

**Date:** 13<sup>th</sup> February 2015  
**Our Ref:** 2014/7373/PRE  
**Contact: Rob Tulloch:** 020 7974 2516

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Dear Mr Reilly,

**Re: Planning Pre-application advice ref. 23 Ravenshaw Street, London, NW6 1NP**

Set out in the attached document is a detailed note of the principal issues discussed at the meeting and what you need to do in order to submit a valid planning application for your proposal.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the Council, you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

I trust the enclosed assessment is a fair representation of our discussion. Should you require any further information please contact me on the above telephone number.

Thank you for using Camden's pre-application advice service.

Yours sincerely

Rob Tulloch – Senior Planning Officer  
For Director of Culture and Environment

## **Site and Surrounding**

The proposal relates to a two storey house which has been extended and converted into 2x flats. The flats are adjacent to a large car park which was formerly a builder's yard and now forms part of the site.

The site lies at the bottom of the bend in Ravenshaw Street and backs on to the railway line. The area between the railway line and the site is a site of nature conservation importance. Ravenshaw Street, and the surrounding area, is predominantly residential. The site is not within a conservation area.

## **Proposal**

Demolition of the existing house and erection of three story plus basement level 8 unit apartment block comprising 4 x 3 bed units, 2 x 2 bed units and 2 x 1 bed units.

## **Planning History**

8905200 The erection of a single storey rear extension. Granted 11/10/1989

20351 Change of use to 2 self-contained dwelling units involving construction of a two storey extension at rear, a roof extension at the side and dormer windows. Granted 06/06/1975

5107 The erection of a concrete garage at the side. Granted 19/06/1968

## **Assessment**

The main issues of consideration are:

- Land use
- Design
- Residential development standards
- Amenity
- Sustainability
- Transport
- Other matters
- Community Infrastructure Levy

## **Land use**

Housing is regarded as the priority land-use of the Camden Local Development Framework. In line with policy DP2 (Making full use of Camden's capacity for housing) the provision of additional residential floorspace on the site is welcomed, but must also take into account accessibility, the character and built form of the surroundings, and protecting the amenity of occupiers and neighbours.

The proposed scheme indicates 8x flats over 800sqm of floorspace (GEA). As such, an affordable housing contribution would not be required as the site does not have the capacity to provide 10 or more dwellings ("Capacity" for ten units is considered to be 1000sqm or more of floorspace).

The Dwelling Size Priorities Table within Policy DP5 (Homes of different sizes) sets out Camden's priorities in relation to dwelling sizes. For market housing, two bedroom dwellings are a very high priority with 3 bedroom dwellings a medium priority and 1 bedroom dwellings a low priority.

The proposed scheme comprises 2x 1-bed units, 2x 2-bed units, and 4x 3-bed units. Therefore 25% of the units would be 2-bed, which is below the minimum target of 40% 2-bed units required by policy DP5. However, DP5 acknowledges that it will not be appropriate for every development to meet the aims set out in the Priorities Table and considers that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall. Due to the small number of units being provided, and as the proposal would also feature smaller units and family sized units, the mix is considered to be appropriate.

The proposed scheme would be in the mid-upper end of the density range of the London Plan which is in line with policy DP2 which advises that development should be towards the higher end of the appropriate density range.

## **Design**

The context of Ravenshaw Street is two storey late Victorian terraced houses. There is variety in the facing and roofing materials, some of which have been altered piecemeal, and in some of the elevational detailing, but unifying aspects can be found in the visible, steeply pitched roofs, and the use of one- or two- storey canted bays. The houses step down to follow the topography, and the rear of the site backs onto the railway line.

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 streetscene. 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.

### **Residential standards**

The proposed plans show 1-bedroom/2 person units of approximately 52sqm, 2-bedroom/4 person units of 72-74sqm and a 3-bed/5-6 person units of 85-113sqm. Flat F is shown as a 6 person/3-bed unit, but the floorspace of 87.6m would be below the 92-93sqm recommended by Camden and the London Plan. A 5-person unit, similar to Flat E, would comply with the relevant standards. The remainder of the proposed dwellings would comply with the minimum floorspace requirements of the supplementary planning guidance of both the London Plan and Camden (CPG2 – Housing) in terms of overall floorspace and bedroom size.

