

Date: **22/12/2021**
Your ref: **APP/X5210/W/21/3281530**
Our ref: 2020/2936/P
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Dear Roger Tym

Planning Appeal by Cristopher Taylor
Site: 23a Ravenshaw Street London NW61NP

Appeal against the refusal of planning permission for ‘Erection of a three storey plus basement building comprising 7 Class C3 flats (4x3-bed units and 3x2-bed units) with balconies at the rear following demolition of the existing house.

The Council’s case for this appeal is largely set out in the officer’s delegated report. This details the site and surroundings, the site history and a consideration of the main issues: design and creation of self-contained dwellings within a flood risk zone. A copy of the report was sent with the questionnaire.

In addition to the information sent with the questionnaire I would be pleased if the Inspector could take into account the following information and comments, before deciding the appeal.

Summary of issues

The proposal has been refused on following grounds in summary.

1. Scale bulk and massing
2. Flood risk to basement
3. Legal agreement regarding construction management plan, car free development, affordable housing contribution, highway contribution and approval in principle regarding public highway stability.

The appeal relates to a two storey house located on the southwestern side of Ravenshaw Street which is in use as 2 self-contained flats. Adjacent to the site is a large car park which was previously in use as a builder’s yard and to the rear of the site is a railway line. Between the railway line and the appeal site there is a green private open space designated a borough site of Nature Conservation importance.

It is acknowledged that applicant considers that the proposed rear elevation attempts to respond to the existing surrounding Victorian buildings that has expanded over time with extensions, dormers and infills. However, the council considers that the proposal does not reflect the exiting pattern of development.

On the northern side boundary the first floor elevation of the development is in line with the neighbouring property, 21 Ravenshaw Street. Likewise, on the southern side boundary, the ground and first floor match the projection of the 2 storey outrigger at 25 Ravenshaw Street. However, rather the development stepping out and then stepping back to the established rear building line as found on properties to the north and south, the majority of the ground and first floor projects into the garden. Even though this projection is in line with existing closet wings of neighbouring properties. The width of the projection measures approximately 15m whereas the width of paired outriggers on this side of Ravenshaw Street is approximately 6m. There are 3 outriggers close together at 17-21 Ravenshaw Street with only a 1.6m gap between the paired outriggers of 19-21 Ravenshaw Street and the outrigger of 17 Ravenshaw Street. However, even in this situation, the outriggers have a cumulative width of approx. 11m, which is still substantially less than the 15m width of the proposed rear projection of the application scheme. This results, in a bulky appearance, especially at first floor level.

The bulkiness is further prominent at roof level with the proposed full width roof dormers. Even though the dormers were revised during the course of the application and reduced in size, the second floor would still appear bulky and excessive harming the character and appearance of the property and this part of the Ravenshaw Street. While the council acknowledges that surrounding properties at roof level have examples of rear dormers, it is considered many of these dormers were built under permitted development and would not have been assessed against the council's Development Plan. In addition, other dormers within the immediate area, have no planning history and would have been unauthorised when built.

Although the proposed works to the rear of the site, would not be highly visible from the streetscene, it is considered that the proposed works would still be viewed by private vantage points from neighbouring properties. This was acknowledged by an inspector in a previous appeal (**APP/X5210/W/19/3225592**) at the application site. The inspector dismissed the appeal and the current application subject to this appeal seek to address the previous issues raised. Even though the scheme has been reduced since the previous appeal (see below) as outlined in the officers report, the council still considers that the proposed rear elevation in terms of scale and massing would appear disproportionately large and out of keeping with the rear of the adjoining terrace. As stated, even though the rear development would not be visible from public realm, it would be still viewed from neighbouring properties and in particular from flats in Ellerton Tower, Mill Lane and in the Brassey Road Estate to the south of the railway. It would also be visible from the railway line to the rear and from rear garden along Ravenshaw Street.

While the applicant would be optimising the site capacity by providing 5 flats, the council considers that a design led- approach has not been followed as required under Policy D3 of the London Plan. It is considered that proposed rear development would not respect the existing architectural rhythm of Ravenshaw Street. In addition, the council seeks to secure high quality development which reflect and integrate with the its surroundings. The proposed scale and mass of the rear elevation and its lack of relationship to the surrounding context results in an overdevelopment of the site which does not meet the Council's expectation of high quality design.

