

Proposed Residential Development  
Kay Court  
368-372 Finchley Road  
London NW3 7AJ

Design and Access Statement

September 2011



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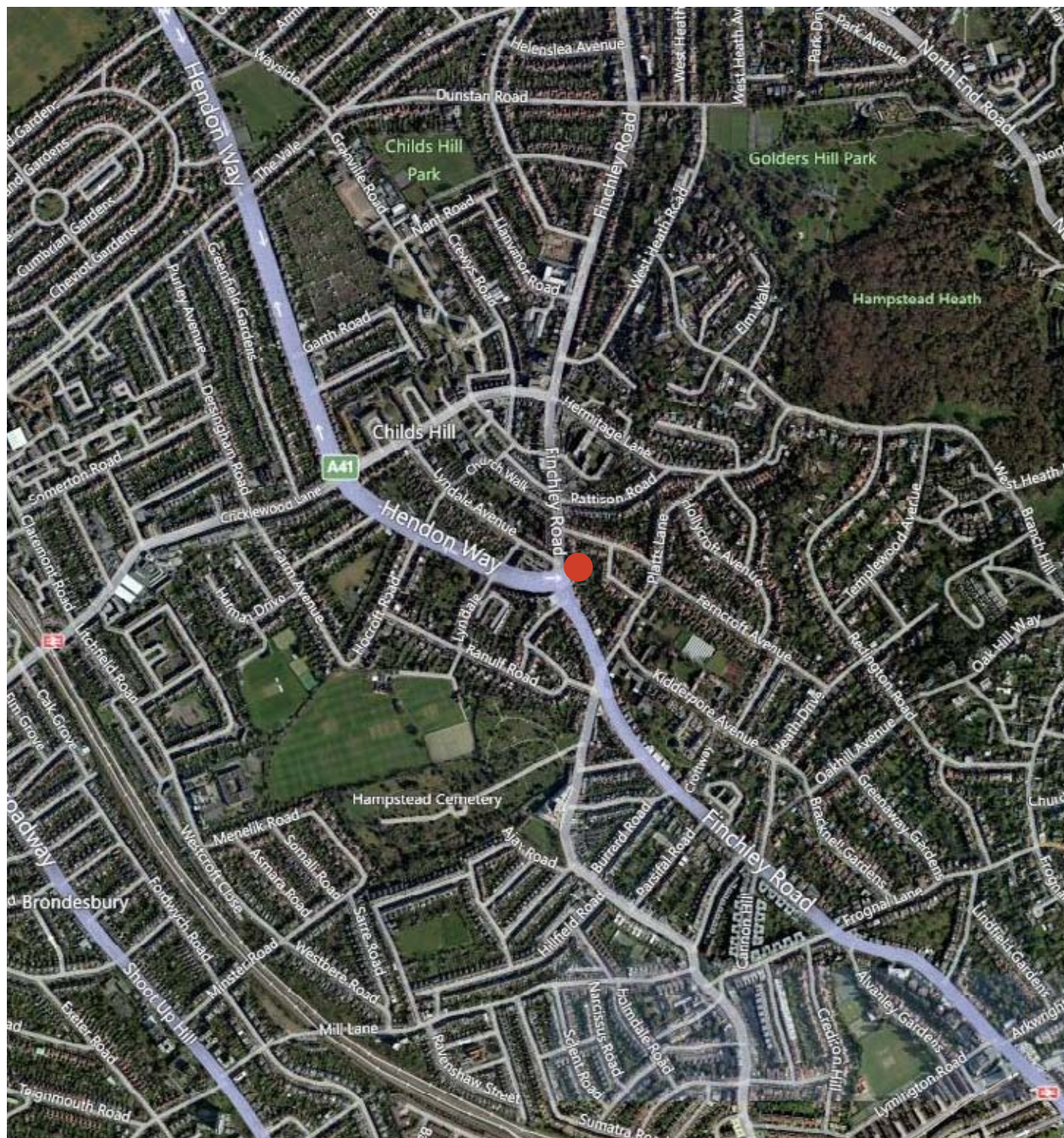
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## 1.0 Introduction

21st Architecture have been appointed by Jewish Care in May 2011 to explore the redevelopment of Kay Court, an existing Care Home site at 368-372 Finchley Road, Camden, London NW3 7AJ.

The following document outlines the proposals generated by the design team for the site together with the architectural intent and external appearance of the proposal. The full Planning Application will also include reports on the following;

- Transport
- Acoustic
- Sunlight / Daylight Assessment
- M + E Strategy
- Structural Strategy
- Sustainability
- Ecology



Site Plan - Site circled in Red



## 2.0 Site and Surrounding Context

### General Site Information

The site is situated on Finchley Road and was until recently a care home operated by Jewish Care.

Redevelopment of this particular site holds significant opportunities to improve the quality of the streetscape and to add a building of strong architectural merit to this site.

Positioned near a main distributor road (Hendon Way/Finchley Road) and priority bus route to Finchley Road Station while within walking distance of Cricklewood National Rail Station, with a PTAL rating of 4, surrounded by residential properties, the site is well served and appropriate for a residential use.

The site is surrounded to the north, south and east by existing 3-storey semi-detached housing, and to the west with a mix of 4-5 storey housing and Commercial on Finchley Road. The wider surrounding area provides access to a variety of facilities, shops and convenience stores within the area.

The rear of the site itself lies adjacent to a Conservation Area.



368-372 Finchley Road, aerial photograph - Site indicated in red



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## 2.1 Site and Surrounding Context

### Conservation Areas

The site is adjacent to Redington and Frognal Conservation area, which has predominantly early 20th century modest Arts and Crafts houses designed by the Architect Charles Quennell and developer George Hart. The existing buildings on the site are neither listed nor locally listed.



Redington and Frognal Conservation Area adjacent to site - Site outlined in red

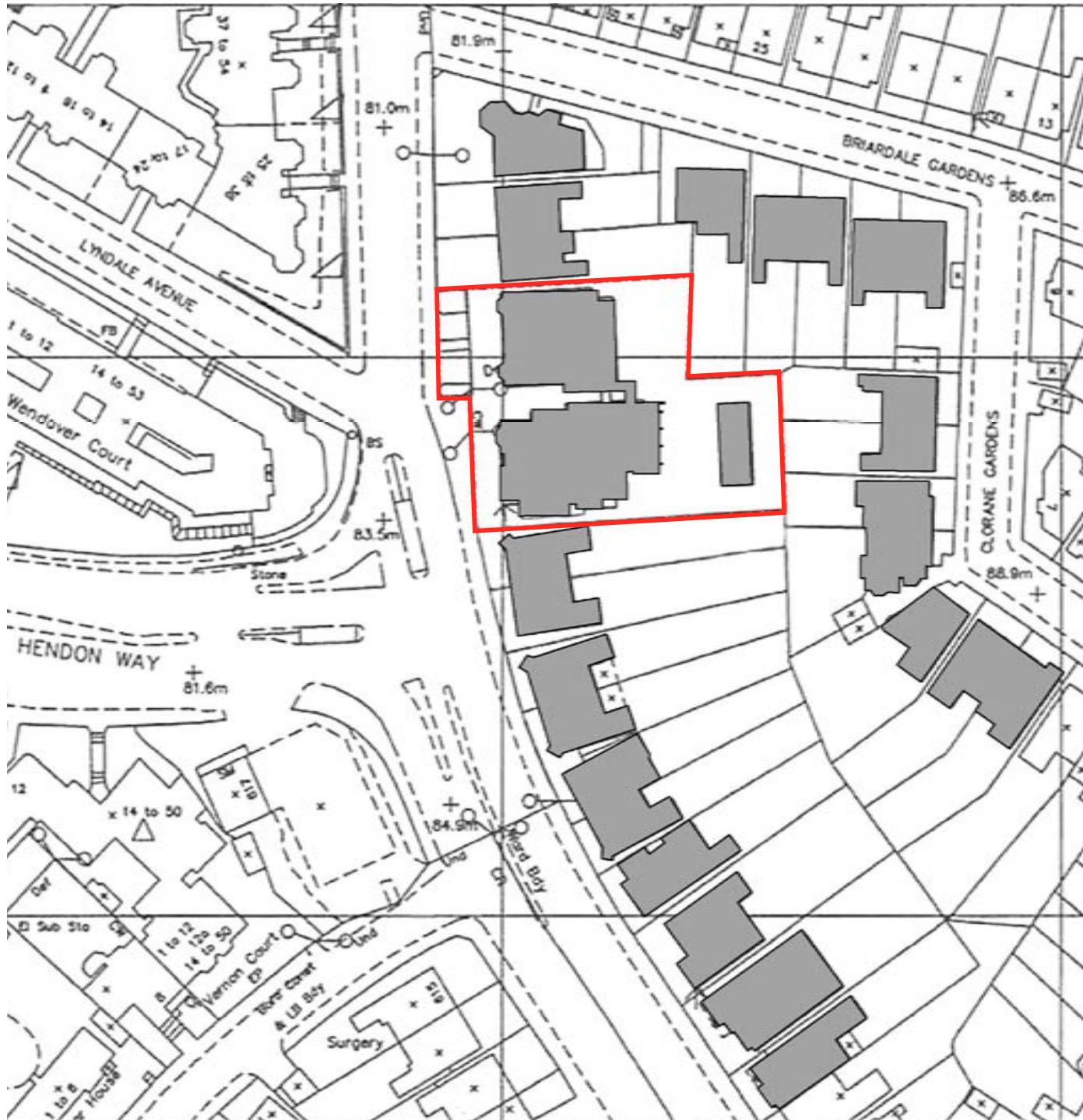
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## 2.2 Site and Surrounding Context

### Urban Design Assessment

The principal characteristics of the site are listed below:

- Many of the adjacent properties are residential and of a similar or larger scale than the proposed scheme.
- The site has a substantial frontage to Finchley Road with an opportunity to continue the pattern and scale of residential development prevalent along the road.
- Many of the adjacent properties are residential and of varying scale along this stretch of Finchley Road with a mix of semi-detached housing, both new and Victorian.
- Although not located within the adjacent conservation area, the rear of the site backs onto the conservation area.



