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6.1 Background and Planning History

6.1.1 As set out above, the site was last used as part of Thames Water's operational facilities. The site provided flats and houses occupied by Thames Water employees, other operational buildings and 'hardstanding'. The site is no longer required for their operational purposes, and is unoccupied. It has been designated in both the UDP, and the emerging LDF for residential development.

6.1.2 The site has been subject to only one relevant planning application (Ref. 2009/0113/P). This proposed the demolition of the existing residential units (6 flats and 2 semi-detached houses) and redevelopment of the site to provide 22 residential units (three 3-bed, thirteen 4-bed, and two each of 5-bed, 6-bed and 7-bed) within two linked blocks; plus associated fitness and leisure facilities, car parking, cycle storage/parking servicing, refuse stores and plant & machinery.

6.1.3 The application was refused on 24th April 2009 for a variety of reasons, including the design and the lack of detail on the proposed affordable housing solution, though the principle of residential development in this location was considered acceptable by Officers.

6.1.4 The site was subsequently sold, and was purchased by Regent Park Estates (GP) Ltd. who appointed CIT Developments as their development managers. CIT appointed a new Architect, and professional team to provide a more sympathetic and carefully considered residential development proposal for the site.

6.2 Planning Policy and Background

6.2.1 This section of the report briefly considers the proposals in the context of adopted planning policy, and other relevant guidance. It summarises the principal considerations, but must be read in conjunction with the more detailed technical reports and specialist commentary included elsewhere within this document, and forming part of the application as a whole.

6.2.2 The starting point for the determination of this planning application is the Statutory Development Plan, as advocated by the Planning and Compulsory Purchase Act 2004 (PCPA). In respect of this site, this comprises the London Plan (as amended) (2008), and the Camden Local Development Framework comprising the Camden Core Strategy (2010) and the Camden Development Policies Development Plan Document.

6.2.3 National Guidance

There is a wide range of planning guidance published at a national level. The following Planning Policy Statements (PPS) are of relevance to the application proposals:

- PPS1: Sustainable Development (2005);
- PPS3: Housing (2005);
- PPG13: Transport; and,
- PPS5: Planning for the Historic Environment (2010).

6.2.4 Regional Guidance

The currently adopted London Plan is the consolidated with alterations version, adopted in February 2008. The Mayor released a Consultation Draft Replacement London Plan which was consulted on in October 2009. The examination of the London Plan closed in December 2010. The Panel report is due this year and only once published would it be reasonable to afford significant weight to its policies. The current London Plan policies are therefore generally referred to in the following analysis.

6.2.5 The overall strategy for the London Plan focuses on sustainable development seeking to optimise use of previously developed land (Policy 2A.1).

6.2.6 The GLA has also published a number of supporting documents that are relevant in the consideration of this application. Of particular relevance are:

- Central London Sub-Regional Development Framework;
- London Housing Design Guide – Interim Edition (August 2010);
- SPG: Housing;
- SPG: Interim Housing Supplementary Planning Guidance;
- SPG: Sustainable Design and Construction;
- SPG: Accessible London: Achieving an inclusive Environment;
- SPG: Integrating renewable energy into new developments: Toolkit for planners, developers and consultants; and,
- Draft SPG: Providing for children and Young People's play and informal recreation.

6.2.7 Local Guidance - Unitary Development Plan

Whilst the majority of the UDP has been replaced by the now adopted Camden Core Strategy and Development Policies DPD (see below), many of the UDP's Land Use Proposals Sites have been saved (until such time that the Site Allocations DPD supersedes them). 40-49 St Edmund's Terrace is a 'saved' identified development site for residential use in the UDP.

6.2.8 The key Supplementary Planning Document is Camden Planning Guidance 2006 (as amended 2009).

6.2.9 LB Camden also consulted on the first draft of an updated version of this document during December (2010) and January (2011) and will do so again during February and March 2011. The updated version will form part of the Local Development Framework (see below). As this document is in the early stages of consultation and is unlikely to have progressed significantly before this application is determined, little weight can be afforded to it.

6.2.10 Local Guidance - Local Development Framework

LB Camden is in the process of updating their planning policy documents through production of their Local Development Framework (LDF) in accordance with the requirements of the PCPA. The LDF will ultimately supersede the adopted UDP in its entirety and comprise a suite of Development Plan Documents (DPDs).

6.2.11 The first DPDs have now been adopted including the Camden Core Strategy and Development Policies DPD. Both were adopted on 8 November 2010.

6.2.12 The other key document in production is the Site Allocations DPD. This is currently at the Preferred Options stage and contains specific reference to the 40 - 49 St Edmund's Terrace site (Site No. 48).

6.2.13 Site 48: 40-49 St Edmunds Terrace, former car park and adjacent land to the south of Barrow Hill Reservoir is allocated for residential redevelopment. In the Draft Site Allocations DPD it is described as being capable of accommodating 'an additional 15 dwellings'.

6.2.14 The weight attached to emerging policy documents increases until adoption. Given the fairly advanced stage of the Site Allocations DPD reasonable weight can be given to it in the decision making process alongside policy within the statutory development plan.

