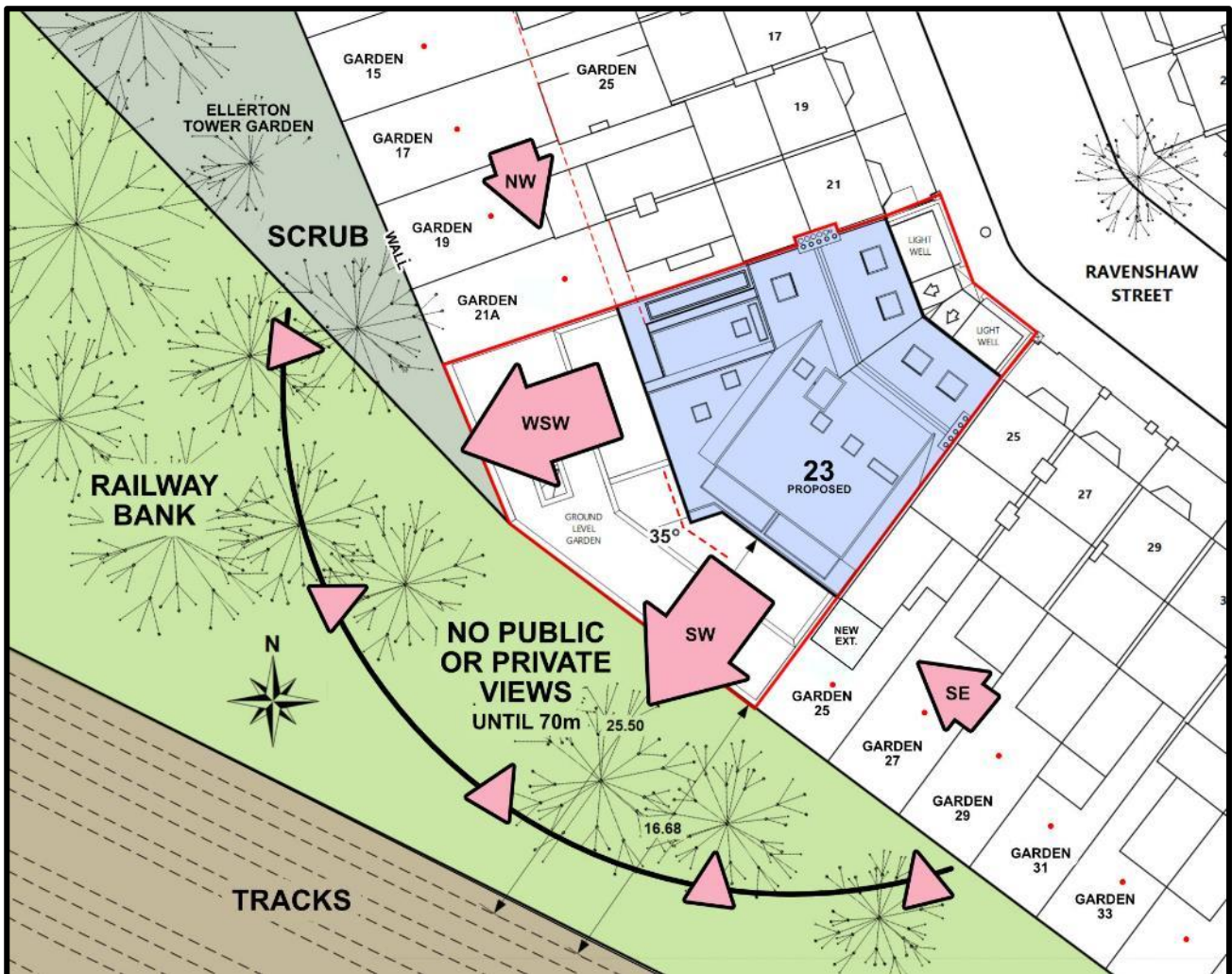
Rear façade impact

There are only three directions from which the rear elevation can be seen:

- NNW, which so far seems not to be an issue, so will not be addressed here.
- SW, which entirely faces the railway banking.
- SE, from where the rear of the rear is least visible aside from the mansard.