The proposed development includes locating two self-contained flats at basement level. However, the site falls within the Sumatra Road Local Flood Risk Zone (see below) and within a Critical Drainage Area. Therefore, the proposal would introduce highly vulnerable uses into an area prone to flooding.

The development proposes two self-contained flats which would be unacceptable at basement level. The Lead Local Flood Authority (LLFA) has been consulted and they have confirmed that the location of self-contained flats at basement level would be contrary to policies A5 and CC3 of the Camden Local Plan.



This site falls within one of our Local Flood Risk Zones as defined within figure 6 of the SFRA (above).

As outlined in detail in the delegated report although the BIA audit states that the proposed development is at very low risk of flooding, BIAS are not primarily focused on the acceptability of introducing highly vulnerable uses into an area prone to flooding. This matter is for the Lead Local Flood Authority (LLFA). As a result, the LLFA comments stand in their own right in regard to local planning policy and they should not be considered to be in contradiction with the BIA Audit, which has a different focus and a different set of parameters to assess.

The applicant draws attention to other applications in Local Flood Risk Zones where the Council has approved habitable rooms at basement level. However, where the Council has approved self-contained flats at basement level (2016/3545/P and 2016/6714/P), these applications were registered prior to the adoption of the Local Plan

2017 and neither of these applications appear to have consulted the Lead Local Flood Authority as required. These decisions do not provide a precedent for the current application and self-contained flats at basement level cannot be supported in a flood risk zone.

There were a further 6 reasons for refusal related to the lack of legal agreement securing various necessary requirements: Construction Management Plan, Construction impact bond, car-free housing, affordable housing contribution, highway contribution, AIP report. The appellant has submitted a unilateral agreement in regards to these matters and this is currently being progressed by the council's legal team. The justification for these planning obligations will be provided below.

Status of Policies and Guidance

The London Borough of Camden Local Plan was formally adopted on the 3rd July 2017. The policies of relevance to the appeal scheme as expressed in the reasons for refusal are: D1, A1, A3, T1, C1, C5, C6, CC1, CC2, CC3, CC4, CC5, H2, H4, H6, H7 and G1 (The full text of the relevant policies was sent with the questionnaire documents).

Fortune Green and West Hampstead Neighbourhood Plan

Policy 1 Housing

Policy 2 Design & Character

Policy 7 Sustainable Transport

Policy 8 Cycling

The Council also refers to supporting guidance documents: The Camden Planning Guidance has been subject to public consultation and was approved by the Council on the following dates:

CPG Design (January 2021)

CPG Housing (January 2021)

CPG Developer contributions (March 2019)

CPG Energy efficiency and adaptation (January 2021)

CPG Transport (January 2021)

CPG Basements (January 2021)

CPG Water and flooding (March 2019)

CPG Housing (January 2021)

CPG Energy efficiency and adaptation (January 2021)

With reference to the National Planning Policy Framework 2021, policies and guidance contained within Camden's Local Plan should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework.

Comment on the Appellant's Ground of Appeal

The appellant grounds of appeal can be summarised as follows:

1. The council design issues solely relate to the proposed rear elevation and raises no issues about the proposed front elevation.
2. Due to the unusual shape of the infill site, an inventive and imaginative '*design led*' approach has been undertaken.
3. The design of the development eschews architectural theatricality and is an imaginative solution to an infill site. The proposal creates five additional dwellings and do not result in an imposing development affecting neighbouring properties or the wider public realm. The proposed rear elevation follows the general pattern of development along Ravenshaw Street. Many properties along Ravenshaw Street have been developed to the rear, some of which have been legal and some which benefit from planning permission. While some of the development may not be considered '*architectural gems*' they are apart of the built form and from which the development must respond.
4. Numerus other dormers, roof additions and extensions have been added to neighbouring properties along Ravenshaw Street creating an organic and complex pattern of development which is lacking any 'designed' cohesion. Many of the additions built under permitted development are equally lawful and form an intrinsic part of the built environment. As a result the rear façade is designed to reflect this.
5. Image A, B and C are submitted to challenge the case officer's statement that the design massing and scale of the proposed development would be excessive and disproportionate when compared with the rear elevations of neighbouring properties.
6. The images submitted, show that residents of Ellerton Tower, the Brassey Road Estate, or a passenger on a train would ever be able to see the proposed development from the rear.
7. Properties on the other side of the tracks, would have reduced views due to windows being semi-obsured and the presence of trees. In addition the '*greater part*' of the proposed development would not be seen from these viewpoints. The properties on Brassey Road do not front onto the railway line, the rooms which face onto the railway line are kitchens, bathrooms and stairway windows. Occupants from these properties would view the top of the buildings along the rear of Ravenshaw Street.
8. As a result the occupants of both Brassey Road and Ellerton Tower view of the development would be lost in the surrounding rear elevations even if the occupants could see through the trees in winter. It is considered that there daily life would be materially harmed in some way is not credible and should not be reason for refusal. The officers '*are expressing their own perceptions of and reactions to what they presume the views to be.*' In addition '*No assessment of*