Existing Building Footprint



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2.3 Site and Surrounding Context

Aerial Site Photographs



Aerial view -Facing East



Aerial view - Facing North



Aerial view - Facing West



Aerial view - Facing South



2.4 Site and Surrounding Context

Existing Buildings

The site comprises two separate buildings – the main building at 368 Finchley Road which is a part three/part four storey detached property together with No’s 370/372 Finchley Road, a three storey property (including the rooms within the roof space) that was formerly a pair of semi-detached houses.

The two buildings have an enclosed corridor link at ground floor level and are also linked at upper floor levels albeit only as part of an open emergency means of escape between the two buildings. At the rear of No.368 is a single storey detached building. The site has an overall area of 0.22 hectares. The site and buildings are currently vacant, the previous residential care home for the elderly having closed in late August 2010.

The accommodation incorporates three communal lounges, two dining rooms, surgery, other communal rooms, 57 single bedrooms (each with en-suite toilet and wash hand basin) and 8 assisted bathrooms. The main building has a total of approximately 1,350sqm floor space; the annex 673sqm and the single storey detached building 81sqm giving rise to a total floor area of approximately 2,104sqm. The Operations Licence has lapsed and the building currently does not comply with the National Minimum Standards-Care Homes Regulations.



Existing Building Footprint





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2.5 Site and Surrounding Context

Site Parameters

Key



Sunpath



Busy Main Road



Site Analysis





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2.6 Site and Surrounding Context

Finchley Road Context



Elevation A - From site to corner of Platts Lane (not in Conservation Area)



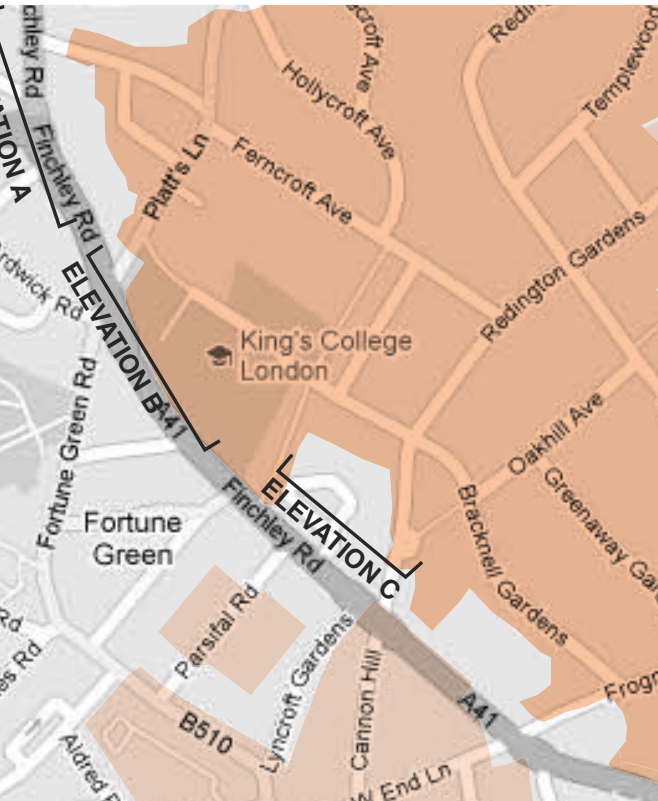
Elevation B - Within Conservation Area (to corner of Croft Way), Westfield Lodge Development to rear of block



Elevation B - continued.



Elevation C - From Studholme Close to corner of Redington Gardens (Conservation Area is further down along Redington Gardens)





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2.7 Site and Surrounding Context

Site Photographs

Neighbouring and other nearby properties on Finchley Road are in residential use – single family dwellings, Houses in Multiple Occupation and flats.

No’s. 374/376 Finchley Road are a semi-detached pair of properties, with an overall height similar to No’s.370/372.

No.368 is taller than neighbouring properties as it has a full top floor of accommodation rather than being within a pitched roof.

No’s.364/366 are semi-detached houses with a lower overall height.

There are several large blocks of flats opposite the site.



View across Finchley Road from site



View North of Finchley Road with site



View North along Finchley Road



View of Site looking South along Finchley Road



View of Site looking East





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2.7 Site and Surrounding Context

Site Photographs

The front of the site has a confused mix of end on parking and a parking forecourt with a series of pedestrian ramps.

Generally the hard and soft landscape treatment is very poor. There is no separation of ‘buffer’ zone between accommodation and road.



View across Finchley Road from site



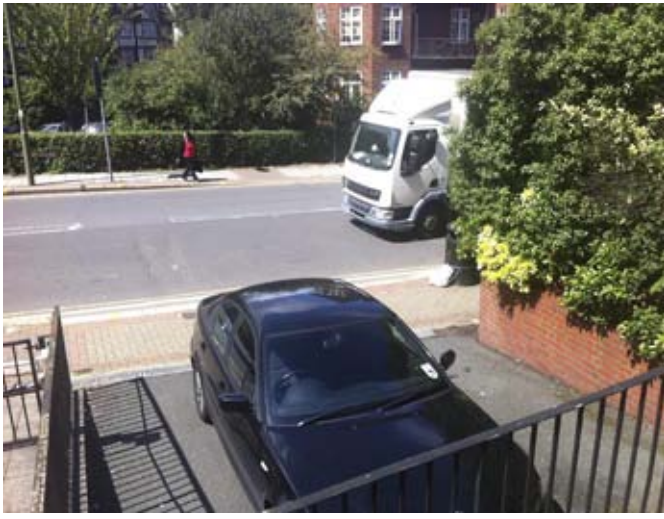
View North of Finchley Road with site



View of existing off road parking forecourt



View of end on parking off road



View of end on parking off road



View of end on parking off road



View of end on parking off road



View of existing access



View of existing access



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2.7 Site and Surrounding Context

Site Photographs

The rear of the site is defined by a mature landscaped boundary to the east between the site and the neighbouring Conservation area gardens.

The existing gardens are tiered towards the rear of the site and also enjoy good mature screening on the north and south boundaries with the adjacent properties.



View of rear looking SW



View of Bungalow showing mature screening to east of site



View of rear looking NW

3.0    Consideration of relevant  
Government Advice and Policies

1.        This section of the Statement comments on the proposals in the context of relevant Government advice and planning policies.

**Government Advice**

2.        The proposal is for a sustainable form of development in accordance with the requirements of PPS1. The development will be of high quality inclusive design which is considered to improve the character and quality of the area. The site is eminently suitable for residential development being appropriately located in terms of accessibility by public transport and with good access to jobs, health, education, shopping, leisure and community facilities. The development also makes efficient use of the land and brings a vacant site back into use. In this respect, as will be discussed below in the context of Camden's Local Development Framework, it is not possible to reinstate the former residential care home use, given the limitations of the existing buildings.
3.        Additional statements have been submitted as part of the application in respect of sustainable design and construction and also ecology, responding to relevant aspects of PPS1.
4.        As regards the advice contained within PPS3 the proposals provide for an appropriate mix of housing including affordable housing; the site is within a suitable location being surrounded by residential development; the proposals make efficient use of land contributing to the national target that at least 60% of new housing be provided on previously developed land; and the design ensures that an efficient use of the land is made. Whilst the density may be higher than that on neighbouring sites it is clear from PPS3 that this does not render the proposals unacceptable. Indeed Para 50 advises that the density of existing developments should not dictate that of new housing by stifling change or requiring replication of existing style or form.
5.        The Transport Statement comments on the proposals in the context of relevant aspects of PPG13, demonstrating that the site benefits from good public transport accessibility, pedestrian provision and cycle provision. There will be no detrimental impact on the surrounding public transport services or highway infrastructure.
6.        Matters in respect of the requirements of PPS22 are dealt with in the Sustainable Design and Construction Statement which details the implementation of sustainable systems for energy, water, waste management, recycling and the use and choice of

- materials.
7.        Matters in respect of noise and PPG24 are detailed in the Environmental Noise Assessment which demonstrates that, subject to appropriate mitigation measures (which could be the subject of a condition on any planning permission), an adequate level of protection against external noise can be achieved.
- The London Plan**
8.        With the development providing for 24 additional dwellings the proposals clearly comply with Policy 3.3 by increasing housing supply. They help contribute to Camden's target of 665 additional dwellings per year. Likewise in accordance with the requirements of Policy 3.4 the proposals optimise the housing potential of the site, as appropriate to the locality. As the Transport Statement identifies, the site has a Public Transport Accessibility Level (PTAL) of 4 and given that the site is within an urban area, it is clear from Table 3.2 that development should be at a density of between 200 and 700 habitable rooms per hectare. The site has an overall area of 0.22 hectares; the proposals incorporate a total of 77 habitable rooms; the development therefore gives rise to a density of 350. This clearly falls within the range as set out at Table 3.2.
9.        The design of the proposed development complies with requirements of Policy 3.5 in that it will enhance the quality of the locality. As is demonstrated, the scale and design takes into account the surrounding context and local character as well as relationship with neighbouring properties. This ensures that the development is appropriate in terms of its visual appearance and relationship with neighbouring properties also in terms of ensuring that it has no detrimental impact on neighbouring occupiers.
10.       Policy 3.5 cross-refers to minimum floor space standards as set out in Table 3.3. As can be seen from the Floor Area Schedule all units – both private and affordable – generously comply with these minimum standards.
11.       In accordance with Policy 3.8 the proposals incorporate a range of accommodation in terms of unit sizes within both the private and affordable housing elements of the development. All units will be built to Lifetime Homes Standards with 10% being wheelchair accessible or easily adaptable for residents who are wheelchair users.





