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**MACKELLAR HOUSE  
BURGESS HILL  
LONDON  
NW2 2DB**

**PRIOR APPROVAL NOTIFICATION FOR TWO ADDITIONAL  
STOREYS**

**PLANNING STATEMENT**

April 2025

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Version: 1

Version Control	Name	Date
Report author:	Giles Moir BA (Hons) MTP MRTPI	April 2025

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# 1. Introduction

1.1 This Planning Statement has been prepared in support of an application for ‘Prior Approval Notification for two additional storeys’ application made under Schedule 2, Part 20, New Dwellinghouses Class A ‘New dwellinghouses on detached blocks of flats’ of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO 2015) at MacKellar House, Burgess Hill, London, NW2 2DB (hereafter referred to as the ‘site’).

1.2 In accordance with paragraph 39 of the National Planning Policy Framework, the applicant would like to work proactively with the Council to reach a positive conclusion.

1.3 The application comprises:

- Completed ownership certificates;
- Application form and CIL form;
- Daylight and Sunlight Assessment prepared by Herrington Ltd;
- Proposed Visualisations;
- Plans and drawings prepared by Archiside Ltd, including:
 

○ Existing Site Plan	Dwg No: EX.01	1:200 scale @ A1
○ Existing Ground Floor Plan	Dwg No: EX.02	1:100 scale @ A3
○ Existing First and Second Floor Plan	Dwg No: EX.03	1:100 scale @ A3
○ Existing Roof Plan	Dwg No: EX.04	1:100 scale @ A3
○ Existing Front Elevation	Dwg No: EX.05	1:100 scale @ A3
○ Existing Rear Elevation	Dwg No: EX.06	1:100 scale @ A3
○ Existing Northeast Elevation	Dwg No: EX.07	1:100 scale @ A3
○ Existing Southwest Elevation	Dwg No: EX.08	1:100 scale @ A3
○ Location Plan	Dwg No: L.01	1:1250 scale @ A4
○ Proposed Site Plan	Dwg No: P.01	1:200 scale @ A1
○ Proposed Third Floor Plan	Dwg No: P.02	1:100 scale @ A3
○ Proposed Top Floor Plan	Dwg No: P.03	1:100 scale @ A3
○ Proposed Roof Plan	Dwg No: P.04	1:100 scale @ A3
○ Proposed Front Elevation	Dwg No: P.05	1:100 scale @ A3
○ Proposed Rear Elevation	Dwg No: P.06	1:100 scale @ A3
○ Proposed Northeast Elevation	Dwg No: P.07	1:100 scale @ A3
○ Proposed Southeast Elevation	Dwg No: P.08	1:100 scale @ A3