views of the rear of the terrace and the proposal without recognising the presence and effect of the trees is either credible or meaningful'.

9. The appellant opinion is supported by a decision made by the inspector in 2017 regarding No.71 Ravenshaw Street (**Appendix 7**).
10. The council's officer's criticism are their own perceptions on what the appearance of the proposed development would be but fail to identify the harm. The officers focuses on the size and how the development is out of keeping with the surrounding terrace. In addition the appellant states '*does the size, bulk and disproportionality which are alleged cause to the lives of the owners and their enjoyment of their properties?*'
11. The theme running through all policies that there is a need to create more homes for the growing population. There is arguing that there is a requirement for a '*design-led approach*' or '*good design*'. However, a proposed development is far more than just visual style and none of the policies state that the proposed development should '*adopt the latest architectural fashions in order to gain approval*'
12. The appellant states that the second reason for refusal which is '*The proposed development, by reason of the provision of self-contained dwellings at basement level within the Sumatra Road Local Flood Risk Zone, would introduce highly vulnerable uses into an area prone to flooding contrary to policies A5 (Basements) and CC3 (Water and Flooding) of the London Borough of Camden Local Plan 2017*', doesn't take into account previous decisions the council made in regards to creation of flats within basement developments. In addition, the proposed basement flats would be considered a duplex arrangement instead of self-contained flats similar to a previous application at 190 Goldhurst Terrace under ref 2016/2689/P.

The Council's comments on the grounds of appeal

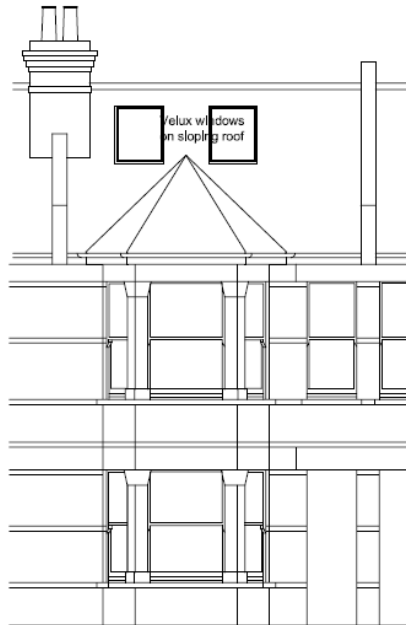
The Council does not accept the appellant's assertions for the following reasons. The Council will address each of the appellant's grounds for appeal in the order they are set out above.

1. As stated in the report, the council considers the design of the front elevation of the proposal to be acceptable as this elevation has been amended since the previous appeal **APP/X5210/W/19/3225592** taken into account the inspector considerations regarding the basement and the lightwells.
2. The Council does not agree that the proposed development is '*design –led*'. The council considers that the proposed rear elevation does not mirror or respect the prevailing pattern of development along Ravenshaw Street and as a result does not integrate into its surrounding.
3. The council agrees that the proposed development would not result in amenity issues for neighbouring properties. However, the council disagrees that the

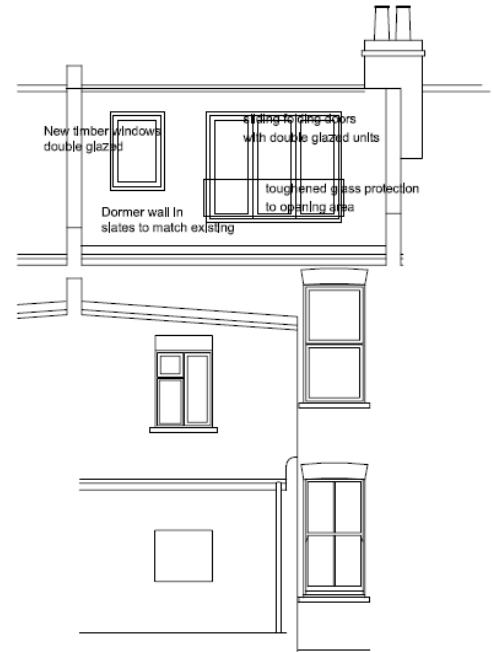
proposed rear elevation follows the general pattern of development. Although it is acknowledged that many neighbouring properties have rear additions in form of extensions and dormers, it is considered that the rear elevation would impact negatively on the host building and the adjoining terrace as it fails to take account the scale of terrace and would result in a bulky form of development.