6.2.15 Other Guidance

Other non-statutory guidance of relevance includes English Heritage's publications with regard to historic landscapes.

6.3 Land Use

6.3.1 It is generally not the function of the London Plan to identify specific land uses at a local level. However, there are strategic principles that the document establishes. The overall strategy of the Plan focuses on sustainable development, seeking the optimised use of previously developed land (Policy 2A.1). Furthermore, the London Plan seeks to increase the supply of housing (Policy 3A.1).

6.3.2 The UDP specifically identifies this site as one appropriate for residential redevelopment with open space (Site 36). This designation has been carried forward into the draft Site Allocations DPD (Site No. 48) which states:
'The 2006 UDP Inspector's recommendation for the site stated the site could provide for a high quality residential environment, well related to the adjoining Metropolitan Open Land and would require the provision of on-site open space.'

6.3.3 Residential use remains the priority land use in Camden, and a key objective of development plan policy is to maximise the supply of additional homes in the borough, making full use of Camden's capacity for housing. In particular, the maximum appropriate contribution to supply of housing is sought on sites that are underused or vacant - such as St Edmund's Terrace.

6.4 Density and Mix

Density

6.4.1 Policy DP2, "Making full use of Camden's capacity for housing", notes that the council will seek to maximise the supply of additional homes in the borough by "a) expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant..."

6.4.2 At para 2.9 of the Adopted Camden Development Policies document, it is noted that;
"High development densities are one way of making the maximum use of a site (in the context of housing, this means more homes or rooms in a given area). In accordance with policy CS1 of the Camden Core Strategy, the Council will expect the density of housing development to take account of the density matrix in the London Plan (Table 3A.2), and to be towards the higher end of the appropriate density range. However, the appropriate density will also depend on accessibility, the character and built form of the surroundings, and protecting the amenity of occupiers and neighbours. Given that the majority of the borough has relatively high public transport accessibility and is suitable for development of flats, densities should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare"

6.4.3 Table 3A.2 of the London Plan sets out residential density guidance. Given the site is in an 'urban' location (Policy 4B.1), with a PTAL within the 2 - 3 range, the guide density range is given as being 200 - 450 habitable rooms per hectare. Table 3.2 of the emerging London Plan provides a density matrix, which maintains the above targets. The site provides a density of 388 habitable rooms per hectare. (This equates to 92.5 units per hectare). The density was originally higher, but has been reduced during the pre-application discussions with Officers, neighbours and amenity groups to allow account to be taken of feedback received on the setting of the site and the character of the wider area, and local views, etc (See comments on design below).

6.4.4 The London Plan Supplementary Planning Guidance on Housing (November 2005), whilst remaining part of the Statutory Development Plan, has in part been superseded by the Interim Housing SPG (2010). The document's Affordable Housing section has been superseded entirely by the Interim document.

6.4.5 The London Plan Interim Housing SPG (2010) is intended to clarify points, among others, on the relationship between housing density and quality (and affordable housing targets) ahead of the emerging