### 3.0 Consideration of relevant Government Advice and Policies

12. The proposals incorporate an appropriate level and type of affordable housing in accordance with relevant aspects of Policies 3.10, 3.11, 3.12 and 3.13.

13. Policy 3.14 protects existing housing. It is evident from Para 3.83 that this includes premises with an element of care (such as the lawful use of the site). Matters in respect of the redevelopment and the loss of the existing use are discussed in the context of relevant aspects of Camden's Local Development Framework.

14 As regards that aspect of the proposed development relating to climate change, as the Sustainable Design and Construction Statement details, the proposals enable carbon reduction of approximately 25.12%, with renewables contributing 11.07%. This ensures that the development will comply with Policy 5.2.

15. As regards Policy 5.3 the additional supporting documents address the issues in respect of all relevant aspects. The Ecology statement demonstrates that there will be no harm in terms of bio-diversity.

16. Matters in respect of Policy 5.7 and the issue of renewable energy are discussed in detail in the Sustainable Design and Construction Statement.

17. The Transport Statement addresses all relevant aspects of those policies of The London Plan relating to transport. In particular the proposed development provides for appropriate cycle parking in accordance with Policy 6.9 and also complies with maximum car parking standards as referred to in Policy 6.13 and Table 6.2. Given that the site has a PTAL rating of 4 (and thus whilst of good accessibility does not have high accessibility), it is considered desirable and appropriate to incorporate on-site parking since, as discussed in the Transport Statement this can be achieved without harm to pedestrian or highway safety.

18. As to the design of the proposed development it is considered that this complies with Policy 7.4 having regard to the pattern and grain of nearby sites in the area. The architecture complies with Policy 7.6 being of high quality; enhancing the public realm; comprising details and materials that compliment the local architectural character; and not causing any unacceptable harm to the amenity of the surroundings. In this respect the policy refers in particular to privacy and overshadowing. The design and position of windows ensures no overlooking of neighbouring properties or their gardens. As the Daylight and Sunlight Report demonstrates, there will be no harm caused to neighbouring properties given the layout of those properties and

the absence of any nearby windows to habitable rooms that would be affected by the proposals.

#### **Local Development Framework**

19. We comment below on the proposals in the context of relevant policies of the Core Strategy and Development Policies Documents.

20. In accordance with Policy CS4 the proposed development respects the character of its surroundings. It is not within a Conservation Area. Whilst its rear boundary adjoins the Redington/Frognall Conservation Area it is not considered that the proposals, being a street frontage development, have any direct impact on the Conservation Area. Indeed if there is any impact as a result of the proposals it is considered that this would be a benefit given the intended removal of the large single storey building at the rear of the site. Likewise the development thus also complies with Policy CS14.

21. The proposed development has been designed so as to ensure no impact on neighbouring occupiers. The Sunlight and Daylight Report shows there will be no harm caused as a result of loss of light. The design of the proposals ensures that there will be no overlooking of neighbouring properties or their gardens. The development, generally, is considered to protect the environment. The proposals provide accommodation to meet the needs of Camden's population. As demonstrated in the Sustainable Design and Construction Report, the proposal will be sustainable in all respects. Thus all relevant aspects of Policy CS5 are complied with.

22. The proposed 24 dwellings will be of good quality helping contribute towards the housing target as referred to in Policy CS6. The maximum reasonable amount of affordable housing is incorporated in accordance with the sliding scale in Policy DP3 (discussed below). An appropriate mix of housing is also provided in terms of unit sizes, as required by the policy.

23. Matters in respect of Policy CS13 are discussed in the Sustainable Design and Construction Statement which demonstrates how policy requirements will be met.

24. Matters relating to Policy CS15 are discussed in the Ecology Survey which includes the bat inspection. The documentation demonstrates that the proposals will cause no harm to matters relating to ecology, habitat and bio-diversity.



### 3.0 Consideration of relevant Government Advice and Policies

25. Generally the proposals are considered to maximise the potential of the site for providing housing in accordance with the requirements of Policy DP2. As required by the policy the proposed development ensures no net loss of residential floor space.

26. Policy DP3 refers to a sliding scale for the amount of affordable housing a development is required to provide. This refers to 10% affordable housing requirement for developments with a capacity for 10 dwellings and 50% for developments with a capacity for 50 dwellings. The pre-application feedback also referred to 30% for schemes of 30 units. The proposals provide a total of 24 units. The proposed breakdown between private and affordable housing is thus considered to comply with Policy DP3 with 25% of the accommodation on the basis of number of units being affordable; 21% on the basis of the number of habitable rooms and 22.2% on the basis of floor area.

27. It is considered that the mix of unit sizes accords with the requirements of Policy DP5 taking into account the character of the site, location and proposed development. A mix of large and small homes is incorporated. In accordance with the Table at Para 5.4 the majority of the private units are 2 bedroom units; the majority of the affordable units are 2 and 3 bedrooms (4 out of the 6 affordable units having 2 or 3 bedrooms).

28. In accordance with Policy DP6 all units will meet Lifetime Homes Standards and 10% will either meet wheelchair housing standards or be easily capable of adaptation to meet these standards.

29. Policy DP7 has been identified as of particular relevance. This states that the Local Authority will resist the loss of sheltered housing and care homes for the elderly unless adequate replacement accommodation is provided elsewhere or it can be demonstrated that there is a surplus of homes for older people in the area or the existing housing is incapable of beating contemporary housing standards.

30. The previously existing home on the application site has been vacant since September 2010. All previous residents were moved to new accommodation recently developed by Jewish Care.

31. The home was specifically for Jewish residents who require a culturally specific environment. The North Camden area is not sustainable for a Jewish home in this respect. Prior to its closure Kay Court had only 35 residents despite having a total of

60 bedrooms.

32. Jewish Care have recently purchased, converted and refurbished Westmount House, 126 Fortune Green Lane to bring it up to NMCS standards. It re-opened in 2010 as a 32 bed home. In 2010 they also opened a new 54 bed care home plus 48 extra care 1 and 2 bedroom apartments within a 3 mile radius in Golders Green. Jewish Care were able to offer former residents of Kay Court accommodation at both of these and in other care homes that it owns and operates within a 6 mile radius. In addition Jewish Care has a detailed planning application for a 48 bedroom care home within a 5 mile radius, in Barnet, which we understand has Officers support and will go to the Planning Committee with a favourable recommendation in October 2011.

33. This demonstrates that there is adequate replacement accommodation provided elsewhere. Whilst only one of these sites (Westmount House at 126 Fortune Green Lane) is within the London Borough of Camden the pre-application advice made it clear that this was not an issue provided the replacement accommodation would still be accessible to Camden's residents. Reference was made to replacement accommodation within the southern part of the London Borough of Barnet being acceptable in this respect.

34. It is thus considered that adequate and appropriate replacement accommodation is available.

35. In addition the existing building at Kay Court does not meet, and is not capable of meeting, the appropriate contemporary housing standards. When a care home changes hands and requires re-registration it has to comply with "Care Homes for Older People – National Minimum Standards". Unfortunately Kay Court does not. 77% of bedrooms fall well below minimum standards. There is insufficient communal space. There are an insufficient number and ratio of assisted bathrooms and indeed due to the sizes of existing bathrooms it would not be possible to achieve the standard. Very few of the rooms comply with the requirements to have a sink. Installation of en-suite facilities would result in many of the rooms being even further below minimum requirements. Furthermore the incorporation of en-suite facilities suitable for wheelchair users would not be possible without causing further problems in terms of minimum room sizes. Other problematic areas relate to the lifts. They do not reach all floors and sizes are



3.0     Consideration of relevant  
         Government Advice and Policies

insufficient to incorporate a stretcher. Additionally the internal layout and restricted corridor widths result in the building not being suited for nursing care. As the care home use has ceased it could not be re-instated as a Licence to operate would not be granted given the numerous deficiencies of the building.

36.     Policy DP7 makes it clear that the requirements are “either/or”. The above demonstrates that adequate replacement accommodation is provided as well as the existing housing being incapable of meeting contemporary standards. Thus the loss of the care home is justified in the context of this policy.

37.     The proposed car and cycle parking provision complies with Policy DP18 and Appendix 2 in terms of the maximum standards for car parking and minimum standards for cycle parking. Para 18.2 refers to the Council expecting car free developments in Low Parking Provision Areas and other areas with high public transport accessibility. The application site does not fall within either of these definitions. The PTAL rating of 4 demonstrates that the site has good, but not high, public transport accessibility. This is discussed further in the Transport Statement.

38.     Matters in respect of Policy DP22 are discussed in detail in the Sustainable Design and Construction Statement. In accordance with policy requirements and as the statement confirms, the development will meet Code Level 3.

39.     In accordance with Policy DP24 the proposed development will be of a very high standard of design in keeping with the context and scale of neighbouring buildings as the street scene drawings demonstrate. In addition appropriate amenity space is provided with the ability for the development to incorporate appropriate hard and soft landscaping. The development has been designed so as to ensure no detrimental impact on amenities of neighbouring occupiers. Reference has been made above to matters in respect of privacy and light.

