

23 RAVENSHAW STREET, CAMDEN

LPA REF No 2020/2936/P

Responses to Local Objections and Comments

The applicant is aware of the concerns of some local residents which have been submitted to Camden Council Planning Department, and this document seeks to address and allay, as far as possible, those concerns. The objections and issues raised can be grouped into the following categories:

- 1) Density.
- 2) Appearance of the front façade.
- 3) The lightwell treatment.
- 4) The basement and ground stability.
- 5) Traffic generation and parking.
- 6) Overlooking, loss of light and complaints about views from the rear.
- 7) Flooding.
- 8) Disturbance during the construction process.

Density. The proposal has a greater density of use than adjoining properties, but no issues concerning personal health or welfare of the occupants, neighbours or the wider community have been clearly identified. The site's location is within PTAL Level 4. As such the scheme's density is well within Camden's guidelines as well as those of the London Plan. The application is also an efficient use of the site, as required by National Planning Policy.

Appearance of the Front Façade There has been no objection from Camden's Planning Department concerning the appearance of the front of the building above ground level. The design, although somewhat contemporary, is sympathetic to the character and ambiance of the street scene and has raised no alarms or objections from the Planning Authority. Design is a largely subjective issue, and there has to be room for differences and preferences, but unless harm to the character and context of the street scene is shown to be present, comparatively minor differences of opinion regarding architectural taste do not justify a valid objection.

The Basement There is much concern expressed by residents about the development of the basement. The main point that needs to be made is that it would be a wasted opportunity to create much needed additional residential accommodation if the basement flats were to be omitted. Whilst there are no other basement developments in Ravenshaw Street, the surrounding streets have many examples which have been approved by Camden Council; the closest being 1 Dornfell Street just 50m away.

The applicant has used a highly qualified structural engineering consultant, Croft Structural Engineers, to design the basement structure and produce the Basement Impact Assessment (BIA). It is based on an exhaustive Hydrogeology, Hydrology and Land Stability Report prepared by a very experienced Geotechnical Engineer. In turn, the BIA was independently audited, and approved, by Campbell Reith Consulting Engineers on behalf of Camden Council.

In layman's terms, the basement structure itself will take the form of a rigid reinforced concrete box, and far from causing slippage or subsidence to adjoining buildings this structure will, the applicant is advised by the consultants, provide a high degree of stability to the development and to adjoining properties, to a far greater extent than is currently the case. This must be made clear; once completed, the basement structure will consolidate the ground, to the long term benefit of adjoined properties.

The BIA Audit concluded:

5.5. In the revised submissions, the ground movement assessment has been updated and a damage impacts to neighbours are predicted to be within Category 1 (Very Slight), which is accepted.

5.6. The BIA presents an outline structural monitoring methodology which is considered appropriate.

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

One objection raised the issue of vibration from high-speed trains on the line at the rear. The basement consultants were well aware of the presence of the railway lines and the passage of trains on it but raised no concerns in this respect.

The full BIA Audit report is available on the Council's web site.

The Lightwell Treatment This has been the subject of considerable discussion and research and the result is a treatment that a) appears to the passer-by to be the same as other properties in the street, b) allows for a similar degree of planting as adjoining properties, albeit in containers, and c) will afford very little opportunity for a passer-by to see into the basement below, because of screening. The reinforced and decorative non-slip glass used at the entrance will be, in appearance and texture to the casual observer, hardly distinguishable from the Victorian tiling used in other front entrances; it has been carefully designed to perform this role. The only time anyone, other than a very inquisitive passer-by would notice that the basement existed at all would be at night, when there may be some incidental light emanating from the rooms below, but this light would be from an indirect source and heavily shielded from view by the wall and planting. It will also be very largely washed out by light from the street lamp directly in front of the property.

Traffic Generation and Parking There will be a legally binding S106 agreement that no parking permits will be permitted for the occupants, and no provision for on-street parking will be made. The modes of transport that the residents will have, will be walking to the tube station and bus stops, and cycling. Indeed the development, due to the removal of permits and the carpark/crossover, actually creates approximately 4 additional parking spaces.

Over-looking, Loss of Light and Views from the Rear Over-looking has been reduced to an absolute minimum. Where it does exist, to the rear, and with respect to gardens of No. 21A and No. 25A, it is indirect and very limited. Nationally approved daylight and sunlight criteria have been used to ensure that any loss of light to 21A is within the guidelines. The windows and garden of No.25, being south of the development will experience almost zero impact in terms of daylighting and overshadowing unless the earth literally changes its orbit. An overshadowing assessment of the roof dormer of No.25B is shown in the planning statement accompanying the application and on the web site.

There are some comments that the appearance of the proposed development at the rear will be excessively bulky and not in keeping with the surrounding buildings. The CGI illustrations which appear in the Design and Access Statement and on the application web site show how the design of the rear has been made almost indistinguishable in terms of bulk, massing, form and material pallet from that of its neighbours.

The appearance of the whole line of buildings has been described as being a 'jumble' by the planning authority, and it is true that there have been many additions to the rear of many of the buildings over recent years. These have either been approved by Camden Council or were the subject of the exercise of permitted development rights. The Inspector who adjudicated the previous appeal required that any revision of the rear design, which he found to be too 'bulky' should 'respect local context and character', which is an extract from Camden's Policy D1. The new design does exactly that, and melds seamlessly into the surrounding row of rear elevations.

Flooding All issues concerning flooding are dealt with in the application reports:

- Sewer Flood Report Thames Water History Enquiry.pdf
- Sumatra Road Flood Alleviation Project - Thames Water Letter & Map.pdf
- Flood Report GroundSure.pdf
- Flood Report Homecheck Pro.pdf
- Site Survey - Showing Inspection Chambers.pdf
- Site Drain Survey.pdf
- Hydrogeology, Hydrology and Land Stability Report and the Basement Impact Assessments themselves.

There is no issue with flooding in Ravenshaw Street, nor has there ever been. Some historical flooding was experienced in Broomsleigh Street, which has now passed into local folklore. However the causes were well understood and addressed by Thames Water in 2008 via the Sumatra Road Flood Alleviation Project. Full details, (pdf listed above) are on the application web site.

Disturbance During Construction

The applicant understands the concerns and anxieties of neighbours about construction and the associated inconvenience. These concerns are perfectly understandable; however, they are not in themselves a planning refusal reason. The submitted Draft Construction Management Plan, secured in the S.106, directly addresses all the issues raised by respondents in this respect.

Please see:

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8320215/file/document?inline>

CONCLUSION

It is hoped that these responses, clarifications and reassurances, backed up as they are by substantial research, rigorous examination by experts and secured in the s106, will allay some, if not all of the concerns of those residents who have raised objections. During construction there will inevitably be some local disturbance to daily life, but it will be kept to the minimum necessary, as set out in the Construction Management Plan and by adherence to the Considerate Contractors Scheme.

After construction the only significant change to be seen from the street will principally be the infilling of the vacant plot and the number of residents accommodated by the development. Neither of these can stand as planning objections; London needs more dwellings, and if densities cannot be increased within the centre of the city, where the jobs are, then development will have to take place to a greater extent in the outer metropolitan area, constrained by and exerting increased pressure on the Green Belt, and giving rise to more and lengthier journeys to work. This is the fundamental justification for this and similar development proposals.

Roger Tym

Agent for, and planning consultant to the applicant.