Impact to the West/South West and South West

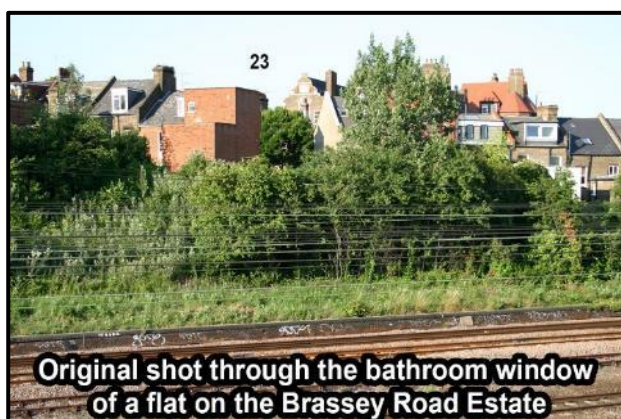
The bulk and massing presented in the rear CAD elevation can not be seen from any public or private viewpoint. The views shown in the CAD elevations faces only the railway bank. Very little of the rear elevation could ever be seen at all from the public realm and private real views are very restricted.



Above: The impact of the two rear facades is all directed towards the railway banking. Only glancing views over walls are possible from gardens to NW and SE.



Above: Sectional CAD view is not demonstrative of actual visibility, impact or harm.



Above: CGI from 70 meters showing the rear façade a bathroom window across the railway, heavily obscured by the bank and trees.

Left: Original shot from the bathroom window of a flat on Brassey Road.

Actual impact on amenity to the South East

We have prepared a set of CGI's panoramas that show, real world, eye-level views from all the rear gardens to the south of the development.

Click the links below: to view the images in your Web Browser, then follow the instructions in the images annotations.

Garden of No.15	https://kuula.co/post/7Y4XP/collection/7fBRg
Garden of No.17	https://kuula.co/post/7PZ7H/collection/7fBRg
Garden of No.19	https://kuula.co/post/7PZ76/collection/7fBRg
Garden of No.21	https://kuula.co/post/7PZGM/collection/7fBRg
Garden of No.25	https://kuula.co/post/7PZY5/collection/7fBRg
Garden of No.27	https://kuula.co/post/7PZY0/collection/7fBRg
Garden of No.29	https://kuula.co/post/7PZZj/collection/7fBRg
Garden of No.31	https://kuula.co/post/7PZZW/collection/7fBRg
Garden of No.33	https://kuula.co/post/7PZZS/collection/7fBRg
Garden of No.35	https://kuula.co/post/7PZ1L/collection/7fBRg

The panoramas show that the mansard is mainly visible, not from the adjacent houses at No.25 and No.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 in the panoramas are to the centre of the solar panels.