40.     For the reasons discussed above it is considered that the proposals comply with all relevant aspect of Government advice, policies of The London Plan and also the London Borough of Camden’s policies as contained within its Local Development Framework.





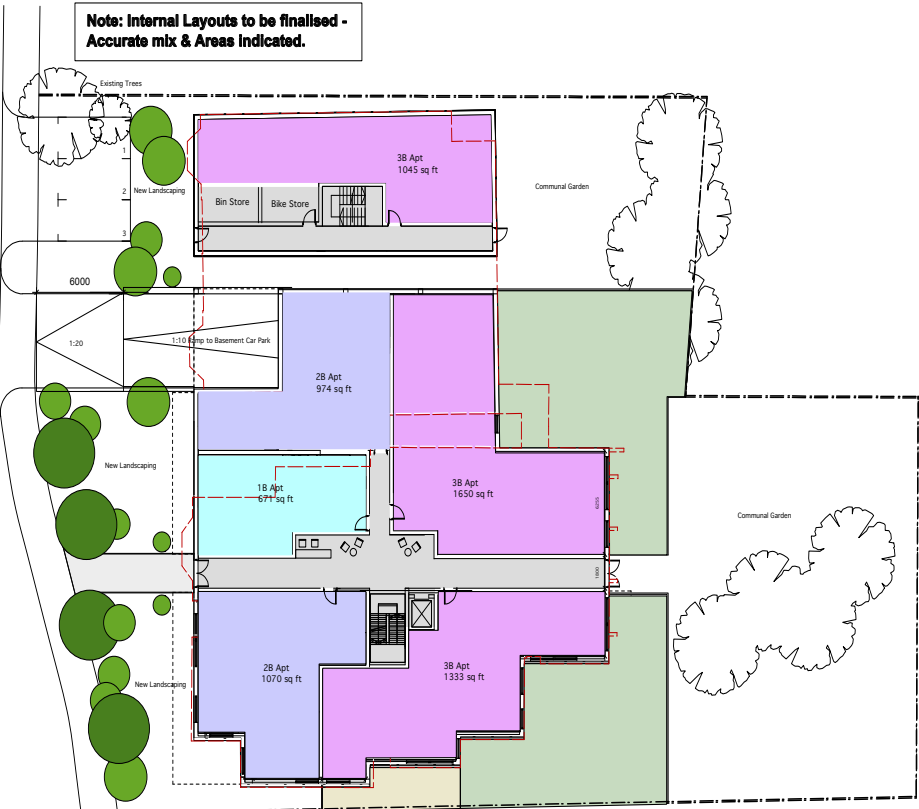
4.0 Pre-Application, Date: 16.06.11

Floor Plans

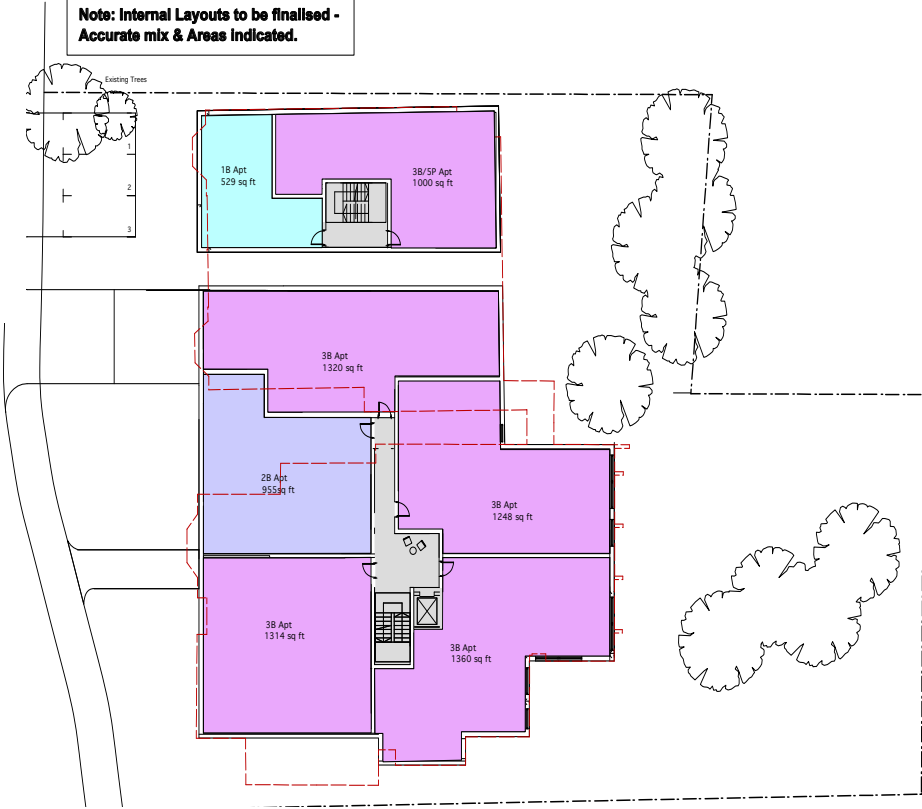
An application outlining initial proposals for the redevelopment of the site was submitted to LB Camden and a Pre Application meeting was held on 16th June 2011 where the principles of the proposals were discussed in broad terms with Neil Cleary of LBC.

The proposal included demolition of existing buildings on the site in order to provide a newly built high quality residential scheme incorporating a mix of both private and affordable residential unit sizes all with private or communal amenity space.

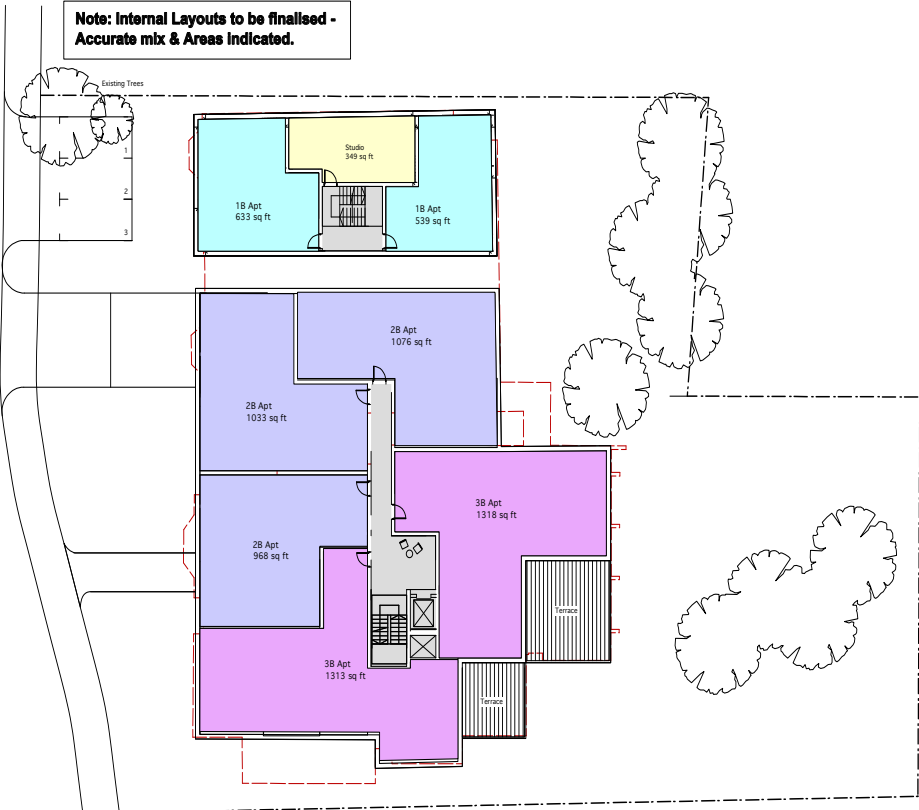
The scheme consisted of two separate blocks, the south block being the larger of the two to accommodate the private residential. The perimeter of the blocks followed the line of the existing footprint and a basement car park was introduced for the private block.



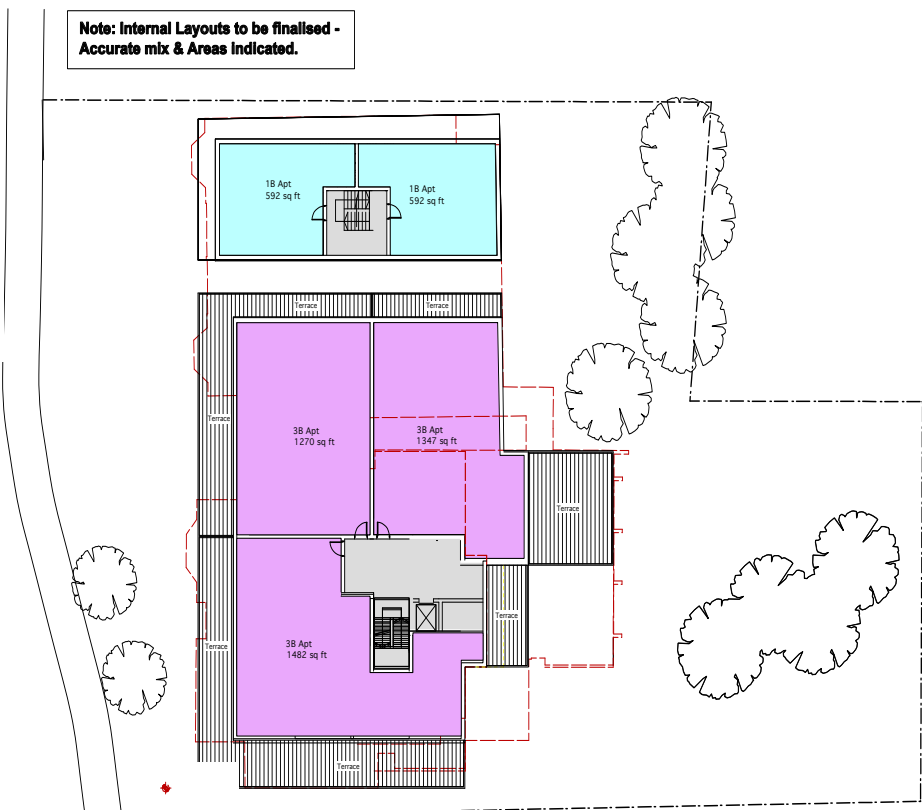
Ground Floor Plan



First Floor Plan



Second Floor Plan



Third Floor Plan



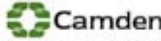
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4.1 Pre-Application, Date: 16.06.11

Letter from Camden Council

Pre-Application feedback was received from Neil Cleary on 6th July. This focused on the in-principle issues, in addition to outlining the Council’s general approach to detailed issues such as housing mix, access and sustainable design and construction.