## 2. The Application Site and Surroundings

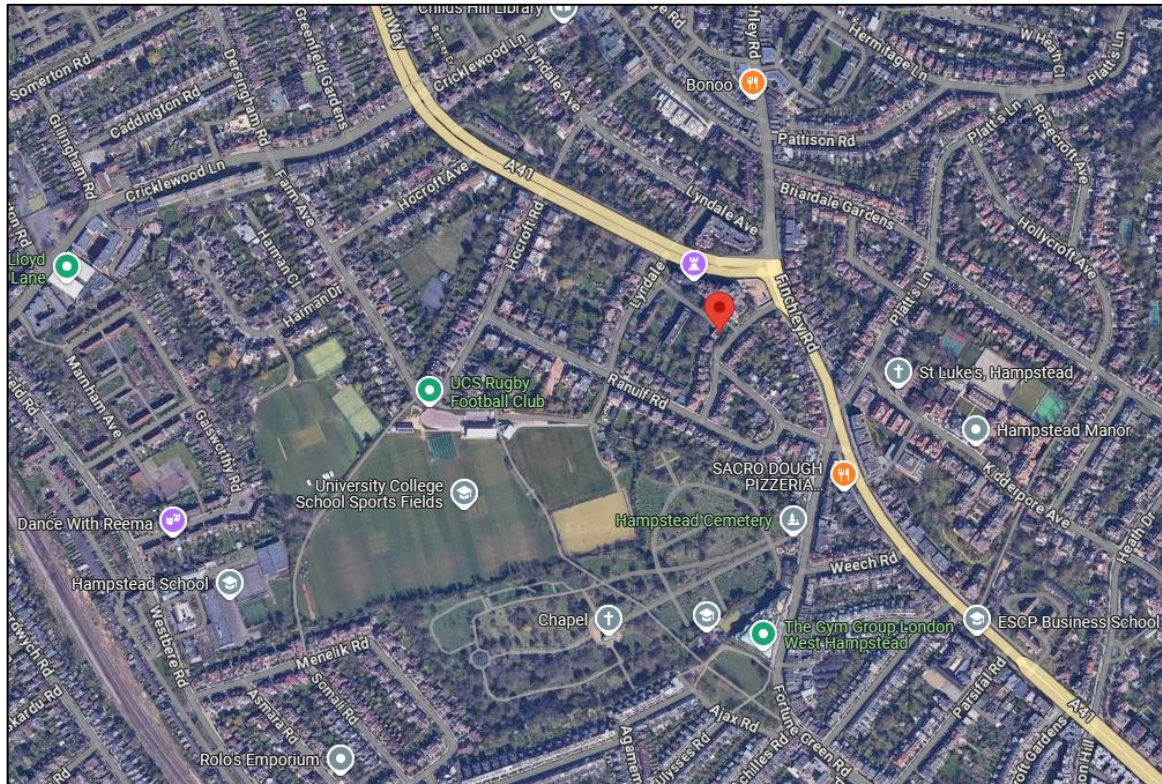
- 2.1 The application site is located on the western side of Finchley Road (A41), situated off Burgess Hill, within Camden Council administrative boundaries.
- 2.2 Mackellar House consists of an existing purpose built, detached, three-story building finished in a red brickwork and set beneath a flat roof.
- 2.3 Vehicular access is currently achieved from the rear of the building off Lyndale road through the Durrisdeer House and Ballantrae House estate.
- 2.4 The building is well screened, on a number of sides, by a number of mature trees and other vegetation. Mackellar House has an active frontage onto Burgess Hill.
- 2.5 The application site is situated in a sustainable location in Finchley and has access to a good range of quality facilities. These include schools, several restaurants, leisure facilities, a range of sports facilities, schools and a variety of retail facilities.



**Figure 1: Image of the Mackellar House from the rear of the building**

- 2.6 The application site is not listed or within the setting of listed buildings. The site is not situated in a Conservation area. Moreover, there are no non-statutory, or statutory, designated heritage assets within or immediately adjacent to the site where their setting has the potential to be affected.

- 2.7 With regard to flood risk, the site is located entirely in Flood Zone 1, therefore is at low risk of flooding from fluvial sources. The site has been identified to be at very low risk of flooding from surface water. The site is not subject to any Tree Preservation Order Trees.



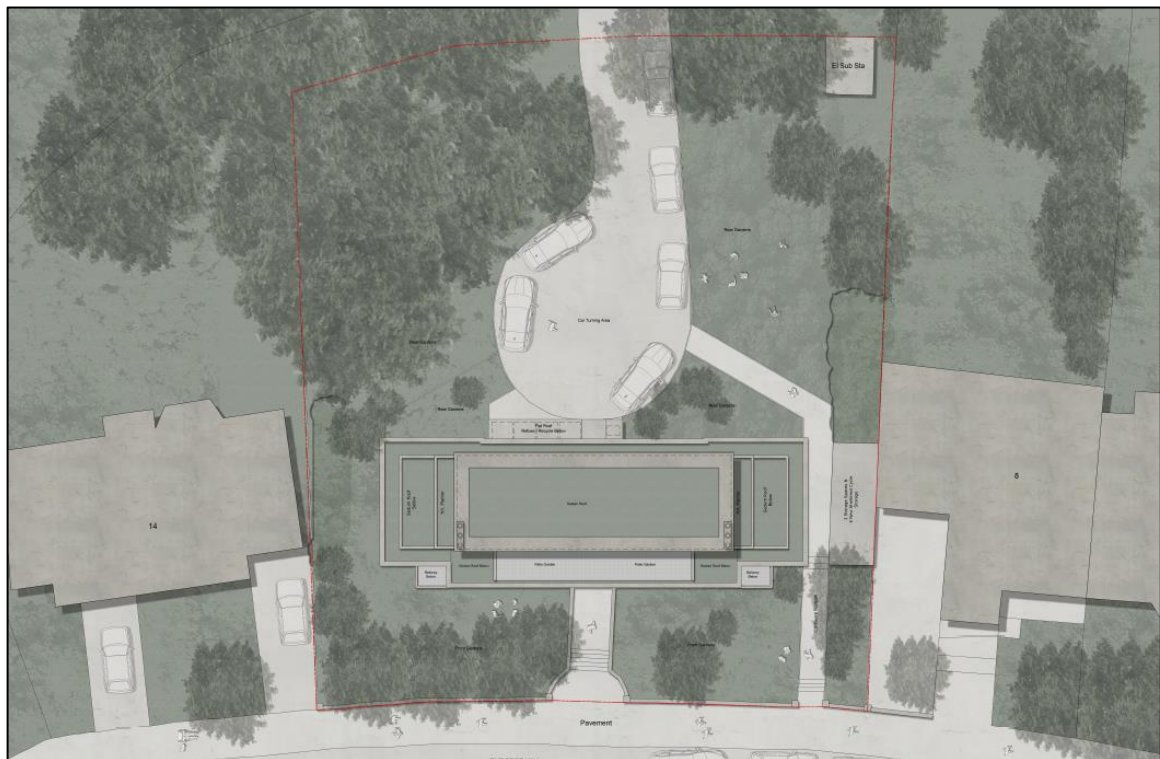
**Figure 2: Ariel Image of the application in the context of the surrounding area**

