

Nora-Andreea Constantinescu
London Borough of Camden
5 Pancras Square
London N1C 4AG

London
Holmes House
4 Pear Place
London SE1 8BT
nexusplanning.co.uk

01 March 2021

Our Ref: 34624

Your Ref: 2020/0927/P

Dear Nora

Re: Planning Application 2020/0927/P at the site located at 31 Willoughby Road, London NW3 1RT

Following our earlier email exchange, I am pleased to attach a Supplementary Note (SN01) which addresses and resolves all the outstanding matters raised in the reports of Campbell Reith, as the Council's appointed independent consultants.

This document provides a targeted response to each point raised, and together with the BIA previously submitted to the Council, demonstrates that the proposed basement would have no harmful impacts, and that it complies with the relevant policies of the Development Plan.

In the Supplementary Note we provide a response to the issues raised in the Campbell Reith audit version D3, which was sent to us on 11 January 2021. Previously Campbell Reith had been instructed by the Council to review a technical assessment prepared by GCG, submitted to them by way of an objection from a group of neighbours at the nearby Willow Cottages. This review was undertaken at an additional cost to the Applicant.

In undertaking the review, Campbell Reith included references to what they considered were the pertinent points of the GCG submission, throughout their BIA audit. Both their audit versions D2 (July 2020) and D3 (January 2021) contain those references and therefore we conclude that Campbell Reith have appropriately considered GCG's submission. The issues raised by Campbell Reith, and the pertinent issues raised by the Willow Cottages group through GCG have therefore been comprehensively addressed in Michael Eldred's updated BIA and his Supplementary Note (SN01) here attached.

In your email of the 12 January 2021, you noted that the comments raised by GCG were similar to those raised by Campbell Reith, and our Supplementary Note (SN01) is therefore directed to address comprehensively all the issues raised by Campbell Reith, as your appointed Consultants. You also

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indicated that it was the Applicant's responsibility to ensure that the issues raised by the neighbours in their email dated 25 May 2020 were fully addressed. Whilst we consider that the pertinent issues have already been addressed both in our response to Audit D2 (July 2020) and in the accompanying Supplementary Note SN01, Eldred Geotechnics have also prepared a Technical Note TN01, which seeks to comprehensively address each of the points raised in the email.

Our client has approached resolving these outstanding concerns reasonably and pragmatically. It does appear to us as though the level of information requested has been over that at other sites in the Borough, for comparable schemes. We would, for example, not have anticipated being required to specifically address representations made by a consultant instructed by a group of neighbours of the site, when the Council's own appointed and independent consultants were assessing the same documents. We would also highlight that the owners of the directly adjoining properties on either side of site, have not raised any objection to the scheme.

Our client considers it regrettable that a letter submitted by objectors, the purpose of which appears to have been to cast as much doubt as possible over the integrity of the scheme, has been given so much attention.

The above notwithstanding, in the spirit of full collaboration with the Council we have attached without prejudice Technical Note TN01, the purpose of which is to comprehensively address any suggestion from the neighbouring group that the BIA and Supplementary Note SN01 is deficient in any way. In the interest of expediency, we have addressed each point raised by the neighbours in their email and have pointed to the paragraph of the BIA or SN01 that has addressed the point where appropriate. We also note that you had previously raised a query over the positioning of the kitchen at basement level due to potential flood risk. We have demonstrated through Technical Note TN01 and the revised BIA that the proposed basement level would not be at risk of flooding.

We trust this additional information provides the Council with the necessary comfort to approve this application.

If you have any questions, please don't hesitate to be in touch. Otherwise, we look forward to receiving a positive decision as soon as possible.

Yours faithfully

Zena Foale-Banks

Principal Planner