In general the feedback was positive in terms of the principle of development, although it was acknowledged that more detailed analysis would be required for the full Planning submission to justify the proposals.



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Date: 16/08/2011  
Contact: Neil Cleary  
Direct line: 020 7974 1341  
Email: [Neil.Cleary@camden.gov.uk](mailto:Neil.Cleary@camden.gov.uk)

Mr Paul Keenan  
Twenty First Architecture Ltd  
30 Underwood Street  
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N1 7JQ

Dear Mr Keenan,

**Town and Country Planning Act 1990 (as amended)**  
**Re: Kay Court, 368-372 Finchley Road, NW3**

Further to our meeting of 16<sup>th</sup> June 2011 may I firstly apologise for the late response in follow up to our meeting regarding the above site.

This site is located on the eastern side of Finchley Road opposite its junction with Lyndale Avenue. It comprises two separate buildings, both substantial semi-detached properties of three/four storeys. The building has previously been in use as a residential care home for the elderly, which falls within a C2 use, but has now become vacant. The proposals subject of these pre-application discussions involve the demolition and redevelopment of the site to provide residential (Class C3) accommodation.

Your clients helpfully took some time in the meeting to explain the reasons behind the premises becoming vacant, and outlined their strategy to continue to provide care home provision in the locality. This was extremely helpful and should form the basis of any planning statement which accompanies any future application for redevelopment of this site.

As I'm sure you can appreciate given the early stages of this process, my comments have focused on the in-principle issues, in addition to outlining the Council's general approach to detailed issues such as housing mix, access and sustainable design and construction.

Land use principles:  
The Core Strategy and Development Policy documents of Camden's Local Development Framework have a general presumption to retain residential uses. For the purposes of the LDF a residential care home would fall within the broad definition of a residential use, and the Council would therefore seek to retain such a use.

DP7 of the Development Policies document outlines our detailed approach to sheltered housing and care homes for older people. It states that we will resist the loss of such housing unless;

- adequate replacement accommodation is provided elsewhere; or
- it can be demonstrated that there is a surplus of homes for older people in the area; or
- the existing housing is incapable of meeting contemporary housing standards.

If one of the above can be satisfied we will expect any replacement residential to provide an equivalent amount of floor space for vulnerable people (i.e. hostels for homeless people, accommodation for people with learning difficulties or mental illness) or permanent housing within

make provision for water run-off attenuation measures.

Other issues:  
With regard to the provision of open space CPG guidance requires the provision of 9 sq m of open space per person for residential developments providing 5 or more additional dwellings. Open Space provision will initially be expected to be provided on site. Where a site cannot provide open space provision on site the preferred option would be to provide suitable open space off-site, but at a maximum of 400m from the development. If either of the above are not practical a financial contribution to open space will be acceptable. A financial contribution is based on a proportion of the capital cost of providing new open space, which amounts to £55 per square metre. Full details of the methodology for open space contributions can be found in the CPG.

In addition to the above, all residential developments involving a net increase of 5 or more units will normally be expected to provide a contribution towards education provision in the Borough (excluding any affordable elements of a housing scheme). The contribution sought is proportionate to the size of dwellings proposed, and is not sought for single-bed units, as these are unlikely to house children. Full details of the methodology for educational contributions can be found in the CPG.

Finally, issues regarding highway safety and transportation are, I understand, currently being discussed by your clients appointed Transport Engineers and our Highways Team. I would expect to be able to feed in the outcome of these discussions as the scheme progresses.

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 Team or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 1341.

Yours sincerely,

Neil Cleary  
Senior Planning Officer  
Advice and Consultation Team

use Class C3. The provision of C3 housing would be subject to a contribution towards affordable housing on a site of this size (see DP3 of the Development Policies for full details).

In practice, when considering adequate replacement accommodation there is no direct requirement for it to be located within the borough, particularly if the accommodation has been privately owned and wasn't subject to nominations from the Council. However, what we do seek to ensure is that any replacement accommodation will still be accessible to Camden residents (eg. southern part of LB Barnet). At this stage the background information regarding the on-going need and provision that is met by Jewish Care, as discussed in our meeting, would provide useful justification in the context of this policy, as would the quality of the accommodation previously provided as C2.

As an aside, the specific reference to permanent housing within use class C3 would seem to rule out student housing, which normally falls within sui generis use.

With regard to affordable housing, contributions towards affordable housing are required on sites with a capacity to provide 10 or more dwellings. 'Capacity' for ten units is considered to be 1000sqm or more, so a site such as this, when converting to C3 accommodation, will need to make a contribution to affordable housing. Policy DP3 has introduced a sliding scale in an attempt to encourage more affordable contributions from smaller schemes. This works on a broad basis of 10% affordable housing for schemes of 10 units/1000sqm, 30% for 30 units/3000sqm up to 50% for 50 units/5000sqm+.

On this basis, the area schedule as submitted at 9.0 of your pre-application document suggests that affordable provision is at 30% based on units. Whilst affordable provision on site is of course welcomed, it should be noted that the Council would calculate any affordable provision on a floor space basis. It would be useful to establish at an early stage the overall quantum of affordable/private residential provision in order to begin discussions with regard to any justification/viability appraisals if necessary.

With the above in mind, it is worth noting that in line with the requirements of the policy, the provision of affordable housing will be expected on the application site. Where this can not practically be achieved on site the Council may accept off-site affordable housing or, in exceptional circumstances, a payment-in-lieu. In considering whether an off-site contribution is appropriate the Council will have regard to the criteria (a-f) set out in Policy DP3 and also in the supporting text of the policy at 3.14.

On this issue, the Council welcomes the steps already taken by the applicants to consider the provision of affordable residential floor space on site, and will welcome further discussion on this issue with the aim of securing a quantum and mix of affordable provision that provides high quality accommodation in both the private and affordable sectors.

Finally, please be aware of the need to meet the 16 Lifetime Homes criteria in the context policy DP6 (Lifetime Homes) which states that 10% of homes development should either meeting wheelchair housing standards or be easily adapted to them. If all of the criteria cannot be met a 'best endeavours' exercise should be undertaken by the applicants to justify the reasons why the development cannot meet the criteria. Please refer to DP6 (Lifetime homes and wheelchair housing), DP29 (Improving Access) and CS6 (Providing quality homes).

Design:  
Turning to design issues, this site is not located within a Conservation Area, although it should be noted that the boundary of the Redington/Frognaal Conservation Area runs along the rear boundary of the site. Whilst formal consent is not therefore required for the demolition of these properties, it should be noted that HE8 of PPS5 makes provision for the identification of non designated

heritage assets which would be a material consideration in the determination of applications. In these circumstances it appears that the existing buildings represents the type of building that characterises this part of north London. The buildings are relatively large ¾ storey blocks set within large plots. The properties in this area have a largely consistent plot widths, front and rear boundary lines, and consistent roof and ridge heights. This provides a built vernacular for the area that needs to be carefully considered in any redevelopment of this site.

The Council acknowledges that the current proposals are at the early design stage. With this in mind these comments have been based on the assumption that further dialogue will take place in order to progress the design of the scheme.

Given the fact that there is a clear built form in this location as outlined above, the Council believes that consideration should be given to retaining the elements that make up this vernacular within the redeveloped scheme. In particular, consideration should be given to providing a clearer separation between the two buildings, and on retaining the broad roof heights in the area. To the rear of the property, we are concerned that the redevelopment (particularly at the upper floors) represent an over-development of the site, when considering the layout of neighbouring properties with, as outlined above, consistent building lines and large garden plots.

As outlined above these comments represent an initial overview of the proposals, and the Council will welcome further discussions on this issue to progress the scheme further.

Amenity:  
The amenity of potential occupiers of the proposed residential units and neighbouring occupiers would be a key consideration in any future application of this nature. As such please refer to policies CS5 (Managing the impact of growth and development), DP26 (Managing the impact of development on occupiers and neighbours) and the CPG for further guidance.

Where necessary, daylight and sunlight reports should be submitted assessing the impact of the development on neighbouring windows.

With regard to privacy and overlooking the CPG states that in order to ensure privacy there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. In addition to this, based on the axiometric drawings provided there would appear to be potential overlooking issues to the rear of the site.

All residential units should comply with the residential standards for the overall floor space, bedroom sizes and daylight as set out in Camden Planning Guidance.