<p>Replacement London Plan's adoption during 2011. With regard to density, the interim policy document states, that Boroughs should seek to, '...ensure that development proposals achieve the maximum intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity.'</p>	<p>6.4.10 Unit Sizes and 'Lifetime Homes'</p> <ul style="list-style-type: none"> - All the units provided are fully compliant with 'lifetime homes' standards. - 10% will be constructed to wheelchair access standards in accordance with SPG. (these are identified on the plans by means of a 'wheelchair' symbol). - All units are fully compliant with SPG space standard requirements. 	<p>6.4.15 At paragraph 4.46 it notes that boroughs should consider the economic viability of the preferred outcome, the potential of the value of the site to contribute to funding the cost of affordable housing provision, and the availability of public subsidy to support affordable housing on the development. The guidance notes that the GLA, with the support of the Housing Corporation, has developed a 'tool kit' to assist both boroughs and applicants in assessing the extent to which site value can support a range of affordable housing options.</p>
<p>6.4.6 LDF Core Strategy Policy CS6 encourages the full use of Camden's capacity for housing by regarding housing as the priority land use of Camden's Local Development Framework. CS6 and Development Policies DPD Policy DP5 seek to ensure the amount and range of sizes and types of dwellings provided address identified local need. The Core Strategy states, 'For the first five years of the trajectory, the target for additional self-contained homes can be met from an identified supply of deliverable land in the form of allocated sites, emerging sites and other sites where planning permission has already been granted.'</p>	<p>6.4.11 Affordable Housing</p> <p>The London plan indicates at policy 3A.9 that boroughs should set an overall target is the amount of affordable housing provision in their area based on an assessment of all housing needs and a realistic assessment of supply. In setting targets, boroughs should take account of regional and local assessments of need.</p>	<p>6.4.16 Further, the interim policy states that Boroughs should consider, 'off-site provision where an alternative site or sites have been identified which would enable affordable housing provision more appropriate to the identified needs to be met and where the project is deliverable prior to the on site market development being completed. Exceptions may be allowed in order to create the establishment of an "affordable housing pot" – where resources can be pooled to enable a more significant affordable housing development to take place off-site – in compliance with ODPM Circular 5/05.'</p>
<p>6.4.7 The proposals are thus in line with both the London Plan and Camden LDF Density Matrices. The proposals comply with policy, producing a scheme that optimises the development potential of the site, but does so in a way which is respectful of its Primrose Hill setting, and the built form of the surrounding area.</p>	<p>6.4.12 Policy 3A.10 notes that boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed use schemes, having regard to their affordable housing targets as set out above, and the need to encourage, rather than restrain residential development, and the individual circumstances of the site. The policy notes that targets should be applied flexibly taking account of:</p>	<p>6.4.17 The LDF Core Strategy and Development Policies document also contain a number of policies that relate to the provision of affordable housing. In particular, Policy CS6 and DP3, state (respectively) that, '[Camden will pursue the provision of high quality affordable housing by] seeking to negotiate a contribution from specific proposals on the basis of: – the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development.' and, 'The Council will expect the affordable housing contribution to be made on site, but where it cannot practically be achieved on site, the Council may accept off-site affordable housing, or exceptionally a payment-in-lieu.'</p>
<p>Mix</p>	<ul style="list-style-type: none"> • The individual site costs; • The availability of public subsidy, and; • Other scheme requirements. 	<p>Quantum</p>
<p>6.4.8 Policy DP5 and associated Dwelling Size Priority Table (para 5.4) provide guidance as to the type of housing that is identified as a priority to provide within the borough. The policy acknowledges that demand exists for all sizes of dwellings, but seeks to ensure that developments' housing mix should reflect these priorities. It also recognises that site-specific factors may mean that in some instances, it will be appropriate to provide some variation. Such site-specific issues include development, site and area character, site size, and the economics and the financial viability of the site, including the demand for homes of different sizes.</p>	<p>6.4.13 The London Plan also goes on to note in paragraph 3.57, '...a borough may consider that the required affordable housing should be provided off-site, or that a financial contribution instead of on-site provision, is acceptable. Examples where off-site provision could be appropriate include... [situations where there are] demonstrable benefits to be gained by providing the new units in a different location... to provide more units than is possible on the principal site.'</p>	<p>6.4.18 The amount of affordable housing provided as a result of the scheme has been determined through carrying out a detailed 'toolkit' appraisal, and this appraisal and supporting information have been separately submitted.</p>
<p>6.4.9 The proposals' mix is set out in the attached Accommodation Schedule, but comprises approximately 16% 1-bed units 25% 2-bed units (flats and house), 27% 3 bed units, and 32% four bed units. Given the site's proximity to Primrose Hill, and the character of the surrounding area, the inclusion of 'family-sized' units was felt to be appropriate, and the overall mix of dwelling types seeks to take account of both the dwelling size priorities set out in the policy, and provide a mix of larger and smaller homes.</p>	<p>6.4.14 The Affordable Housing section of the London Plan's SPG on Housing (2005) has been superseded entirely by the Interim Housing SPG (2010). This document is in part intended to clarify affordable housing targets ahead of the emerging Replacement London Plan's adoption during 2011.</p>	<p>Off-site provision</p> <p>6.4.19 The sale of the private dwellings in the scheme provides the funding for provision of the affordable housing. In this case, a number of factors have led to the need for the off-site provision of affordable housing. A particularly significant impact on the overall viability</p>

of the scheme is the impact in terms of cost and risk from the very significant subterranean Thames Water infrastructure, and the time and expense involved in relocating elements, and working around other existing below-ground infrastructure which cannot be moved. (See 'constraints' digram at [insert page no]).

6.4.20 The reductions in the area of accommodation proposed on the site, made as a consequence of discussions with local amenity societies, residents and through discussion with Planning Officers also impacts on the scheme's ability to support on-site affordable units.

6.4.21 The mechanism for the delivery of the affordable housing would be via a legal agreement ("section 106 agreement"). The exact terms of this agreement will be concluded once LB Camden have completed their own independent appraisal of the financial viability of the proposals. A number of possible locations for the affordable housing are currently under consideration.

6.5 Design and Conservation

6.5.1 Section 3 of this report explained in detail, the design concepts underlying the scheme. Montagu Evans have also prepared a separate Townscape Assessment analysing the proposals in the context of the adjacent Primrose Hill, (which is on the non-statutory register of Parks and Gardens, Grade II) and surrounding conservation areas and listed buildings and with specific reference to the guidance contained within PPS5, Draft Royal Parks Guidance and English Heritage's non-statutory guidance with regard to the assessment of conservation areas. This includes a detailed assessment of character and views, and a further appraisal of the scheme in this context.

6.5.2 The purpose of this section is to set out how this design rationale responds to relevant planning policy, and guidance, and the comments below should be read in conjunction with the commentary set out in the Townscape Assessment.

6.5.3 With regard to design and conservation, London Plan policies (4B.1, 4B.3 & 4B.6) seek to ensure that the development potential of sites are maximised combined with achieving a high quality of design. Developments should be:

- accessible for all;
- sustainable;
- durable;
- adaptable;
- enhance the public realm; and,
- respect local context and character, communities and the natural environment.