### **3. Relevant Planning History**

- 3.1 The established lawful use of the property is Class C3 – dwelling houses.
- 3.2 A review of the relevant planning history pertaining to the site confirms is not subject to an Article 4 Direction or planning conditions that would serve to restrict Permitted Development Rights.
- 3.3 Chapman Lily Planning have undertaken a review of the Camden Council planning application facility which revealed the following planning application accords pertaining to the site itself:
- Application 8693406. Fell 2 Poplar trees at rear. Agree to removal & replacement of Trees. 31-10-1986
  - Application 8693005. Prune trees at rear. Part Approve/Part Refuse. 09-01-1986

## 4. The Proposed Development





- 4.1 The proposed development is described as *'Prior Approval Notification for two additional storeys'* under Class A of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.
- 4.2 The proposal will provide a net increase of 3 dwellings spread across both of the proposed floors – the third and fourth floors.
- 4.3 An extract of the Proposed Site Plan is provided below.










**Figure 3: Extract of Proposed Site Plan**




## 5. Planning Assessment


- 5.1 Class A of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) allows for '*new dwellinghouses on detached blocks of flats*', subject to certain conditions being met.
- 5.2 Class A sets out that development is permitted where it would consist of works for the construction of up to two additional storeys of new dwellinghouses immediately above the existing topmost residential storey on a building which is a purpose-built block of flats, together with any or all:
- Engineering operations reasonably necessary to construct the additional storeys and new dwellinghouses;
  - Works for the replacement of existing plant or installation of additional plant on the roof of the extended building reasonably necessary to service the new dwellinghouses;
  - Works for the construction of appropriate and safe access to and egress from the new and existing dwellinghouses, including means of escape from fire, via additional external doors or external staircases;
  - Works for the construction of storage, waste or other ancillary facilities reasonably necessary to support the new dwellinghouses.
- 5.3 Paragraph A.1 sets out when development would not be permitted, and thus provisions that must be satisfied. With respect to each we can confirm that:

Development is not permitted by class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
a) The permission to use any building as a dwellinghouse has been granted only by virtue of Class M, MA, N, O, P, PA or Q of Part 3 of this Schedule	The use of the building has not been borne from a change of use from Part 3 of the Schedule and proposal therefore satisfies this provision.	
b) Above ground level, the building is less than 3 storeys in height	The building is three storeys in height and therefore the proposal satisfies this provision.	
c) The building was constructed before 1 <sup>st</sup> July 1948, or after 5 <sup>th</sup> March 2018	The block was not constructed before 1st July 1948 or after 5th March 2018 and therefore the proposal satisfies this provision.	
d) The additional storeys are constructed other than on the principal part of the building	The additional storeys are spread evenly across all elevations of the existing block, on the principal part of the building, and therefore the proposal satisfies this provision.	


e) The floor to ceiling height of any additional storey, measured internally, would exceed the lower of – i) 3 metres; or ii) The floor to ceiling height, measured internally, of any storey of the principal part of the existing building	The floor to ceiling height of each additional storey is below the floor to ceiling height (measured internally) of any storey of the principal part of the existing building and therefore the proposal satisfies this provision.	
f) The new dwellinghouses are not flats	The new dwellinghouses are flats (Use Class C3) and therefore the proposal satisfies this provision.	
g) The overall height of the roof of the extended building would be greater than 7 metres higher than the highest part of the existing roof (not including existing plant)	The overall height of the roof of the extended building would not be greater than 7 metres higher than the highest part of the existing roof (not including existing plant) and therefore the proposal satisfies this provision.	
h) The extended building (not including plant) would be greater than 30 metres in height	The extended building (not including plant) would not be greater than 30 metres in height and therefore the proposal satisfies this provision.	