Sustainable Design and Construction:  
Please refer to policy DP22 (Promoting Sustainable Design & Construction Code for Sustainable Homes). Please be aware that all new residential schemes will be required to meet as a minimum code level 3. An assessment should be submitted as part of any application submission, with a post construction review to be carried out as part of a legal agreement of any approval.

Developments over 1,000sqm or 10 residential units (including change of use) must include provision renewable energy on site. In line with the requirements of the London Plan new developments should aspire to meet the 20% target.

A full renewable energy statement is required to be submitted as part of any application. Proposed renewable energy technology should follow the Mayors energy hierarchy (1. use less energy, 2. use renewable energy and 3. supply energy efficiently) to show that renewable energy is not just an 'add-on'.

Although this may be included in any Code for Sustainable Homes assessment, you should also



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4.2 Pre-Application, Date: 16.06.11

#### Feedback from Conservation Officer

There were some points raised by the Conservation Officer in terms of the site context and design of the proposals albeit there was acknowledgement that the design was in the very early stages and would require further dialogue with the Conservation officer.

## Design

*“Turning to design issues, this site is not located within a Conservation Area, although it should be noted that the boundary of the Redington/Frognaal Conservation Area runs along the rear boundary of the site. Whilst formal consent is not therefore required for the demolition of these properties, it should be noted that HE8 of PPS5 makes provision for the identification of non designated heritage assets which would be a material consideration in the determination of applications.*

*In these circumstances it appears that the existing buildings represents the type of building that characterises this part of north London. The buildings are relatively large 3/4 storey blocks set within large plots. The properties in this area have a largely consistent plot widths, front and rear boundary lines, and consistent roof and ridge heights. This provides a built vernacular for the area that needs to be carefully considered in any redevelopment of this site.*

*The Council acknowledges that the current proposals are at the early design stage. With this in mind these comments have been based on the assumption that further dialogue will take place in order to progress the design of the scheme.*

*Given the fact that there is a clear built form in this location as outlined above, the Council believes that consideration should be given to retaining the elements that make up this vernacular within the redeveloped scheme. In particular, consideration should be given to providing a clearer separation between the two buildings, and on retaining the broad roof heights in the area. To the rear of the property, we are concerned that the redevelopment (particularly at the upper floors) represent an over-development of the site, when considering the layout of neighbouring properties with, as outlined above, consistent building lines and large garden plots.*

*As outlined above these comments represent an initial overview of the proposals, and the Council will welcome further discussions on this issue to progress the scheme further.”*



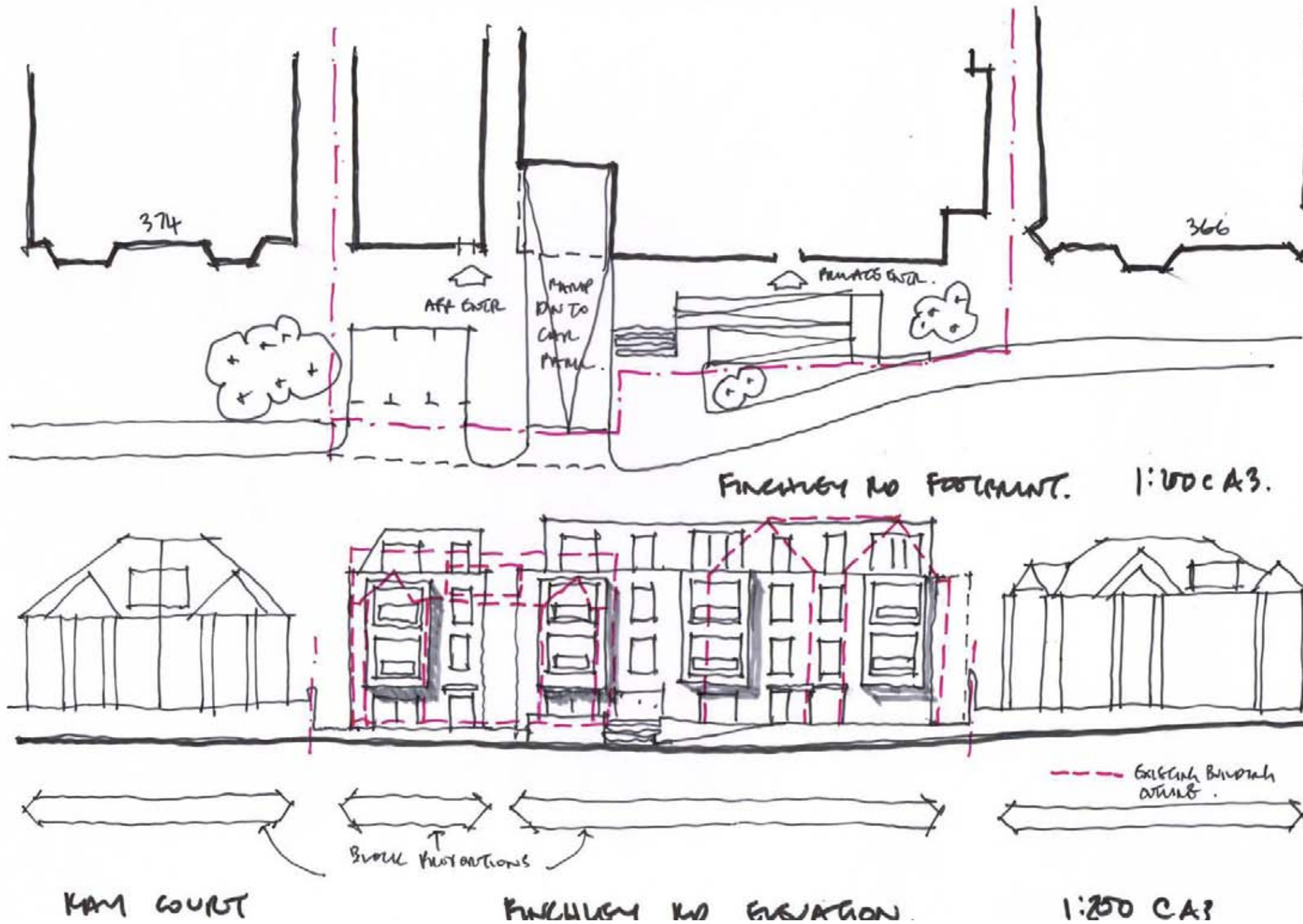


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4.3 Pre-Application, Date: 16.06.11

#### Sketch Street Plan & Elevation

- Block to plot ratio not in keeping with Finchley Road context.
- Varying ridge heights and relationships



## Response

### 1. *“the identification of non designated heritage assets”*

#### Response

The buildings are not listed and are not in the Conservation Area.

Yes – our site adjoins the Conservation Area, however given the boundaries of that designated area the development on the site will not affect the setting, character or appearance of the Conservation area. The proposed buildings on the site are not seen in the context of the Conservation Area and don't affect its setting. In this document we show other contemporary developments located adjacent to Conservation Area boundaries.

The existing buildings are also not fit for purpose.

### 2. *“....it appears that the existing buildings represents the type of building that characterises this part of north London..... largely consistent plot widths, front and rear boundary lines, and consistent roof and ridge heights.”*

#### Response

We have followed the existing footprint and aligned with the prevalent front building line.

We have also altered the scheme to proportionally match the prevalent building elevation scale along Finchley Rd i.e. to read like two buildings of similar frontage –previous scheme had large block / smaller block.

We have generally matched the ridge heights with existing on both blocks.

### 3. *“....rear of the property,.....over-development of the site, .....consistent building lines and large garden plots.”*

#### Response

We have followed the existing footprint at ground floor and stepped back the building at the upper floors generally in line with massing of existing. The massing to the rear is towards the centre of the site and relates to the larger garden depth to rear. The site is heavily screened along the east boundaries by existing mature trees.

In this latest iteration of the scheme we have taken on board and addressed these comments.



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5.1 Pre-Application Response  
Application Date: 16.06.11

Existing & Proposed Footprint

The proposed building footprint is the same as existing with the existing bungalow to rear of site removed.

The proposed building to plot ratio is therefore the same as existing which is relatively consistent along this part of Finchley Road.