In line with policy DP6 (Lifetime Homes and wheelchair housing) all new residential development should meet all the Lifetime Homes standards. Any application will have to be accompanied by a Lifetime Homes statement.

The proposed plans show external amenity space in the form of rear gardens to the basement family sized units and reasonably sized balconies to the six upper floor flats. It is also proposed to provide 50sqm of communal garden at rear basement level which is welcomed.

12sqm of refuse storage is indicated at ground floor level. It has separate level access, but shares the space with post lockers and cycle storage and the applicant is advised to explore whether the refuse storage could be separate.

As the site backs on to railway lines, a noise and vibration assessment will be required. It is noted that one was submitted for a previously withdrawn scheme in 2007. However, British Standards have been revised since then, and train frequency is likely to have increased. As such, environmental health officers consider an up to date survey will be required to demonstrate that the proposal would meet current noise standards. Due to the proximity of the railway, it is also advised that an air quality assessment is submitted.

### **Amenity**

#### **Sunlight/Daylight**

The proposed building would largely abut the flank wall of no. 25 and extend no further to the rear than existing, however the top floor would rise above the closet wing and rear roof slope of its neighbour. There is a rooflight and small dormer in the roofslope of no. 25, although the centre of these windows would not fall within a 45° angle in elevation, it is considered that daylight to this property should be formally assessed. As there are no windows to no. 25 facing the site within 90° of due south, the proposed building is not considered to affect sunlight to this property.

No. 21 has ground and first floor windows facing the site, including a ground floor living room window. These windows already face one and two storey elements of the existing building and the proposed building steps back from the site to minimise the impact on these windows. However, whilst it is acknowledged that the ground floor element would be set further back from the boundary, it would extend deeper into the rear garden. At first floor level the rear of the proposed building would be closer to the boundary and extend further into the garden. As such a sunlight/ daylight assessment will be required to demonstrate that the proposed building will not have a harmful impact on sunlight or daylight to this property.

### Outlook

No windows to no. 25 directly face the proposed building so outlook to this property would not be affected. As mentioned, no 21 has windows at ground and first floor level facing, or perpendicular, to the proposed building. From the submitted information most of these are either to toilets or kitchens. A ground floor living room window faces the site, however this room appears to be dual aspect so the impact on outlook to this room is not considered to be significant.

### Overlooking

There would be no windows to the proposed building that would directly face neighbouring windows, and the majority of the rear fenestration would be beyond the rear building lines of neighbouring properties. The plans indicate obscure glazing to the two windows closest to the main rear elevation of no. 21 which would protect privacy. There would be overlooking of neighbouring gardens from the upper floors of the proposed development, but this would be angled views to the rear of the gardens and is not considered to be significantly different to the existing situation.

### Noise

In terms of noise, the terraces and balconies are not of a size that would be likely to generate adverse noise conditions.

### **Sustainability**

Under Core Strategy policy CS13 (Tackling climate change and promoting higher environmental standards) and policy DP22 (Promoting sustainable design and construction) of the Camden Development Policies, development will be expected to incorporate sustainable development principles into the design and implementation of development, including a target to achieve Code for Sustainable Homes Level 4 (Code Level 6 from 2016), with a minimum of 50% in the categories for energy, water and materials. As such, a Code for Sustainable Homes Pre-assessment will need to accompany any application and a post-construction review would be carried out as part of a Section 106 Agreement.

Camden would also seek to promote contributions to and the integration of local energy networks into development where possible. More detailed site feasibility work should assess the potential for the development to connect to and contribute towards local energy networks.

Developments should follow the London Mayor's Energy Hierarchy (namely 1. use less energy, 2. supply energy efficiently and 3. use renewable energy) to show that renewable energy is not just an 'add-on'.