4. The council agrees and acknowledged that many neighbouring properties have constructed dormers as stated in paragraph 2.26 of the delegated report. As stated in the report, it is considered that many of these dormers would be been built unlawfully or were built under permitted development and were not assessed against the Councils Development Plan. Although roof dormers are a part of the pattern of development, the council considers the proposed full width rear dormers due to their location, scale and bulkiness are uncharacteristic and would be detrimental additions when viewed in context with neighbouring rear elevations.
5. The council disagrees, from examining images A, B and C, it is considered that the proposed rear elevation would due, to its scale and mass would be significantly at odds with the surrounding pattern of development. As stated, in the report while the rear elevation would not be visible from the public realm, it would still be viewed from private vantage points.
6. The council disagrees that residents along Ellerton Tower, Brassey Road and passengers on a train would not be able to see the proposed development. The presence of the trees may reduce visibility of the rear elevation but not completely. In addition, occupants along Ravenshaw Street would be able to view the proposed rear elevation. As outlined by the inspector in **APP/X5210/W/16/3157363** *'Whilst I accept these would be at some distance and oblique in the case of the views from Ellerton Tower, from these positions the development would be seen as obtrusive and out of character in the context of the wider terrace.'*
7. The council may agree that views from Brassey Road may be reduced due to the presence of trees but is considered that the occupants of Brassey Road would still be able to view the proposed rear elevation. Although some of the windows may be obscured glazed, occupants would still be able to view the proposed development from their kitchens windows.
8. The appellant states that one of the reasons for refusal was that the occupants *'daily life would be materially harmed is not credible and should not been reason for refusal'*, however this was not a reason for refusal as shown on the decision notice dated 03/03/2021. Whilst, the appellant argues that the officers were expressing their own opinions or perceptions of the proposed views, the council maintains the view that the proposed rear elevations would be viewed from private vantage points from neighbouring properties along Brassey Road, Ellerton Tower and Ravenshaw Street.
9. The appellant argues that appeal decision under **APP/X5210/W/16/3157363** at 71 Ravenshaw Road supports the argument that many neighbouring properties have considerably large dormers and that public views of the terrace are limited.

As stated under paragraph 2.26 of the delegated the council agrees that many neighbouring properties have rear dormers and that views of the rear are limited from the public realm. However, the council considers that the proposed rear dormers subject to this appeal are considerably larger and more dominant compared to other rear dormers along Ravenshaw Street. When compared to no.71 Ravenshaw Road (see below), the proposed dormers are full width and are bulkier additions to the rear roofslope.