6.5.4 Camden's LDF Core Strategy and Development Policies DPD further illuminate the policy context established by the London Plan. It requires development within the Borough to be of the highest standard and to take into consideration the scale, height, bulk, materials and character of surrounding buildings as well as natural features, heritage assets and open spaces (Policies CS14, CS15, DP24 and DP25).

6.5.5 New development should reflect elements of the local vernacular that make it distinctive and of a particular character. Prevailing scales, forms, proportions and materials should be incorporated into designs. Visual interest should be provided, particularly at ground level to contribute to a sense of vitality and assist in making Camden a safer place (Core Strategy Policy CS17).

6.5.6 Section 3.5 provides a detailed explanation of the proposed scheme's design evolution. In this section the site's built context is shown to have been instrumental in the design process, informing site layout, urban grain, overall scale, bulk and mass as well as façade treatments, openings, styles and proportions.

6.5.7 Policy CS14 – Promoting high quality places and conserving our heritage and Policy CS15 – Protecting and improving our parks and open spaces and encouraging biodiversity, are of particular relevance to the proposals' impact on Primrose Hill. To properly assess the visual impact, careful consideration has been given to both local and strategic views (established in consultation with LB Camden Officers).

6.5.8 As a part of the preparation for the application, 16 locations have been agreed with planning officers, from which views have been modelled, to assist in understanding the impact of the proposals on the existing environment. The appropriate design solution was felt to be to create three blocks, the lowest of which to be set closest to Primrose Hill. Further consideration of the scheme's impact on amenity is discussed in the Impact on Neighbour Amenity section later in this statement.

6.5.9 The scheme respects the scale, height, bulk, materials and character of surrounding buildings. The analysis in this document shows how natural features, heritage assets and the open spaces of Primrose Hill and Regents Park have all been carefully considered and respected. Consequently, the design is able to sit comfortably in its context, preserving the amenity of neighbours and users of Primrose Hill, and providing the high quality design and materials sought by the Borough.

6.6 Trees, Landscaping and Ecology and Biodiversity

6.6.1 London Plan policy 3D.15 - Trees and Woodland, states that the Mayor will and boroughs should protect, maintain and enhance trees and woodland. Policy 4A.3 states developments should conserve and enhance the natural environment, particularly in relation to biodiversity, and should incorporate living roofs and walls where feasible (also see Policy 4A.11). Policy 4B.1 concerning Design Principles for a Compact City also state that developments should seek to ensure that the public realm is enhanced and the natural environment is protected.

6.6.2 The LDF is more specific regarding these issues and comprises Policies CS15, DP24 in relation to trees. The policy content encourages development to consider existing natural features (including trees) and states:
'Development will not be permitted which fails to preserve or is likely to damage trees on a site which make a significant contribution to the character and amenity of an area.'

Trees within the Site Boundary

6.6.3 The scheme proposes to retain the majority of existing trees within the site. The level of amenity contributed by the majority of existing trees on site is in many cases low due to their size, quality and relative lack of prominence in the streetscene (see Arboricultural Report), However, where possible and appropriate these are retained, and supplemented by further planting.

6.6.4 The trees to be removed are labelled T26 and T27 in the attached Tree Survey.

6.6.5 The Arboricultural Report also demonstrates that the proposals will avoid any disruption or damage to tree roots on site. Building footprints will not encroach within the Root Protection Zones (RPZ) as defined in the relevant British Standard. Where hardstanding is proposed within RPZs, construction methods will be adopted that prevent damage to tree roots and ensure the overall health and well-being of the trees.

Adjacent Trees, within Primrose Hill Park

6.6.6 A line of trees is set within Primrose Hill Park, adjacent to the site's eastern boundary. As the Arboricultural Survey shows, a large proportion of these trees' root systems are likely to have encroached onto the site.

6.6.7 An existing Thames Water access road runs north/south across the RPZs described above. The proposals necessitate the alteration of ground levels along this eastern margin which in turn requires the relaying of this road. David Partridge Associates oversaw investigatory work carried out to assess the depth of the 'made up ground' below the existing road surface i.e. the depth to which no tree roots are present due to the existing road structure. The road will be re-provided within this depth so as to prevent root damage occurring. The existing access road consists of an impermeable tarmac surface. The opportunity is being taken to introduce a permeable surface, which will allow both water and gasses to percolate to and from the roots. Consequently, the overall effect of this change is likely to be to create a healthier environment for these Park trees.

6.6.8 The new buildings on the site are set back from the park edge, behind the access road mentioned above. As a consequence of this setback, and the orientation of the site, the existing Park trees will not be detrimentally affected by the presence of the new buildings.

6.6.9 The new buildings have an underground car park. Again, the boundary of the car park below ground is pulled back from the edge of the park. Because the land beneath the site is largely London clay which is relatively impermeable, the presence of the new basement will not have any significant effects on groundwater movement. This means that the introduction of the basement will not have any detrimental effect on the long term health of the trees.