<p>i) Development under Class A.(a) would include the provision of visible support structures on or attached to the exterior of the building upon completion of the development</p>	<p>Development would not include the provision of visible support structures attached to the exterior of the building upon completion of the development and therefore the proposal satisfies this provision.</p>	
<p>j) Development under Class A.(a) would consist of engineering operations other than works within the existing curtilage of the building to-</p> <p>i) Strengthen existing walls;</p> <p>ii) Strengthen existing foundations; or</p> <p>iii) Install or replace water, drainage, electricity, gas or other services</p>	<p>Development would not involve engineering works other than within the existing curtilage to:</p> <p>i) Strengthen existing walls</p> <p>ii) Strengthen existing foundations; or</p> <p>iii) Install or replace water, drainage, electricity, gas or other services.</p> <p>The proposal therefore satisfies this provision.</p>	
<p>k) In the case of Class A.(b) development there is no existing plant on the building</p>	<p>There is no existing plant on the building and therefore satisfies this provision.</p>	

l) In the case of Class A.(b) development the height of any replaced or additional plant as measured from the lowest surface of the new roof on the principal part of the extended building would exceed the height of any existing plant as measured from the lowest surface of the existing roof on the principal part of the existing building	No new plant is to be erected as part of the proposal and therefore satisfies this provision.	
m) Development under class A.(c) would extend beyond the curtilage of the existing building	Development would not extend beyond the curtilage of the existing building and therefore the proposal satisfies this provision.	
n) Development under Class A.(d) would- i) Extend beyond the curtilage of the existing building; ii) Be situated on land forward of a wall forming the principal elevation of the existing building; or iii) Be situated on land forward of a wall fronting a highway and forming a side elevation of the existing building	Development would not: i) Extend beyond the curtilage of the existing building ii) Be situated on land forward of a wall forming the principal elevation of the existing building; or iii) Be situated on land forward of a wall fronting a highway and forming a side elevation of the existing building.  The proposal therefore satisfies this provision.	


<p>o) On land or site on which the building is located, is or forms part of-</p> <p>i) Article 2(3) land;</p> <p>ii) A site of special scientific interest;</p> <p>iii) A listed building or land within its curtilage;</p> <p>iv) A scheduled monument or land within its curtilage;</p> <p>v) A safety hazard area;</p> <p>vi) A military explosives storage area; or</p> <p>vii) Land within 3 kilometres of the perimeter of an aerodrome</p>	<p>The proposal is not sited on land that forms part of:</p> <p>i) Article 2(3) land;</p> <p>ii) A site of special scientific interest;</p> <p>iii) A listed building or land within its curtilage</p> <p>iv) A scheduled monument or land within its curtilage</p> <p>v) A safety hazard area</p> <p>vi) A military explosives storage area</p> <p>vii) Land within 3 kilometres of an aerodrome.</p> <p>The proposal therefore satisfies this provision.</p>	
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5.4 As set out in paragraph A.2, the development under class A is permitted subject to the following conditions.


	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
1. Where development under Class A is proposed, development is permitted subject to the condition that before beginning the	a) Transport and highways impacts of the development;	The site benefits from vehicular access to Lyndale, by way of the Durrisdeer House and Ballantrae House estate, which in turn leads onto Hendon Way (A41) which	

	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
development, the develop must apply to the local planning authority for prior approval of the authority as to:		<p>forms part of the strategic road network, an increase in just 3 flats will clearly not result in any detrimental impacts with respect of the transport or highways implications of the proposed development.</p> <p>The site is located in a highly sustainable location. The nearest bus stop is Lyndale Stop U (circa 154m walkable distance away) which is within an accepted walkable distance, as per Manual for Streets, that provides access to a range of destinations and services and amenities.</p>	

	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		<p>The site is situated within close proximity to a range of bus stops along Hendon Way and Finchley Road with Lyndale Stop being (circa 154m walkable distance away as set out previously.</p> <p>Cricklewood Station is within proximity to the site within walking and cycling distance.</p> <p>In the immediate surrounding locality and the wider surrounding area of the site there are numerous services and facilities including multiple High Streets along Finchley Road that include a range of retail, leisure,</p>	



	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		employment and other uses.	
	b) Air traffic and defence asset impacts of the development;	The nearest major airport is Heathrow Airport located circa 22.5km (the site is also circa 14km from Elstree Aerodrome), and the height of the resultant development would not interfere with air traffic, nor is the application site within an air safeguarding area. The application site is also not near to any assets belong to and areas safeguarded by the Ministry of Defense.	