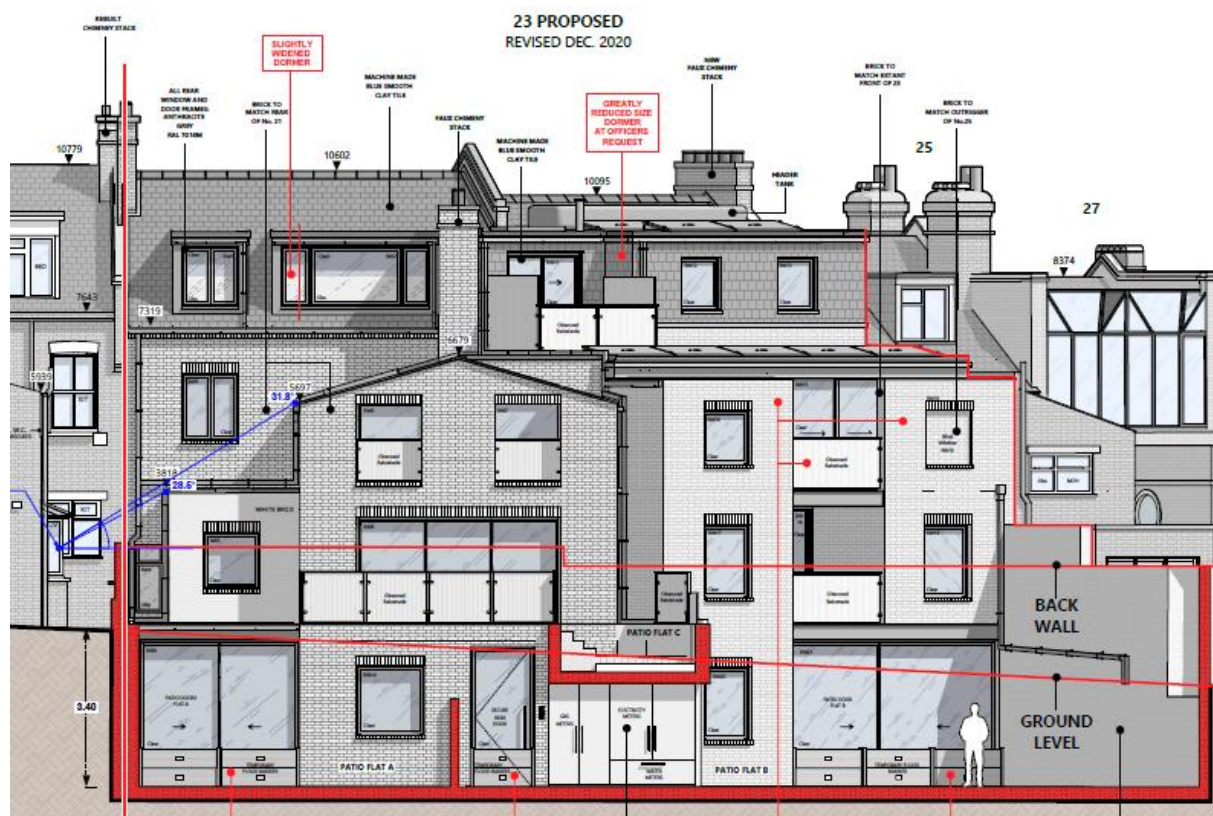


FRONT ELEVATION



REAR ELEVATION

*Proposed dormer granted under **APP/X5210/W/16/3157363***



Proposed rear elevation of 23 Ravenshaw Road

10. The council disagrees that the officers failed to identify the harm that the proposed development would cause. As outlined, in the delegated report and the decision notice, the council consider that overall scale and mass proposed at the rear elevation would be appear disproportionately large and out of keeping with rear of the adjoining terrace. The council do not state in the assessment that the proposed development would result in neighbouring properties not enjoying their properties, as stated in the report, the council considers the design of the proposed development to be harmful and would result in over-development of the site. However, it is considered as some of the neighbouring properties would be able to view the proposed rear elevation from private vantage points which would cause further harm.
11. Whilst the appellant argues that a development is more than just a '*visual style*' and that a proposed development should not have to adopt the latest architectural fashions to obtain planning permission. The council argues that as stated in the London Plan and Policy D3 development must make the best use of land by following a design led approach that will optimise the sites capacity. A design led approach should be based on an assessment of the sites attributes including its surrounding context to ensure that the appropriate form of development is created.
12. As stated in paragraph 2.42 of the delegated report even though there is several examples of applications where the council has approved self-contained flats at basement level. It is noted that many of these listed by the appellant in

11. Whilst the appellant argues that a development is more than just a '*visual style*' and that a proposed development should not have to adopt the latest architectural fashions to obtain planning permission. The council argues that as stated in the London Plan and Policy D3 development must make the best use of land by following a design led approach that will optimise the sites capacity. A design led approach should be based on an assessment of the sites attributes including its surrounding context to ensure that the appropriate form of development is created.

12. As stated in paragraph 2.42 of the delegated report even though there is several examples of applications where the council has approved self-contained flats at basement level. It is noted that many of these listed by the appellant in

appendix C were registered prior to the adoption of the Local Plan 2017. In addition as shown in the appellant's evidence under appendix C, the Lead Local Flood Authority was not consulted for majority of these applications. As a result these decisions do not provide a precedent for the current appeal and self-contained flats at basement level cannot be supported in a flood risk zone. The council disagrees with the appellant that the arrangement is similar to a duplex, the council consider the proposed flats at basement level would be self – contained. In addition as stated above, this decision ref 2016/2689/P at 190 Goldhurst Terrace was prior to adoption of the Local Plan 2017 and the Lead Local Authority were not consulted for this application.