6.6.10 As a part of the pre-application process, meetings have taken place with both the Royal Parks, and their Arboricultural specialists, and with LB Camden Arboricultural officers to ensure that the proposals meet with their requirements with regard to trees

Landscaping

6.6.11 The scheme's landscaping proposals are set out in detail in section 8.15 and in a separate report, appended. ScapeDA, the landscape architects in conjunction with URS ecology team have prepared proposals and these have been reviewed with LB Camden's officers to ensure that the choice of species and planting are appropriate, and provide appropriate habitat and biodiversity.

6.6.12 The landscaping scheme will also provide visual amenity to residents of the scheme, and neighbours.

Biodiversity

6.6.13 Policy 3D.14 makes clear the GLA's intention to ensure that the protection, promotion and management of biodiversity is integral to any successful development. Central to this is the proper consideration of wildlife habitat and in particular habitat of protected species (e.g. bats).

6.6.14 LDF Core Strategy policy CS15 - Protecting and improving our parks and open spaces and encouraging biodiversity makes clear Camden's requirements for the protection and enhancement of biodiversity within development schemes. This position is illuminated further by Development Policies DPD policy DP24 - Securing high quality design, which requires the consideration existing natural features, such as topography and trees and the provision of appropriate hard and soft landscaping including boundary treatments. Supporting text explains that biodiversity enhancement is included in these factors.

6.6.15 The application includes an Ecology Report, written by URS, that provides a detailed analysis of the current ecological value of the site (Phase 1 Habitat Survey). It examines the impact the proposals will have on this and the measures that are proposed to ensure a net enhancement of biodiversity is achieved. This is of particular importance given site's proximity to Primrose Hill.

6.6.16 The landscaping scheme will include only native species that are known to support a wide variety of native fauna. To compliment this, bat boxes and bricks will be incorporated into the landscape scheme and building design. In addition, the new 'green roofs' would incorporate 'acid grass' planting, providing further habitat to compliment the unusual acid grasslands found on Primrose Hill itself. The presence of bats was determined via a bat survey, conducted by URS in 2010. Please refer to this survey (in conjunction with the Ecological Report) for further details of the bat presence and the exact nature of the mitigation measures proposed as part of the scheme.

6.6.17 For these reasons it is considered that the proposals meet with the requirements set out on both regional and local planning policy with regard to both landscaping and biodiversity.

6.7 Amenity/Open Space

- 6.7.1 The London Plan makes no specific reference to the provision of private or communal amenity space. Nevertheless, the provision of amenity space is integral to good design and therefore policy 4B.1 has been considered. More recently, the GLA have adopted a supplementary planning guidance note with regard to providing play and informal recreation space for children and young people (March 2008).
- 6.7.2 Policies within the LDF (Policies CS14 & DP24) require the provision of appropriate outdoor amenity space within new development. A total of 1,000 sq m approximately of private amenity space is provided in the form of communal gardens and private terraces (comprising of hard and soft landscaping), in front, beside and between the three residential blocks.
- 6.7.3 In light of the site's close proximity to the considerable public amenity space offered by Primrose Hill, and the on site, private amenity space afforded by communal, landscaped gardens we believe that the proposals offer a high-quality environment with appropriate amenity space provision – in accordance with policy and guidance.

6.8 Impact on Amenity for Neighbours

- 6.8.1 The London Plan makes no specific reference in relation to impact on amenity. However, the protection of existing amenity is integral to good design and therefore policy 4B.1 has been considered. The London Plan does specifically refer to reducing noise (Policy 4A.14).
- 6.8.2 The LDF makes specific reference to impact on amenity (Policies CS1, CS5 & DP26). These references are built upon in the Camden Planning Guidance note (most recently in draft consultation form, November 2010). The Core Strategy policies seek to manage the impact of growth and development generally. CS5 in particular ensures that resident amenity is considered in development design, requiring mitigating measures where necessary as well as ensuring that development in all other respects does not unduly impact on its context and neighbours.
- 6.8.3 Policy DP26 requires that a development's impact in terms of resident visual privacy, overlooking, overshadowing, outlook, access to daylight and sunlight and disturbance from artificial light is considered. The LDF also considers the implications of noise (Policy DP28). It states that proposals that exceed Camden's noise threshold or would cause noise pollution in any case will not be permitted.
- 6.8.4 To fully understand any potential concerns in this regard from neighbours and other nearby residents, a programme of public consultation has been undertaken. Details of this set out in a separate Statement of Community Involvement. This included public exhibitions, meetings with potentially affected residents, and meetings with key amenity groups. The scheme has been specifically evolved and amended directly as a consequence of the comments and observations received from the neighbours.
- 6.8.5 Consequently impact on amenity has been given careful and thorough consideration from the very earliest stages of design development. We set out in more detail thoughts and responses with regard to visual privacy, overlooking, overshadowing, outlook, access to daylight and sunlight and disturbance from artificial light below.