	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
	c) Contamination risks in relation to the building;	The proposed additional storeys will not involve any intrusive ground works and will serve an existing non hazardous residential use into an equally non hazardous residential use. The planning history records reveal no concerns regarding contamination.	
	d) Flooding risks in relation to the building;	According to the Environment Agency's Flood Map for Planning, the application site lies entirely in Flood Zone 1 categorized as an area at the lowest probability of fluvial or tidal flooding. It is not susceptible to surface water flooding. In any event, the development proposal is to be	


	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		located on the topmost storey of the building. As such, taking into account the circumstances of the proposal, it is concluded that the development would not result in flood risk on site.	
	e) The external appearance of the building;	<p>The use of light grey cladding combined with a green sedum roof provides an appropriate design response of just two additional stories that would provide a sensitive contemporary addition to the existing building resulting in no adverse impacts on the scale and position, as well as the appearance of the floors below.</p> <p>The site is already screened by existing vegetation and</p>	






	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		<p>boundary trees, that will be retained, which acts a visual screen between the building and adjacent residential properties – minimizing any visual impacts.</p> <p>Directly adjacent to Mackellar House on the same side of Burgess Hill is Burnet House which is of a total of 5 stories, however it should be noted that this property is set on higher ground to that of Mackellar House.</p> <p>Furthermore, there are also examples of 4 and 5 and up to 8 storey buildings found throughout the immediate locality that are on higher ground</p>	



	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		<p>than that of Mackellar House which are modern in appearance. Most notably, there is an 8 storey building under construction on the corner of the Hendon Way / Finchley intersection.</p> <p>The proposed development will bring the block to of an acceptable height relative to the buildings found in the immediate surrounding area ensuring the proposal due to its scale easily assimilates into its immediate context of existing built form and the street scene, therefore is considered acceptable.</p>	

	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		The external appearance of the building and the site's context is discussed further in Section 6 of this Statement.	
	f) The provision of adequate natural light in all habitable rooms of the new dwellinghouses;	As shown on the proposed floorplans, each habitable room would have at least one window allowing natural light to permeate and provide a high-quality living environment.	
	g) Impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light;	<p>The additional storeys, comprising of two, would not materially harm the residential amenities of neighbours or future occupiers.</p> <p>The Daylight and Sunlight Assessment, which forms part of the submission, concludes that the</p>	

	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		<p>proposal is acceptable in terms of BRE guidelines.</p> <p>The Daylight and Sunlight Assessment concludes that overall the proposed development with respect to daylight and sunlight the complies with Class A 'New dwellinghouses on detached blocks of flats' of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO 2015).</p> <p>Specifically, The Assessment states:</p> <p><i>"will not cause the loss of light to adjoining or</i></p>	

	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
		<p><i>neighbouring properties, and will provide an adequate provision of natural light in the proposed habitable rooms.”.</i></p> <p>With the above considered, the application proposal would not generate noise that would raise any issues of disturbance by noise and tranquillity.</p>	
	h) Whether because of the siting of the building, the development will impact on a protected view identified in the Directions Relating to Protected Vistas dated 15 March 2012 issued by the Secretary of State	The development will not impact on a protected view identified in the Directions Relating to Protected Vistas.	

	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
	i) Where the existing building is 18 metres or more in height, the fire safety of the external wall construction of the existing building	The building is less than 18 metres in height; therefore, this criterion is not applicable.	
	j) Where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building	Not applicable.	
2.	Any development under Class A is permitted subject to the condition that it must be completed within a period of 3 years starting with the date prior approval is granted	Noted.	
3.	Any development under Class A is permitted subject to the condition that before beginning the development, the developer must provide the local planning authority with a report for the management of the construction of the development, which sets out the proposed development hours of operation and how any adverse impact of noise, dust, vibration and traffic on occupiers of the building and adjoining owners or occupiers will be mitigated	Noted.	
4.	The developer must notify the local planning authority of the completion of the development as soon as reasonably practicable after completion	Noted.	