25A Ravenshaw Street: Rear Garden View

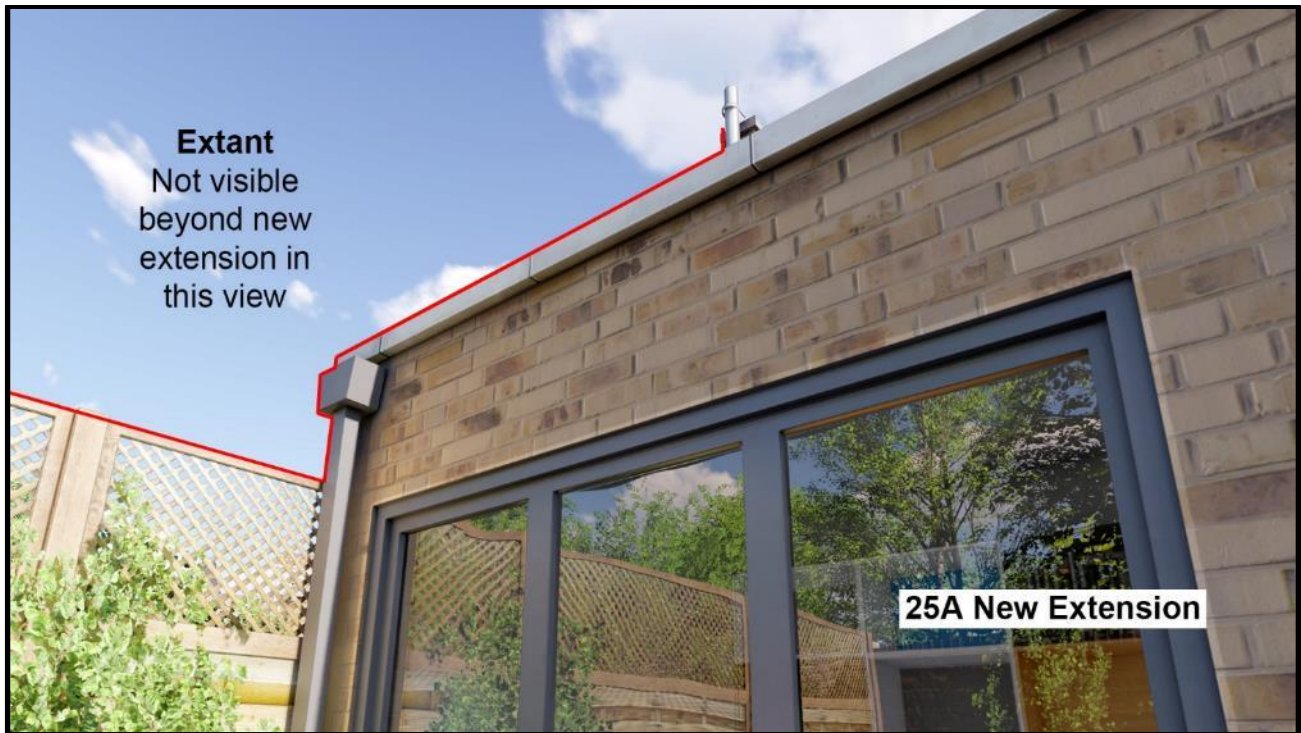


Extant: at the time of the original application



Proposed: at the time of the original application

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



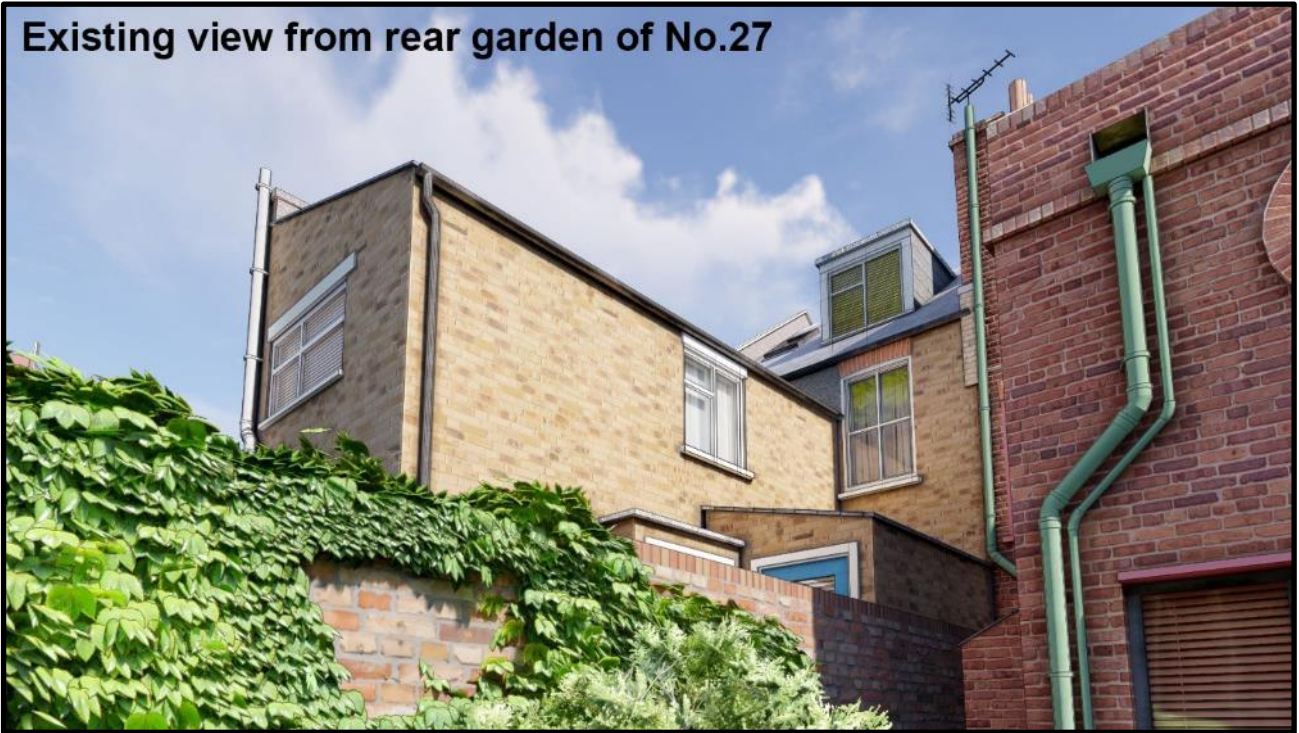
Extant: including the new extension now under construction Nov. 2018