6.9 Visual Privacy and Overlooking

- For neighbours
- 6.9.1 Currently, the site is (by central London standards) very open. As a result, any development that seeks to increase the density of development here will almost inevitably have an effect on neighbours. There are dwellings to the west and south of the site, however those to the west are separated from the site by a Thames Water site (containing plant associated with Barrow Hill Reservoir). Those to the south are potentially the most directly affected by the development in this regard, however they too are separated from the site by St Edmunds Terrace as well as a wide landscaped margin on the southern boundary of the site, containing trees, and the driveway, with the new buildings set approximately .
- 6.9.2 When considering impact on overlooking, it is useful to examine the historical pattern of development in the area and the relationships between properties that have resulted. In many instances buildings (of a similar height to those proposed) are set forward in their plots, abutting the back edge of pavement. The proposed buildings will provide a far greater degree of separation between themselves and both the dwellings to the west (40m) and south (25-30m).
- For the development
- 6.9.3 The scheme has been designed to minimise the potential for overlooking between units, whilst achieving an appropriate form of development on the site. This has principally been achieved through:
- Placing the majority of primary living rooms on the corners of the blocks, allowing them in many cases to have a dual aspect.
 - The bathroom and bedroom windows are concentrated in the areas facing into the courtyard spaces between the blocks, or looking outwards along the central part of the blocks between the corners.
 - The majority of windows are not overlooked because they face the park, the adjacent reservoir, or the open area to the rear of the development.
 - Those facing St Edmunds Terrace are a significant distance from the existing developments across the street, and constantly enjoy good levels of privacy.
 - Of the remaining windows looking into the courtyards, the bathroom windows are all obscure glazed.
 - Where possible the windows to bedrooms are offset so as not to directly look into one another. In the limited number of instances where there could be the potential for direct overlooking, a frosted glass screen is proposed, in order to allow sunlight and daylight to enter, whilst providing privacy.

- By using bay windows, and frosting the central element, it is possible to preserve privacy whilst still taking advantage of the good views and light that their East-West orientation provides.

6.9.3 Consequently we believe that the scheme will not result in any significant overlooking issues.

6.10 Overshadowing

On neighbours

6.10.1 The scheme comprises three blocks as previously described. Breaking the volume of space down into this series of blocks assists with light penetration. Additionally, the 'setbacks' from the edges of the site, and the relative heights of the blocks mean that there should be no significant impact on adjoining neighbours.

To Primrose Hill

6.10.2 Because Primrose Hill is to the East, for the majority of the day the shadows fall away from the park. Given that the block closest to the park is set back from the boundary, and is the lowest of the three any impact from shadowing is necessarily transitory and negligible.

Within the development

6.10.3 The north-south block orientation, open at the Southern end, means that the scheme gets the benefit of good sunlight as the sun tracks through the sky. In particular, the courtyards between the buildings will receive high levels of direct sunlight, making these pleasant and attractive spaces.

6.11 Outlook

For Neighbours

6.11.1 Because the site has been laid out largely as hard standing for operational use in the past, any substantial new development will inevitably change the views that some neighbouring occupiers have. Flats facing the site across St Edmunds Terrace currently enjoy an unusually open outlook for such a central location. Currently this view is of a redundant Thames water facility, however.

6.11.2 The new development is set substantially back from the edge of the site. It has been thoughtfully designed, and provides a high quality architectural approach. The landscape treatment to the St Edmunds frontage has also been carefully considered, and the proposals are designed to provide an attractive outlook. Consequently, whilst the view will change, we consider that the proposals provide an attractive outlook for residents with the architecture, landscape and a better boundary treatments combining to improve the current situation.

From within the development

6.11.3 Many of the flats enjoy very attractive views, and as set out above, the layouts have been carefully considered in order to maximise the opportunities to take advantage of the site's location and outlook. Placing living rooms on the corners of the blocks allows many to have a dual aspect. High quality landscaping within the site also contributes to the quality of outlook both for those living in the building and neighbours facing the site.

6.12 Sunlight and Daylight Study

6.12.1 Gordon Ingram Associates have undertaken an analysis of the proposals in accordance with the Building Research Establishment guidelines on sunlight and daylight. Their full report is included with the application.

For Neighbours

6.12.2 As outlined above, because of the way the buildings are pulled back from the edges of the site, and the careful massing of the built form on the site, in combination with the distances from neighbouring buildings, there are no significant impacts whatsoever on sunlight and daylight for surrounding occupiers

Within the development

6.12.3 All living rooms achieve compliance with ADF requirements. There are three flats where one bedroom is below the normally required ADF levels, but in two cases, this affects only the second bedroom, and in the case of the third, a one bedroom flat, the living room enjoys a double aspect and receives adequate light. Consequently, GIA consider that all the units have an acceptable level of daylight, with many having very good levels.