Developments involving 5 or more dwellings and/or 500sq m (gross internal) floorspace or more are required to submit an energy statement which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy (please refer to Camden Planning Guidance CPG3 - Sustainability for more details on what to include in an energy statement)

It would also need to be ensured that any development limits the amount of run off and waste water entering the combined storm water and sewer network. All developments are expected to manage drainage and surface water on-site or as close to the site as possible, using Sustainable Drainage Systems (SUDS). No green roof is proposed as the roof is indicated as providing solar PV/hot water equipment. The lack of a green roof is considered acceptable in this instance given that soft landscaping on site would increase to 186sqm.

### **Transport & Construction**

The site ostensibly has a Public Transport Accessibility Level of 1b (very poor) however it is understood that this omits certain walkways to West Hampstead Stations. There is also indication of increased Thameslink services which could raise the level to 4 before 2018.

The site is within the Fortune Green Controlled Parking Zone (CA –P(c)). In line with policy DP18 (Parking standards and limiting the availability of car parking) the Council strongly encourages car free development. No on-site parking is proposed. It is indicated that one of the existing occupiers would retain a flat in the new development, as such they would be entitled to retain their parking privileges. Therefore the proposal would be car-capped, allowing one nominated unit the right to on-street parking, with the remaining units being car-free. This would be secured by a Section 106 Agreement.

Cycle parking should be designed to meet Camden's cycle parking design specifications as set out in Camden Planning Guidance (CPG 7 – Transport). In line with the Council's parking standards and the London Plan, the provision of cycle storage/parking for a three bedroom residential unit is 2 spaces, and 1 space for smaller units. As such, the proposal would require storage for 12x cycles. The proposed plans indicate cycle storage for 8x cycles at ground floor level in the form of Josta system. Such two tier systems are recommended by the Council, however the proposed storage does not provide enough floorspace for 12x cycles. Details of the Council's cycle parking standards can be found in CPG7.

A Construction Management Plan (CMP) will be necessary in order to demonstrate how the transport (and other) impacts of any construction process would be managed should a redevelopment scheme come forward. It is recommended that a draft CMP accompany any application, and a final version will be secured via a Section 106 agreement. A template for a draft construction management plan is attached, and further information can be found in section 8 of Camden Planning Guidance (CPG6 – Amenity).

The site has a crossover allowing access to the rear parking area. This would become redundant and allow the existing residents bay to be extended. A car club bay would not be supported. A financial contribution would be required to reinstate the footway in front of the site. This would be in the region of £5,000 and secured via a Section 106 agreement.

### **Basement Impact**

The scheme involves excavation to create a basement, as such the proposal would need to comply with policy DP27 (Basements and lightwells) and would require the submission of a Basement impact Assessment (BIA). The BIA needs to be compiled by a relevantly qualified engineer and address the criteria laid out in Camden Planning Guidance (CPG4 - Basements and lightwells).

The site is not within an area of constraint for land stability, surface water or groundwater. So there is no requirement for independent review of a BIA, however if expert objections are received from third parties the BIA will have to be reviewed by an independent assessor at the applicant's expense in line with CPG4.

### **Trees & Biodiversity**

There is one tree on site to be removed, and trees outside the site that could be affected by the proposed excavation. As such, an arboricultural report and method statement will be required to justify the removal of the tree and demonstrate that the proposal will not harm any adjacent trees.

The site also borders a site of nature conservation importance (West Hampstead Railsides Site of Borough Importance Grade I). As such, a habitat scoping survey will be required. Please refer to Camden Planning Guidance (CPG3 – Sustainability) for more information about ecological surveys. You should also refer to the biodiversity appendices (of CPG3) to see whether a protected species survey needs to be carried out. It may be that the scoping survey identifies something which triggers the requirement for a protected species survey as well.