Existing Building Footprint



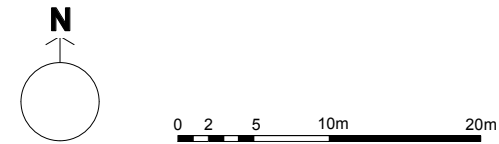
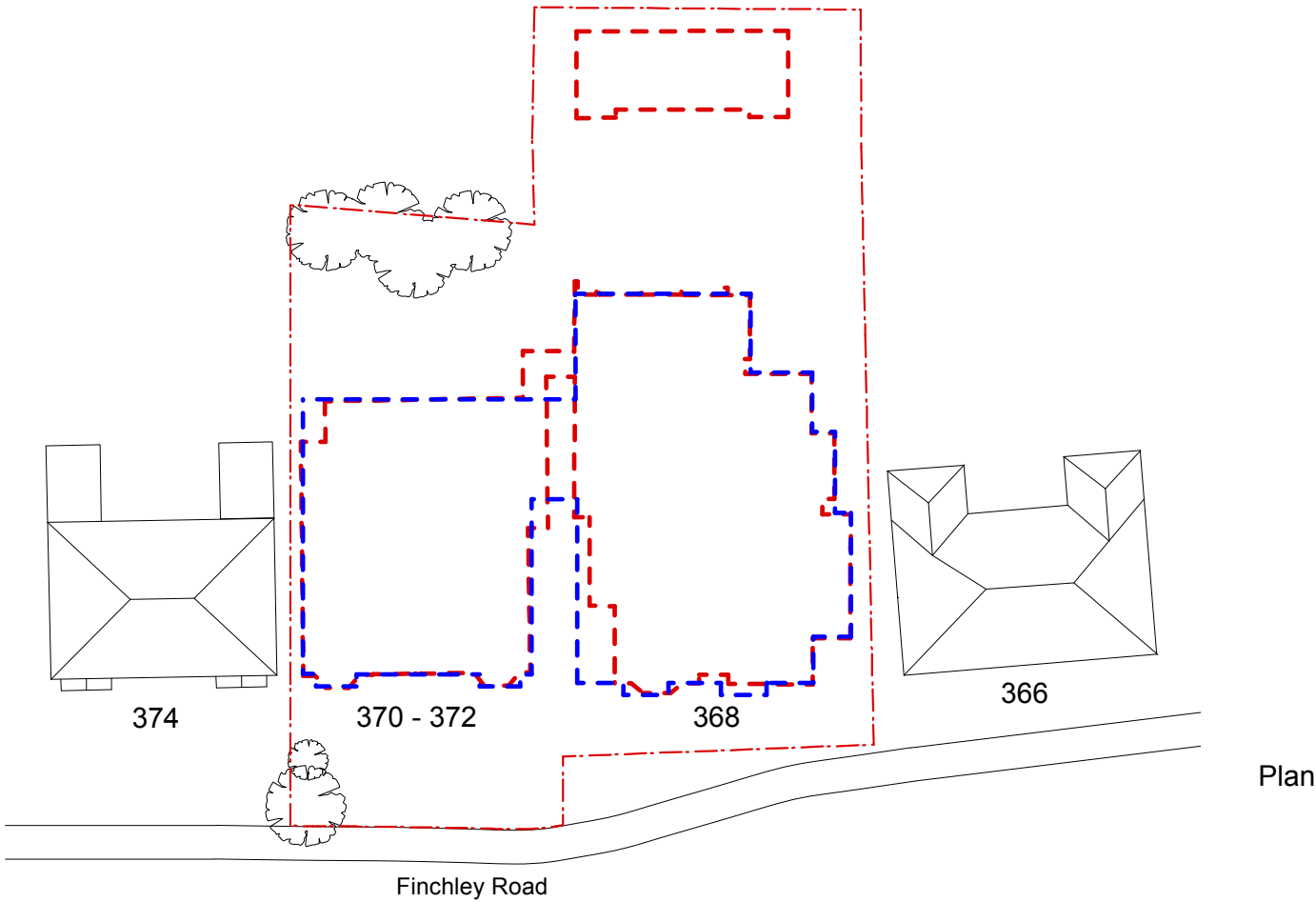
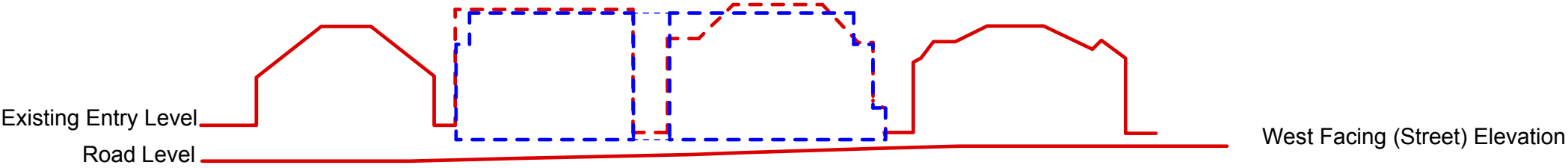
Proposed Building Footprint



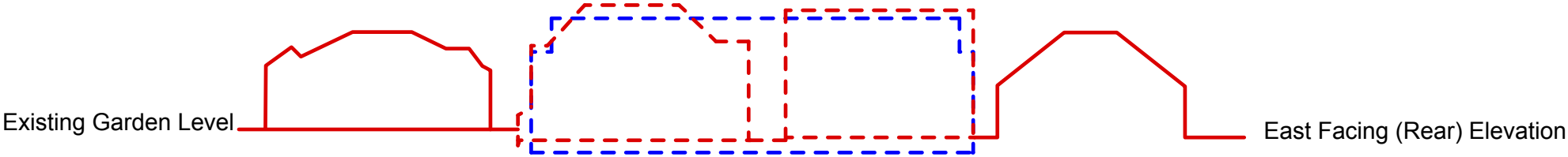
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5.2 Pre-Application Response  
Application Date: 16.06.11

Existing & Proposed Massing Diagrams



- Site Boundary
- - - Existing Building Outline (to be demolished)
- - - Proposed Building Outline





5.3 Pre-Application Response  
Application Date: 16.06.11

Street Elevations

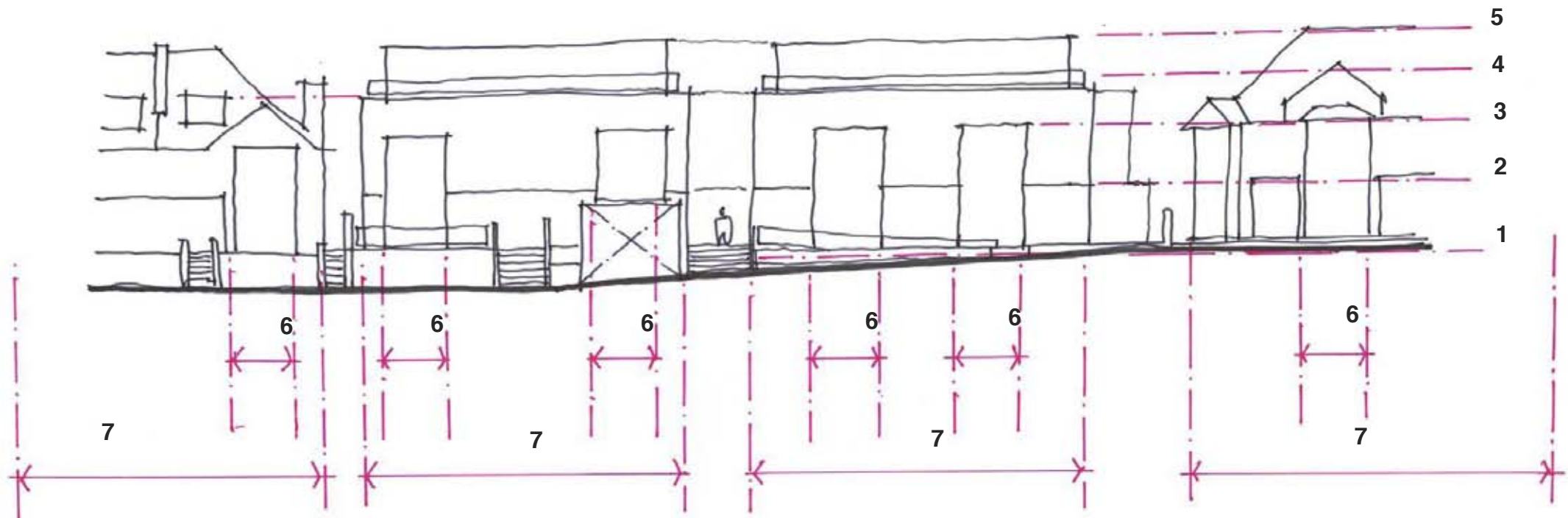
Since the Pre-Application feedback the professional team have undertaken further detailed analysis of the site and its constraints and prepared a design, which carefully addresses these.

We have responded to the comments with regards to prevalent ridge heights, building lines and site proportions. The design of the blocks now match the proportions of the plots along Finchley Road and the height of the blocks tie in with adjacent building lines matching the urban grain.

We have also picked up on the rhythm of the facades along Finchley Road the most predominant being a two storey projecting bay feature.

The buildings are set at the same height as the existing ground floor, which is consistent along this section of Finchley Road

- equalised the blocks to match the typical width of a block to plot
- matched our proportions to suit the prevalent eaves, ridge and dormer levels of adjacent properties
- picked up on the prevalence of two storey projecting bays.



1. Prevalent ground floor level along Finchley Rd
2. Projecting ground floor bays along Finchley Rd
3. Prevalent eaves height along Finchley Rd
4. Projecting projecting dormers along Finchley Rd
5. Prevalent ridge height along Finchley Rd
6. Typical width of two storey projecting bays along Finchley Rd
7. Typical building to plot width along Finchley Rd