6.13 Disturbance from Artificial Lighting

- 6.13.1 The London Plan does not specifically mention the impact of artificial light however, as above, the management of light produced on site is considered to be part of good design and therefore policy 4B.1 has been considered. LDF policy DP26 (as mentioned above) requires that artificial light levels are included in the assessment of a development's impact on neighbour amenity. In addition, this is an issue which we have discussed with both the Royal Parks, the CAAC and with the council's Officers.
- 6.13.2 External lighting is included as part of the landscaped areas between the blocks and at points around paths and access roads. External light sources have been specifically designed to prevent light spillage – this is achieved through choice and design of luminaire, and location - low level lighting and the strategic placement of soft landscaping assists in achieving this.
- 6.13.3 The potential for light spillage from internal sources into the adjacent Royal Park was raised as a concern by Camden Officers and the CAAC. The initial proposed were redesigned to reduce the level of glazing on the upper floors of the blocks to address this concern.
- 6.13.4 Additional, detailed information and consideration of the impacts of the proposed lighting can be found in the Landscaping Report. A detailed consideration of the lighting's effect on wildlife and biodiversity can be found in the Ecology Report.
- 6.13.5 This analysis concludes that there will be a negligible impact on the amenity of residents and on the local wildlife and biodiversity generally.

6.14 Noise and Disturbance

- 6.14.1 London Plan Policy 4A.20 relates to noise. It seeks to ensure that boroughs reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals. Local policies CS5, DP26 and DP28 all deal with the production, reduction and prevention of noise and adverse impacts on amenity. There is potential for noise to manifest itself in during construction and once the development is occupied. These are discussed below and should be read in conjunction with the attached Acoustic Report written by Sandy Brown Associates, and the Construction Management Plan.
- During Construction
- 6.14.2 The Construction Management Plan sets out the key measures to be put in place to reduce any potential for disruption from noise during construction. This document sets out in detail the measures to be put in place to address noise and disturbance during the construction phase. In summary, these include measures such as;
- restricting noisy work to agreed set hours
 - using noise attenuated equipment where possible
 - Hoarding the site
 - carefully managing the arrival and departure of all vehicles
 - providing wheel washing and cleaning facilities for vehicles arriving and leaving
 - providing facilities for site operatives in order to minimise their need to leave site during the working day
 - providing 24 hour contact numbers for local residents in case of any problems
 - liaising with other nearby developments to coordinate activity (eg Guinness)
 - setting up a residents liaison group
 - issuing regular newsletters.
- 6.14.3 Any contractor will be required to be a member of the considerate constructors scheme.

When completed

- 6.14.4 A noise study has been undertaken in order to establish current background noise levels. Almost all the plant and equipment serving the new building is within the basement, with a further small amount accommodated within plant areas set inside a 'well' in the roof. This means that the potential for noise outbreak is low, and consequently we have been able to confirm that this plant can be introduced without any noticeable impact on noise levels.
- 6.14.5 Because of the relatively low number of flats within the proposals, and the fact that the building entrances and car park entrance are some distance from the edge of the site, potential to disturbance from those arriving at or leaving the site are likely to be negligible.
- 6.14.6 An air quality report is included with the application. This shows no significant or projected air quality issues arising from the proposals. The issue of dust and air quality during construction is also addressed in the Construction Management Plan.

6.15 Highways and Parking

- 6.15.1 A separate Transport Statement by TTP Consultants addresses the issues surrounding highways and parking. As a part of the preparation of this application, discussions have taken place with the highways department at the London Borough of Camden, who in turn have liaised with Westminster (adjoining Borough) in order to ensure that the proposed development can be appropriately accessed and serviced. On-site underground car parking in accordance with LBC standards is proposed.
- 6.15.2 London Plan policy 2A.2 sets out the overarching spatial approaches to a number of planning issues in London. LDF Core Strategy policy CS11 describes the need to promote sustainable travel.
- 6.15.3 One of the issues raised by residents during consultation process was concern over the potential for any additional vehicle movements to and from the site to exacerbate perceived congestion on St Edmunds Terrace and Ormonde Terrace. This matter has been carefully considered. The accompanying Transport Assessment sets out the results of traffic surveys conducted on these roads, as well as the anticipated level of 'trip generation' from the proposals. Using accepted standards and methodologies the statement concludes that the level of traffic created by the development (in addition to existing levels) would be well within the roads' capacities and would not result in congestion.
- 6.15.4 The highway impacts of the scheme are shown to be minimal and its parking provision to be compliant with explicit standards. It is considered therefore that the scheme is policy compliant in these regards.
- 6.15.5 Nevertheless, were the council to consider it appropriate, CIT have confirmed that they would be willing to agree to undertake further monitoring once the development is complete, and were this to show that the development had caused a direct increase in congestion, put forward an agreed contribution towards measures to ameliorate this.