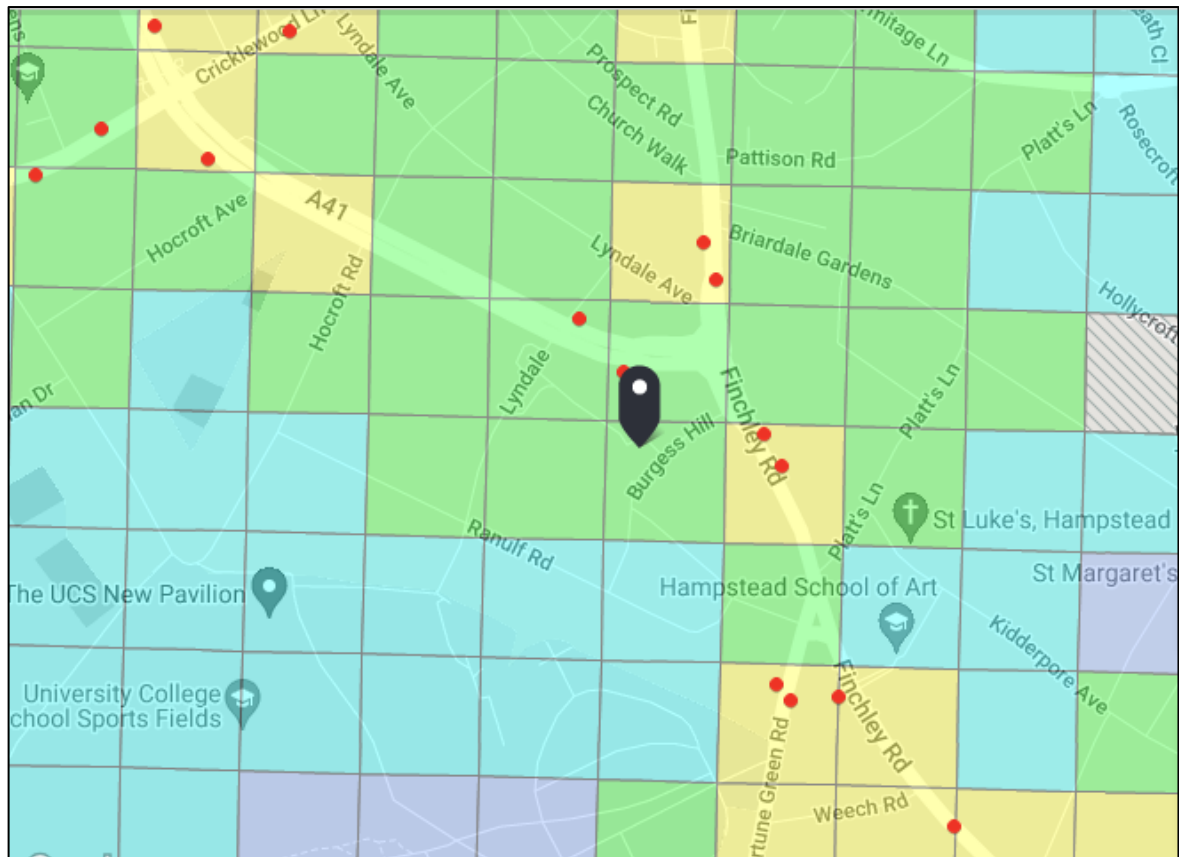
	Development is not permitted by Class A if:	How does the proposal accord with requirements set out in Paragraph A.1	Does the proposal accord with requirements
5.	The notification referred to in sub-paragraph (4) must be in writing and must include- a) The name of the developer b) The address or location of the development; and c) The date of completion	Noted.	
6.	Any new dwellinghouse created under Class A is to remain in use as a dwellinghouse within the meaning of Class C3 of the Schedule to the Use Classes Order and for no other purpose, except to the extent that the other purpose is ancillary to the primary use as a dwellinghouse	Noted.	