Proposed: including the new extension now under construction Nov. 2018

27 Ravenshaw Street: Rear Garden View

Existing view from rear garden of No.27



Click: <https://kuula.co/post/7PZY0/collection/7fBRg>

Proposed view from rear garden of No.27



Click: <https://kuula.co/post/7PZY0/collection/7fBRg>

29 Ravenshaw Street: Rear Garden View



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



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

31 Ravenshaw Street: Rear Garden View



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



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

33 Ravenshaw Street: Rear Garden View



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

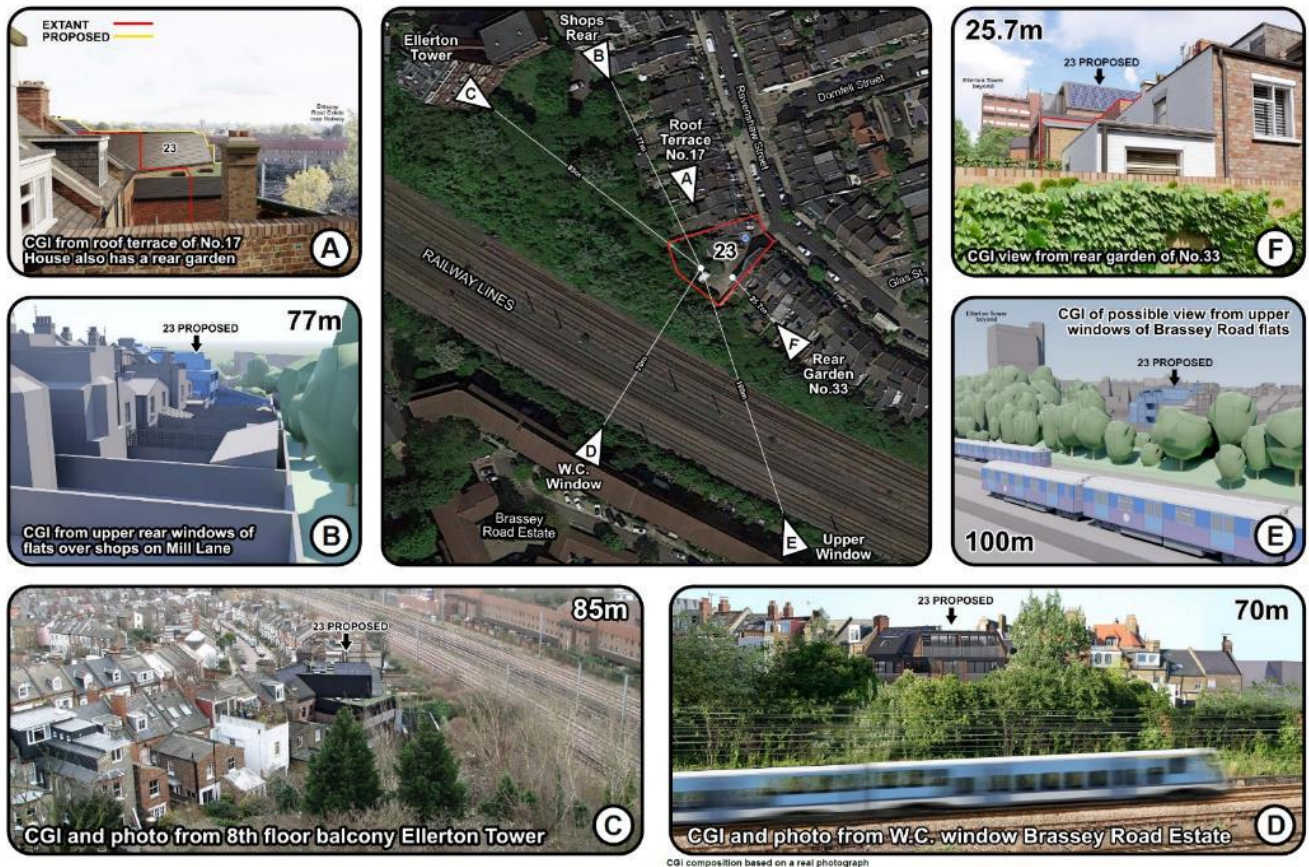


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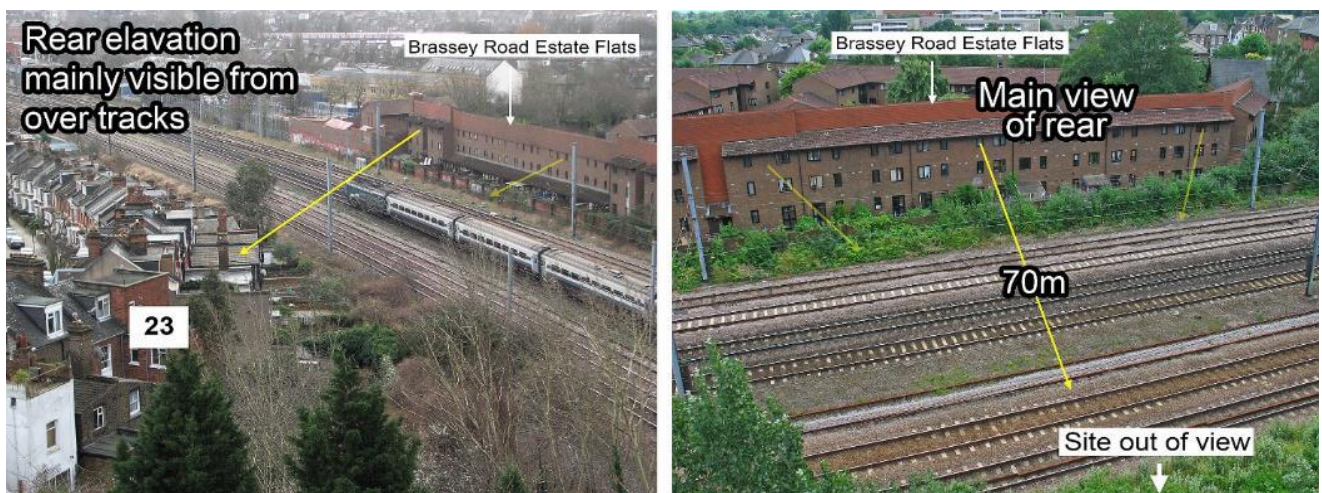
Rear: Distant private realm views are restricted

Rear Elevation: Wider Private Realm Views

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2017/0911/P



Please see: **Rear Elevation - Wider Private Realm Views 2017-0911-P.pdf**



The rear elevation is only visible face-on, then only the upper floors, from windows overlooking the railway on the Brassey Road Estate 70m away.