Planning Obligations

Construction management plan

The Council's primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. In addition, the proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

Impact on the highway network and immediate environment is likely during construction. Given the size of the proposed development the proposal is likely to represent a detrimental impact on the highway network during its construction period. This likely level of works is considered sufficient to require a Construction Management Plan (CMP) in order to mitigate any adverse impacts.

A planning obligation is considered to be the most appropriate mechanism for securing compliance with a CMP in this case simply because a considerable extent of the activity during construction could cause conflict with other road users or be detrimental to the amenity of the area and will necessarily take place outside the curtilage of the planning unit of the appeal site. Potential impacts for the proposed demolition/construction works which should be controlled by a CMP include traffic generation from removal and delivery of materials to the site. This could result in traffic disruption and dangerous situations for pedestrians and road users.

Under s72 of the Town and Country Planning Act 1990 planning conditions are used to control matters on land within the developer's control. However, a CMP is designed to be an enforceable and precise document setting out how measures will be undertaken not just on site but also around the site in order to minimise as far as reasonable the detrimental effects of construction on local residential amenity and / or highway safety on the nearby roads hence, using a condition to secure the type of off-site requirements usually included in a CMP would in this case be unenforceable.

Conditions can only lawfully be used to control matters on land within the developer's control. Many of the CMP provisions will relate to off-site requirements, particularly public highway (which is not land within the developers' control). As such, a Section 106 Agreement (rather than a condition) is the most appropriate mechanism.

Compliance with CIL reg 122

The CMP is: (i) necessary to mitigate against the adverse impacts of the construction stage; (ii) directly relates to the construction stage of the proposed development; and (iii) is fairly and reasonably related in scale and kind to development in that it address relevant aspects of construction phase of the development as identified under the Council's development plan for developments of the nature proposed. Further, the CMP will ensure that the effects of construction are managed in an appropriate manner.

Car Free Housing

Policy T2 requires all new developments in the borough to be car-free. Car-free development means that no car parking spaces are provided within the site and current and future occupiers are not issued with on-street parking permits.

A planning obligation is considered the most appropriate mechanism for securing the development as car capped as it relates to controls that are outside of the development site and the level of control is considered to go beyond the remit of a planning condition. Furthermore, the Section 106 legal agreement is the mechanism used by the Council to signal that a property is to be designated as "car free". The Council's control over parking does not allow it to unilaterally withhold on-street parking permits from residents simply because they occupy a particular property. The Council's control is derived from Traffic Management Orders ("TMO"), which have been made pursuant to the Road Traffic Regulation Act 1984. There is a formal legal process of advertisement and consultation involved in amending a TMO. The council could not practically pursue an amendment to the TMO in connection with every application where the additional dwelling (or dwellings) ought properly to be designated as car free. Even if it could, such a mechanism would lead to a series of disputes between the council and incoming residents who had agreed to occupy the property with no knowledge of its car-free status. Instead, the TMO is worded so that the power to refuse to issue parking permits is linked to whether a property has entered into a "Car Free" Section 106 Obligation. The TMO sets out that it is the Council's policy not to give parking permits to people who live in premises designated as "Car Free", and the Section 106 legal agreement is the mechanism used by the Council to signal that a property is to be designated as "Car Free".

Further, use of a Section 106 Agreement, which is registered as a land charge, is a much clearer mechanism than the use of a condition to signal to potential future purchasers of the property that it is designated as car free and that they will not be able to obtain a parking permit. This part of the legal agreement stays on the local search in perpetuity so that any future purchaser of the property is informed that residents are not eligible for parking permits.

Compliance with CIL reg 122

The proposed restriction on the development being secured as “car-free” meets the requirements of the CIL Regulations in being: (i) necessary to make the development acceptable in planning terms as identified by the relevant development plan policies; (ii) is directly related to the occupation of the residential units being part of the development; and (iii) is fairly and reasonably related in scale and kind to the residential units. This supports key principle 9 of the National Planning Policy Framework: Promoting sustainable transport.

Affordable Housing contribution

Policy H4 requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.

Given the scale of affordable housing need in the borough, the Council’s aspiration is that as many residential developments as possible should provide affordable housing. The Camden Local Plan Viability Study shows that there is no direct correlation between scheme size and viability, and there is no viability basis for an affordable housing threshold or a lower target for smaller schemes. Through the Local Plan process, the Council has made provision for the Local Plan to seek affordable housing from smaller schemes as an exception to the national threshold.