## 6. Design Context and Rationale

- 6.1 Mackellar House is a three storey building in a typical Art Deco style of its age. It is designed symmetrically, with a central entrance and stairwell behind a vertical glazed screen, which is further emphasised by a projecting element framing around it, with a higher parapet. The building sits half a storey down from the street level and is screened by trees both from the front and the rear.
- 6.2 The area is predominantly residential with 2-storey and 3-storey detached and semi-detached houses with pitched roofs, as well as larger 3-5 storey blocks of flats of mixed style which characterise the Hendon Way/Finchley Road Junction. Some of these buildings have a flat roof, including Ballantrae House directly behind MacKellar House as well as Cascades Apartments at 368-372 Finchley Road, which is of a more traditional style with a modern rooftop extension. MacKellar House sits between a 3.5-storey Victorian house with a roof and 2-storey detached house with a roof and currently forms the lowest building in the street. A new development is under construction in the corner of Burgess Hill with Finchley Road, roughly 50m from MacKellar House, the height of which ranges between 3 and 8 storeys. One can easily observe a natural stepping down of the heights from the north end of the road going south, with the new development in the corner, followed by the 5-storey mid-century block, the 3.5-storey Victorian house, and then Mackellar House and the two-storey houses that follow.
- 6.3 The proposal of the 1.5 storey extension will nicely continue the stepping down, sitting below the ridge of the 3.5-storey house to the north and approximately half a storey higher than the 2-storey house to the south. Its lightweight design with the large, glazed screens and the recessed top floor will be a nice addition to the streetscape, without causing any adverse impacts on the neighbouring building. Moreover, the proposed sedum roofs will provide double benefits, with environmental gains for the building and the wider area and improvement of its aspect in the townscape.

## 7. Transport and Highways

- 7.1 The application site is located in an identified sustainable location with numerous shops, services and facilities being easily accessible on foot and by cycle and falls within Public Transport Accessibility Level (PTAL) 3, as shown in Figure 5 below.



**Figure 4: PTAL Map courtesy of TFL with green denoting zone 3**

- 7.2 The application site is also located within walkable distance from Finchley Road and Hendon Way that provides accessibility to a range of bus services enabling connectivity to various destinations within the more immediate and wider area, therefore it can be considered that the application future occupiers of the proposed dwellings would be able to access a full range of services and facilities.
- 7.3 In addition, it should be noted within the application zone, future occupiers would naturally be encouraged to optimise sustainable transport options as set out above. Additionally, 3 cycle storage spaces and 6 new sheltered cycle storage spaces are proposed that would be provided to further encourage the use of sustainable transport options.

- 7.4 The existing access will continue to be utilised which is considered appropriate to serve the proposed use only with only three new dwellings.
- 7.5 Satisfactory visibility standards could be easily maintained in both directions. It is considered that there is sufficient capacity on the local highway network to accommodate the number of vehicular movements forecasted to be generated by just three dwellings without giving cause to any adverse impacts on capacity. It is noted that the [www.crashmap.co.uk](http://www.crashmap.co.uk) website records no highway incidents in the immediate locality of the application site in the last five years, indicating that there are no significant issues with the layout of the surrounding highway.
- 7.6 Overall, the cumulative effects of nearby developments alongside the effects of the application proposals are not severe and would not have an unacceptable impact on highway safety. Therefore, the application proposals are in accordance with paragraph 116 of the NPPF alongside other relevant policies contained within the NPPF, therefore it is reasonable to conclude that the proposed use is acceptable in terms of potential transport and highway impacts.

## 8. Nationally Described Technical Housing Standards

8.1 The housing standards set out requirements of floor areas and dimensions for new dwellings and, notably, bedrooms, storage, and floor to ceiling height. These standards must be complied with. Thus, with respect to each we can confirm that:

- 10 (a) the dwellings provide at least the gross internal floor area and built-in storage set out in figure 1 shown in the technical housing standards, and the proposal therefore satisfies this provision.
- 10 (b) dwellings with two or more bedspaces have at least one double (or twin) bedroom, and the proposal therefore satisfies this provision.
- 10 (c) in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m<sup>2</sup> and is at least 2.15m wide and therefore satisfies this provision.
- 10 (d) in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m<sup>2</sup>, and therefore satisfies this provision.
- 10 (e) one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide, and therefore satisfies this provision.
- 10 (f) any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m<sup>2</sup> within the Gross Internal Area), and the proposal therefore satisfies this provision.
- 10 (g) any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all, and the proposal therefore satisfies this provision.
- 10 (h) a built-in wardrobe counts towards the Gross Internal Area and the bedroom floor area requirements but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m<sup>2</sup> in a double bedroom and 0.36m<sup>2</sup> in single bedroom counts towards the built-in storage requirement, and the proposal therefore satisfies this provision.
- 10 (i) the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area, and the proposal therefore satisfies this provision.