Rear: Virtually no public realm views possible

Rear Elevation: Only Public Realm Vantage Points

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



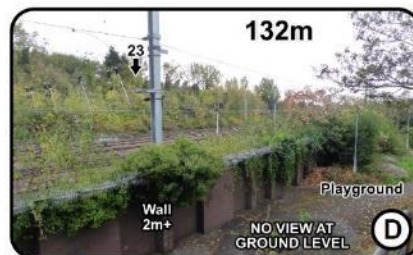
Gap beside Ellerton Tower on Mill Lane.



View over the 1.75m Mill Lane Railway Bridge Wall



View through a gap in the fence at Mill Lane Bridge



View from 5m playground hill on Wayne Kirham Way



View from Maygrove Peace Park from 226m

See: [Rear Elevation - Only Public Realm Vantage Points 2017-0911-P.pdf](#)

Rear Elevation: Size and Impact Summary

The design ensures that around only around 25% of the rear façade is even visible from any single rear garden; the majority of those views are oblique. Overall, 50% of the entire building mass is below the garden wall line; and 50% of that, is hidden beyond the apex of the 35° corner. From any rear garden, around 75% of the building is hidden from view.

Consultation: Local objection to the application

Local opinion was very well canvassed. In addition to the Statutory notice, a local resident posted flyers to every house in the locale on two separate occasions. Just four responses received during the consultation period. A total of 14* responses were submitted in total. Concerns about construction activity are dealt with in the Draft CMP and BIA Audit; which was fully approved. While a small minority do have

perfectly understandable concerns, the consultation responses indicate that the overwhelming majority of neighbouring residents were little troubled by the proposal. We hope this is communicated to decision makers.