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

#### Mayor's CIL

The Mayor of London's Community Infrastructure Levy is used to raise funds to contribute towards Crossrail. The CIL applies to all development which adds one or more dwellings or more than 100sqm of floorspace at a rate of £50 per sqm.

#### Camden's CIL

Camden has drafted its Community Infrastructure Levy charging schedule, which is likely to be introduced in March 2015. The proposed charges for development in the zone in which the site sits are currently:

<b>CIL Draft Charging Schedule: CIL Tariff per sq. m</b>	
<b>Type of Development</b>	<b>Zone B (Rest of Camden)</b>
<b>Residential below 10 dwellings</b>	<b>£500</b>

Once the schedule is adopted, The CIL rates are fixed and non-negotiable. The CIL regulations will scale back the scope of section 106 legal agreements, although developers will still be required to provide 'on-site' infrastructure needs through Section 106 obligations to mitigate the direct impact of development such as affordable housing and highways works contributions and other non-financial requirements. Only additional floorspace will be liable for a CIL contribution.

### **Conclusion**

The height, bulk and massing of the proposed scheme is considered appropriate and the restrained design is an appropriate response to the location. The proposed residential accommodation would largely comply with the relevant residential development standards. A noise/vibration report and air quality assessment would be required to demonstrate that future occupiers would not suffer as a result of the site's proximity to railway lines.

The proposal is not considered harmful to the amenity of adjoining occupiers in terms of noise or overlooking, but a daylight/sunlight report would be required to demonstrate that the proposal would not have a detrimental impact on daylight or sunlight to neighbouring properties.

A Construction Management Plan would satisfy transport concerns and in terms of sustainability, the proposal would need to comply with Code Level 4 of the Code or Sustainable Homes.

Having regard to the above considerations, were an acceptable scheme submitted the following heads of terms as part of a s106 agreement are likely to be required of the development:

- Car-capped housing;
- Construction Management Plan;
- Highways contribution;
- Post-construction sustainability review/Energy Plan;

It should be noted that for every head of term on the s106 your client would be required to pay the Council's Processing and Monitoring Charge. This would be charged at £365 per head of term.

### **Planning Application Submission**

Please ensure that you submit all the required information in accordance with the validation checklist. I have provided a checklist below for your convenience. More details can be obtained from our website by logging on to [www.camden.gov.uk](http://www.camden.gov.uk).

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the

Development Management section or to the Council's formal decision. If you (the applicant or their representative) have drafted any notes of the pre-application meeting held with the Council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter or the attached document please do not hesitate to contact me on **020 7974 2516**.

Thank you for using Camden's pre-application advice service.

Yours sincerely

Rob Tulloch – Senior Planning Officer  
For Director of Culture and Environment  
**13<sup>th</sup> February 2015**

## Supporting Statements and other information required for a valid application

To submit a valid planning application you would need to provide all the information and plans set out in the attachment to this letter. In addition, you should submit the following statements, showing how far your proposal meets Camden's policies and guidance (see attached guidance notes for further information):

Design and Access statement	Yes
Affordable housing statement (including Viability assessment if less than 50% affordable housing is proposed)	No
Air Quality assessment	Yes
Contamination report	No
Construction Management Plan	Draft CMP is recommended
Daylight/sunlight assessment	Yes
Development phasing plan	No
Ecological survey	Yes
Energy/renewable energy statement	Yes
Environmental Statement/ Impact Assessment	No
Floorspace Schedule (including full break down of residential mix by number of bedrooms and tenure)	No
Light impact statement	No
Listed building/Conservation Area/Historic Gardens appraisal	No
Noise Impact assessment (e.g. Acoustic report for plant)	Yes
Photographs/photomontages	Yes
Planning Statement	Yes
Public Open space assessment	No
Regeneration/Community facilities assessment (re. loss of pub)	No
Retail impact assessment	No
Service Management Plan (including waste storage/removal)	No
Sustainability Statement (including CSH Pre-assessment)	Yes
Transport Statement	No
Tree Survey / Arboricultural statement	Yes