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Figure 5: Minimum gross internal floor areas and storage (m<sup>2</sup>)

## 9. Daylight and Sunlight

- 9.1 The quantity and quality of daylight inside a room will be impaired if obstructing buildings are large in relation to their distance away. The distribution of light in the room will be affected as well as the total amount received. In this instance, given the height of the additional floors, there are no obstructions that would affect the amount of light received. Buildings are sufficiently spaced apart so as to receive adequate levels of daylight.
- 9.2 The BRE1 advises at paragraph 2.1.7 that daylighting may be improved in a number of ways. An obvious one is to increase window sizes; the best way to do this is to raise the window head height because this will improve both the amount of daylight entering and its distribution within the room.
- 9.3 As detailed in the Daylight and the Sunlight Assessment, which forms part of the application submission, the proposal is acceptable in terms of daylight and sunlight and accords with the GPDO.

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<sup>1</sup> BRE Site Layout Planning for Daylight and Sunlight: A guide to good practice (2022)

## 10. Refuse Storage

- 10.1 The existing refuse storage arrangement is that the bins are stored to the rear of Mackellar House in an informal manner and left uncovered.
- 10.2 The proposed refuse storage strategy is to formalise the existing arrangement at Mackellar House. The proposed bin store would be located to rear of Mackellar House to provide for the existing and proposed new flats. The proposed bin store would be covered and secured, consisting of a flat roof and its location to the rear of Mackellar House would easily enable connection to the car turning area to the rear of the building. The location is considered to be suitable for both existing and future residents of Mackellar House given the short distance to the existing block, alongside on the basis that residents would access via a paving area as well as allowing collection operatives to easily access the site safely without an adverse impact on highway safety.
- 10.3 Mackellar House would be served by a bin store located to the rear of the building (see Figure 6 below) to provide 1100L and 240L recycle storage, 1100L refuse storage and 240L food waste storage.



**Figure 6: Extract of Proposed Third Plan**

- 10.4 The nature of the fully enclosed bin store would mean that there would be no odour pollution or fire safety issues arising from the proposed development as the doors for the enclosed bin store would open wholly away from the block of flats at Mackellar House with ventilation towards the rear of the building.

- 10.5 The fully enclosed bin store would be of masonry construction, therefore, by its nature it would provide suitable protection in the event of a fire and would allow one hour fire protection that could be upgraded to 2 hour through the addition of internal fire board if deemed necessary.

## 11. Conclusion

11.1 This Planning Statement has been prepared in support of an application for *'Prior Approval Notification for two additional storeys'* application made under Schedule 2, Part 20, New Dwellinghouses Class A *'New dwellinghouses on detached blocks of flats'* of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO 2015) at MacKellar House, Burgess Hill, London, NW2 2DB.

11.2 The proposed development would deliver numerous public benefits which are explicitly linked to the three overarching objectives of achieving sustainable development as set out in paragraph 8 of the NPPF;

- The provision of additional dwellings would make a useful contribution to the Council's housing requirements and the proposed development would amount to efficient use of land in a highly sustainability location which has good accessibility to a range of services and facilities;
- The proposal would benefit the economy through construction and additional footfall of future occupants which would support the local economy through their expenditure;
- The design and finish are appropriate to the locality and would add interest to the street scene;
- Development could feasibly be designed to avoid harm to neighbor amenity and ensure that a comfortable relationship subsists;
- The Council will benefit from increased tax revenues to support local services and future residents will contribute towards the local economy by providing additional custom and support new enterprises and employment in Camden;
- A suitable and safe access arrangement could be achieved; and
- The additional dwellings would be of very high-quality and would confirm to modern building standards, meet national Technical housing standards and environmental standards via incorporating energy efficient features upon delivery.

11.3 This Statement demonstrates, alongside the supporting documentation that accompanies this application, that the proposed application for two additional storeys complies with the criteria set out in the GPDO and relevant local planning policies.

11.4 The applicant therefore respectfully requests that this Prior Notification application be approved without delay and that prior approval should be granted.

- 11.5 It is trusted that the necessary information has been provided to enable the application to be determined, however if any additional information is required it can be provided by the applicant.
- 11.6 In accordance with paragraph 39 of the NPPF, the applicant would like to work proactively with the Council to reach a positive conclusion.