On this basis of 529.9sqm GIA of additional housing floorspace proposed, this would result in a requirement for 10% affordable housing. This would equate to 52.99sqm GIA of affordable floorspace. The payment in lieu would be £5000 per sqm GIA. Therefore, the affordable housing payment in lieu would be £264,950 (52.99sqm x £5,000).

A planning obligation is considered the most appropriate mechanism for securing the affordable housing contribution as it relates to a payment in lieu. No payment of money can be secured by condition.

Compliance with CIL reg 122

The requirement for an affordable housing contribution meets the requirements of the CIL Regulations in being: (i) necessary to make the development acceptable in planning terms as identified by the relevant development plan policies; (ii) is directly related to the creation of residential floorspace which is part of the development; and (iii) is fairly and reasonably related in scale and kind to the residential units.

Delegated report

The full assessment is set out in the delegated report.

Other Matters

On the basis of information available and having regard to the entirety of the Council's submissions, including the content of this letter, the Inspector is respectfully requested to dismiss the appeal. In the event of the appeal being allowed the conditions provided below should be attached and a legal agreement to secure a construction management plan, car free housing, AIP report and affordable housing contribution.

The Appellant has indicated they are willing to enter into s106 legal agreement in regards to the planning obligations set out above. The council are currently still seeking to agree this with the appellant (without prejudice to the outcome of the appeal) and will update the Inspector at the final comments stage on 5th January 2022.

If any further clarification of the appeal submissions is required please do not hesitate to contact Enya Fogarty on the above direct dial number or email address.

Yours sincerely

Enya Fogarty
Planning officer
Regeneration and Planning

Proposed Conditions

1. The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

Site location plan; Extant drawings 01-07; Elevations (VERSION 5 - 13 December 2020) 01-04; Plans (VERSION 5 - 13 Dec 2020) 01-07; Sections (VERSION 5 - 13 Dec 2020) 01-08; Supporting documents: BIA-23RAV- BIA Structural Wall Comparison; SD-61 (Sections and Details 2); Basement Method Statement prepared by Croft Structural Engineers dated 25/05/17; Basement Impact Assessment prepared by Maund Geo-Consulting dated 1 June 2017; Scheme Structural Calculations for Planning prepared by Croft Structural Engineers dated 23/05/17; SL-50 (Structural Scheme Basement); Water Efficiency Calculation dated 14/02/2017; BRE Daylight and Sunlight letter prepared by Right of Light Consulting dated 29 June 2020; Daylight and Sunlight Study (Within Development) prepared by Right of Light Consulting dated 29

June 2020; Design and Access Statement dated 29/06/2020; Regulations Compliance Report (SAP calculations); Energy & Sustainability Statement prepared by C80 Solutions dated March 2020; 3039/1 (land survey); Noise And Vibration Assessment prepared by KP Acoustics dated 19 January 2015; Planning statement prepared by Quilichan Consultancy dated 02/07/2020; Preliminary Ecological Appraisal prepared by Urban Edge Environmental Consulting dated February 2015; Sumatra Road Flood Alleviation Project email prepared by Thames Water dated 19 May 2017; Sewer Flooding History Enquiry (Thames Water) dated 5 May 2017; Sustainability: Demolition vs. Retrofit; Building Retention vs Replacement Statement prepared by NDM Heath Ltd dated April 2017; Tree survey prepared by Tree Reports dated 4 February 2014; Groundsure - Electricity; Groundsure - Gas; Groundsure - Telecoms / Cable; Groundsure - Water and sewers; Air Quality Assessment prepared by Air Quality Assessments dated 25 February 2015; Daylight, Sunlight & Overshadowing Impact Assessment prepared by Space Strategy dated 29.03.16; Flood Risk Assessment and Surface Water Drainage Strategy for Planning prepared by UNDA dated December 2020; Proposed GIA Verification (11 Feb 2021) 01-04.

Reason: For the avoidance of doubt and in the interest of proper planning.

3. All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the London Borough of Camden Local Plan 2017

4. Prior to commencement of any impact piling, a piling method statement shall be submitted to and approved in writing by the local planning authority. The Method Statement shall be prepared in consultation with Thames Water or the relevant statutory undertaker, and shall detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of Policy CC3 of the London Borough of Camden Local Plan 2017.

5. Before the development commences, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1, A4 and TC4 of the London Borough of Camden Local Plan 2017.