6.0 Pre-Application Response  
Application Date: 08.09.11

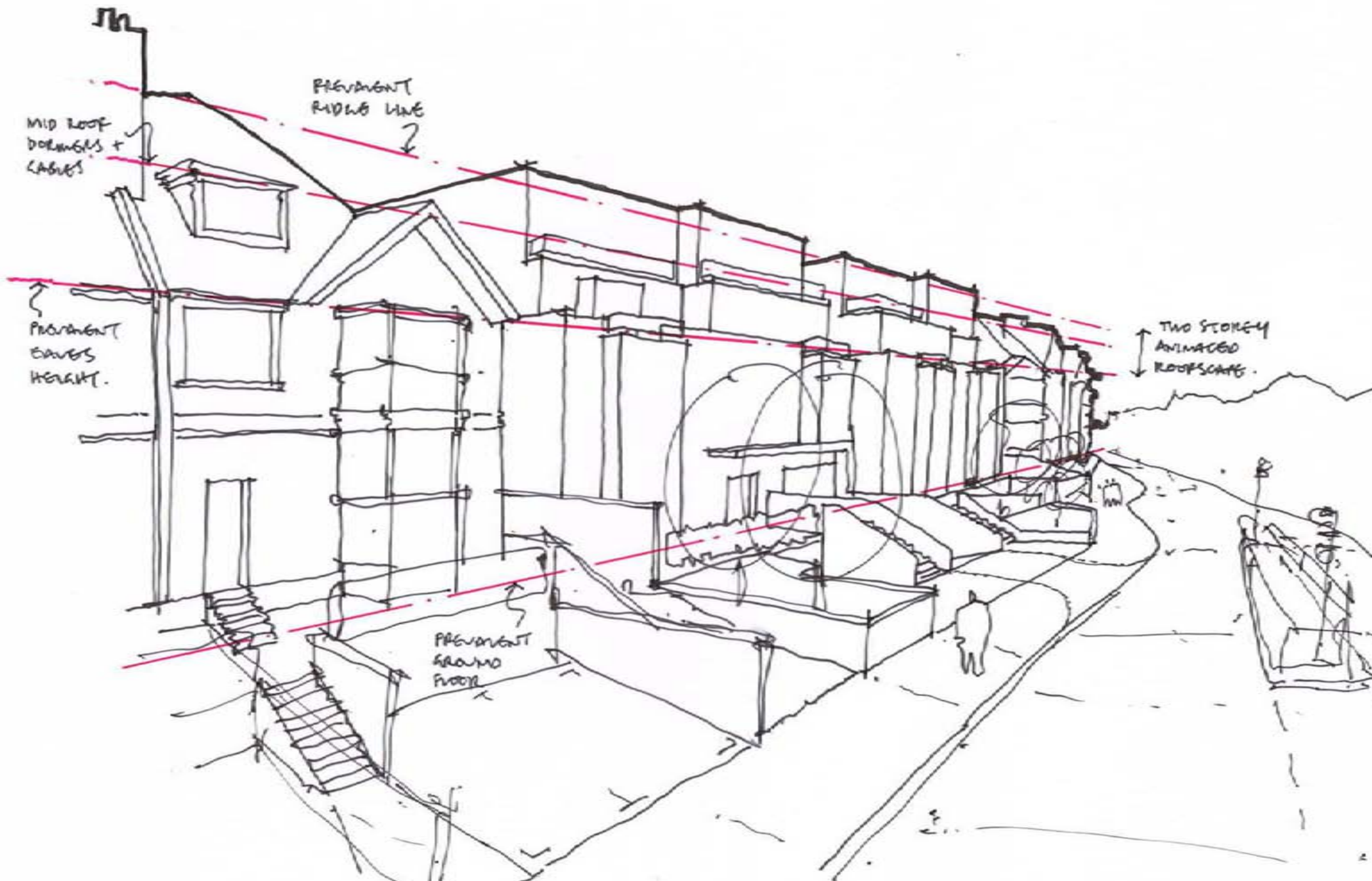
Amended Roofscape Design

On 8th September a further pre-application meeting was held at Camden Planning Department.

It was noted that the elevational treatment on Finchley Road elevations did not pick up strongly enough on the prevalent eaves line of the adjacent buildings with the brickwork extending above this line.

It was suggested that the 2nd and 3rd floors could become more animated/sculpted to reflect the roofscapes along Finchley Road, which are predominantly two storey with a variety of projecting elements such as dormers and gables. This would also align the brickwork to the adjacent eaves line.

The revised proposals terminate the brickwork at the eaves line with the change in material occurring above at 2nd and 3rd floors. There are also some steps introduced to the facades to give a more sculpted appearance and along with the introduction of projecting dormers responds to the adjacent context.



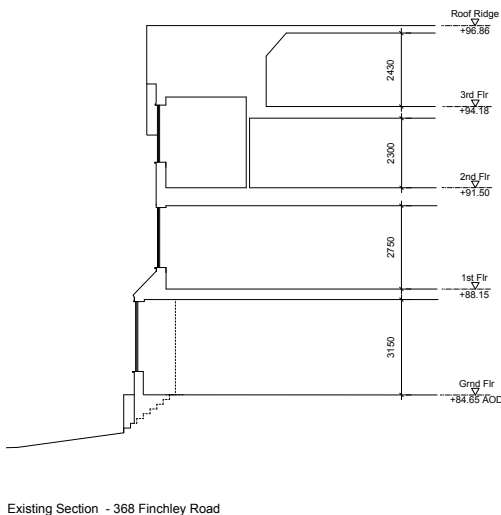
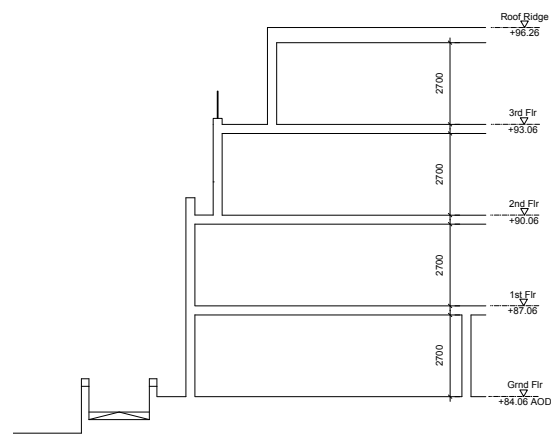
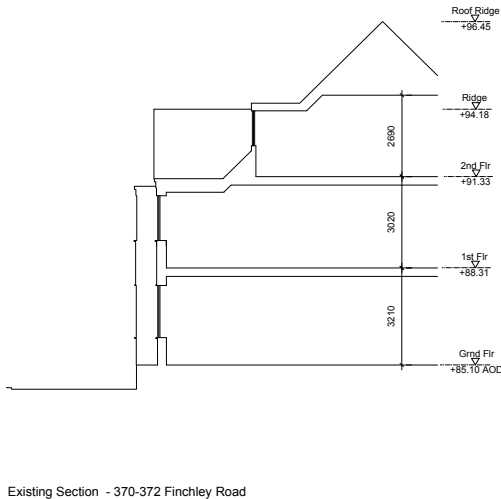
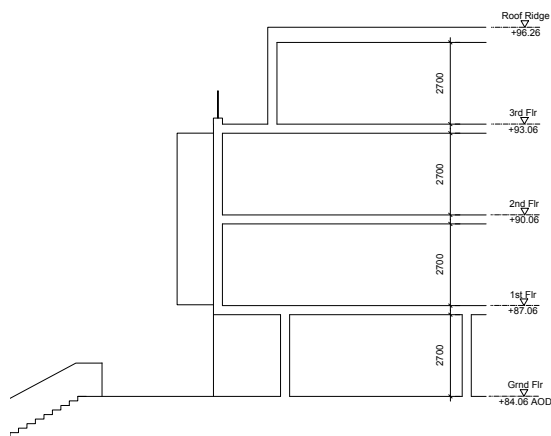
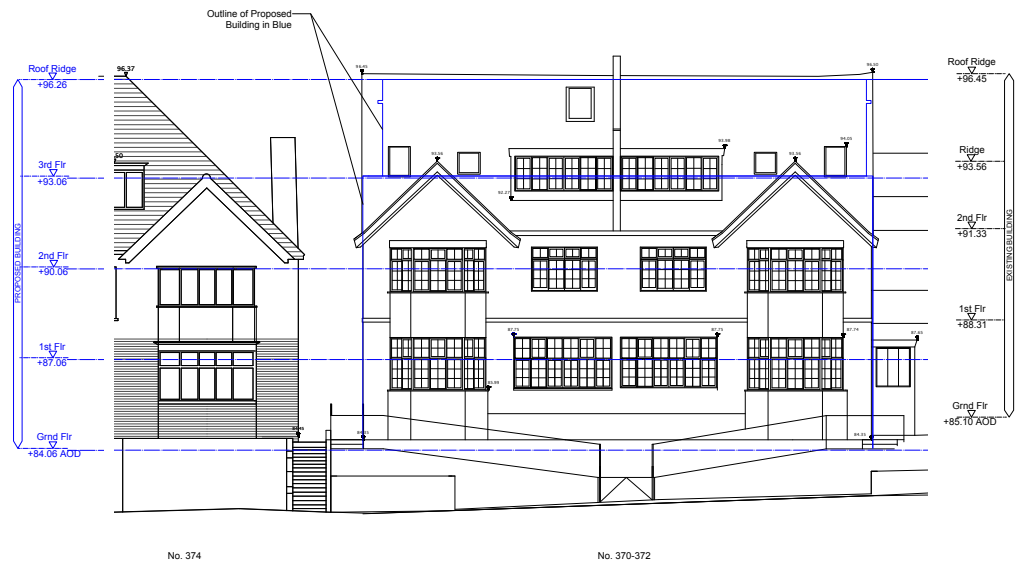


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6.1 Pre-Application Response  
Application Date: 08.09.11

Proposed Comparison with Survey  
Information

It was requested that we provide clear graphic drawings showing the relationship of the proposed 4 storeys against the survey elevations of the adjacent and existing to be demolished. These drawings demonstrate that 4 storeys can be comfortably accommodated within the heights of the adjacent buildings, not exceeding the ridge heights.



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6.2 Pre-Application Response  
Application Date: 08.09.11

Before & After Views of Link

It was noted that there was a preference for the two blocks to be more visually separated. The link between the two blocks is set back significantly from the main Finchley Road façade line however it was felt that the link could be at the higher levels only therefore allowing a view through to the gardens at the rear. This was explored however this could only be achieved at the ground floor level which allows the link to appear less solid and also offers views through to the gardens. The link would be fully glazed to further enhance this.



View through Link - Before



View through Link - After