**16 responses are listed, 2 are duplicates.*

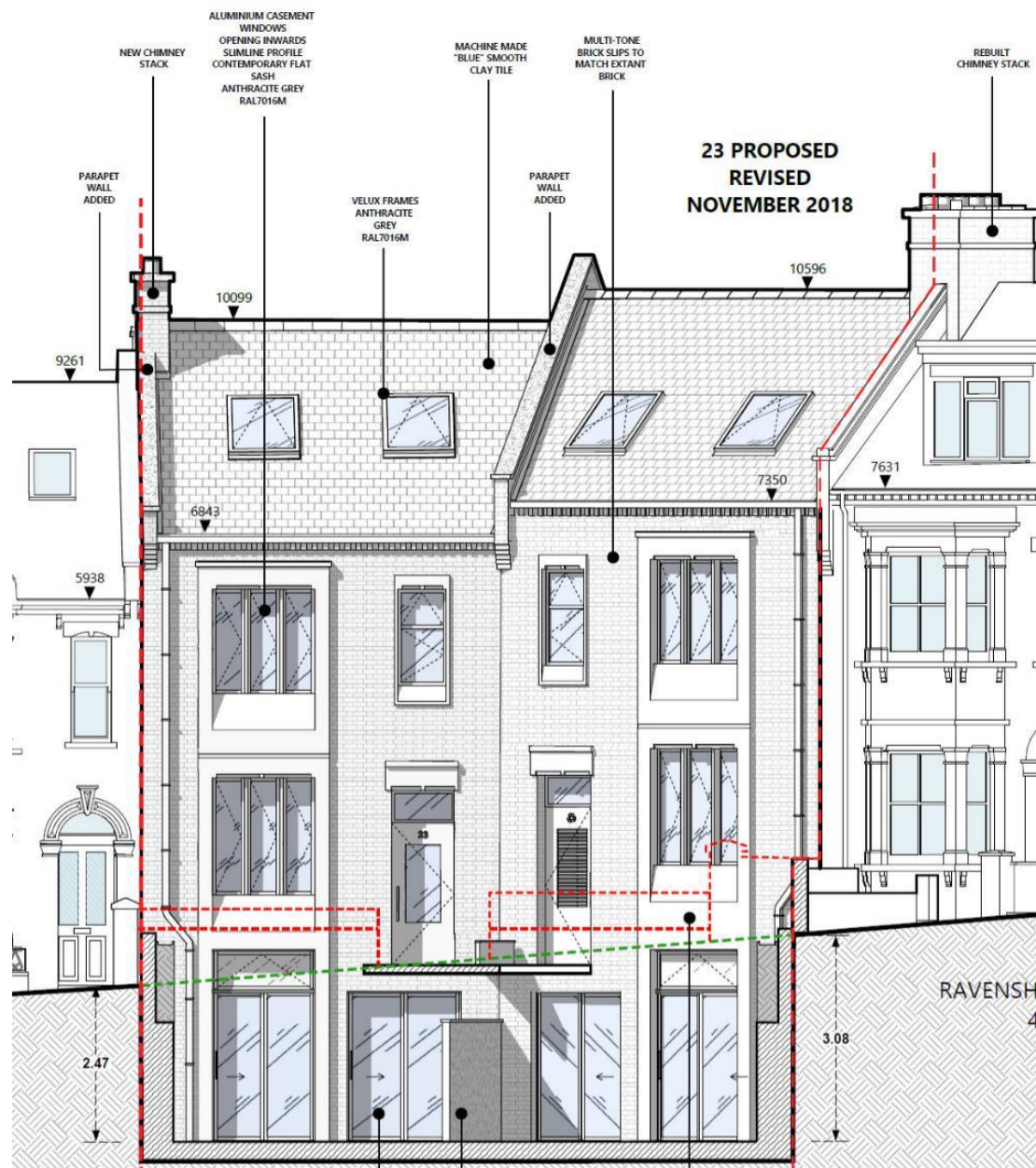
Revised façade

In light of your officer's views, accompanying this document is an alternative front façade treatment which takes a slightly different tack to achieve what is still a contemporary design. **These revisions do not render the application a 'substantially different' scheme.**



The design is now less assertively contemporary. We hope it will be regarded by officers as being more suitably 'residential' in the way its white render window surrounds now alludes more strongly to adjacent bay windows. Parapets are introduced, along with a smooth blue clay slate tiles, reflecting adjacent welsh slate, instead of the standing seam metal roof. These limited revisions are designed to tie the front façade into the existing street scene to a greater degree by responding more directly to the Victorian vernacular to either side.

Our original design approach sought to rhyme with, but not mimic, the adjacent Victorian geometry and to celebrate the Victorian colour pallet through the use of contemporary materials. We put the original design forward having been told that it would be supported. Your Design Review Panel officers did not support this original approach. However, we hope you can accept these revisions* as a viable and welcome response to your Design Review Panel's observations.



****Please see accompanying: 'Front Façade Revision V2.pdf'***

While the changes do alter the surface visual appearance they are purely cosmetic and very minor in the context of the scheme as a whole; and therefore not substantial material alterations to the application itself.

The revisions are:

Front Facade

- Grey façade panels swapped for a white render faux bay design - windows amended but virtually the same size and position.
- Entrances revised to match
- Two parapet walls
- Slate instead of standing seam roof

Rear Elevation

- Slate instead of standing seam roof

That's it. The rest of the application remains exactly the same.

Summary

The application was put forward in response to encouraging pre-application advice. We have since gone to considerable extra lengths to accommodate officers' requests. At a very late stage, after being told to expect an approval, we were told that we would be facing a refusal; due to issues not raised at the pre-application or at any stage during the eight months it took to process the application itself.

We have sought to address the DRP officers' concerns about the front façade design and the impact of the rear, in spite of them having been presented to us so very late in the day. Aside from those specific issues, in all other respects, the application is in general conformity with the Local Plan, London Plan and NPPF.

We ask officers to consider these amendments in the hope they may find themselves minded to reconsider their decision and move to recommend approval of this application.

Mr C S Taylor
Applicant