6.16 Sustainability Policies

- 6.16.1 This section outlines the relevant sustainability policies, a more detailed analysis of the sustainability of the scheme is provided in separate 'sustainability' and 'renewable energy' reports by Long and Partners, included with this application The London Plan and Mayor's SPG: Sustainable Design and Construction set the regional policy context in relation to sustainability.
- 6.16.2 All policies in the London Plan promote sustainable development. Policy 2A.1 establishes a number of sustainable criteria as detailed below, these also form the framework for the SRDFs:
- optimising the use of previously developed land and vacant or underused buildings;
 - using a design-led approach to optimise the potential of sites;
 - ensuring that development occurs in locations that are currently, or are planned to be, accessible by public transport, walking and cycling;
 - ensuring that development occurs in locations that are accessible to town centres, employment, housing, shops and services;
 - ensuring that development takes account of the capacity of existing or planned infrastructure including public transport, utilities and community infrastructure, such as schools and hospitals;
 - taking account of the physical constraints on the development of land, including, for example, flood risk, ensuring that no significant harmful impacts occur, or that such impacts are acceptably mitigated;
 - taking account of the impact that development will have on London's natural resources, environmental and cultural assets and the health of local people;
 - taking account of the objectives of preventing major accidents and limiting their consequences;
 - taking account of the suitability of sites for mixed use development and the contribution that development might make to strengthening local communities.
- 6.16.3 Policy 4B.1 states that the Mayor and boroughs should seek to ensure developments are sustainable, durable and adaptable.
- 6.16.4 Policy 4B.6 establishes the context of the SPG: Sustainable Design and Construction. It states:
The Mayor will, and boroughs should, ensure future developments meet the highest standards of sustainable design and construction and reflect this principle in UDP policies.

These will include measures to:

- re-use land and buildings;
 - conserve energy, materials, water and other resources;
 - ensure designs make the most of natural systems both within and around the building;
 - reduce the impacts of noise, pollution, flooding and micro-climatic effects;
 - ensure developments are comfortable and secure for users;
 - conserve and enhance the natural environment, particularly in relation to biodiversity;
 - promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes, CHP schemes and other treatment options (subject to Policy 4A.1 and 4A.2);
 - Applications for strategic developments should include a statement showing how sustainability principles will be met in terms of demolition, construction and long-term management;
 - Boroughs should ensure that, where appropriate, the same sustainability principles are used to assess planning applications.
- 6.16.5 Policy 4A.7 advises of the Mayor's Energy Strategy and how boroughs should support it, of particular relevance are the following points:
- requiring the inclusion of energy efficient and renewable energy technology and design, including passive solar design, natural ventilation, borehole cooling, combined heat and power, community heating, photovoltaics, solar water heating, wind, fuel cells, biomass fuelled electricity and heat generating plant in new developments wherever feasible;
 - facilitating and encouraging the use of all forms of renewable energy where appropriate including giving consideration to the impact of new development on existing renewable energy schemes.
- 6.16.6 The London Borough of Camden's LDF Core Strategy reflects the London Plan's sustainability aspirations. Policy CS13 – Tackling climate change through promoting higher environmental standards, sets out LBC's approach to:
- Reducing the effects of and adapting to climate change;
 - Local energy generation;
 - Water and surface water flooding; and,
 - Carbon reduction measures.

6.16.7 These matters are discussed in more detail in the Sustainability Assessment and Energy Strategy by Long and Partners. The assessment sets out the various passive and active measures that the scheme's design incorporates to ensure the best levels of energy performance and overall sustainability can be obtained. The scheme will achieve Code for Sustainable Homes Level 4, in accordance with LBC guidance.

6.16.8 In summary, the scheme makes best use of previously developed land, and is centrally located. The site is within walking distance of Chalk Farm and St John's Wood tube stations. It is designed to achieve very high levels of air tightness, and insulation in order to minimise its consumption of energy once completed. It incorporates other technologies, such as the use of combined heat and power (CHP) plant, Photovoltaic technology and ground source heat pumps, green roofs and rainwater harvesting to supply WCs and water the landscaped garden areas, along with 'grey water' recovery in order to minimise its environmental impact.

6.17 Verified Views

6.17.1 The verified views were agreed with planning officers during pre-application discussions and site visits. These views produce a variety of perspectives of the final scheme, demonstrating how the scheme sits within the context of existing built environment and demonstrates its ability to broadly assimilate with surrounding buildings, impose a minimal visual impact on Primrose Hill, and preserve panoramic views from the park whilst optimising the potential of the site.

6.18 S. 106 Agreement

6.18.1 It is anticipated that a section 106 agreement will be required in relation to the development. It is envisaged that this would primarily address:

- Provision of affordable housing;
- Provision of environmental improvements;
- Contribution, if required, towards ongoing traffic level monitoring, and possible and possible ameliorative measures; and,
- Contribution towards education and health care
- CMP requirements

6.19 Conclusion

6.19.1 This is a complex site to successfully redevelop given the constraints imposed by the extensive subterranean Thames Water services infrastructure, the need to respect the setting of the adjacent Primrose Hill park, the wider views in which the site sits, and to provide a high-quality design, which reflects the character of the surrounding area.

6.19.2 Equally, from a land-use perspective, there is an expectation that the maximum appropriate contribution to the supply of housing will be made from underused or vacant sites such as this, and that the amount of affordable housing that the site is capable of delivering should be maximised.

6.19.3 There are a number of potentially conflicting policy objectives to be addressed - for example, the imperative to make best use of previously developed land and the need to provide a built form fully compatible with the existing character of the area.

6.19.4 In order to attempt to successfully address these considerations and reconcile these varying and competing policy objectives, the team have considered a number of options. These have been discussed and consulted upon with the council's officers, local amenity societies, councillors, and individual neighbours. This extensive pre-application consultation has allowed us to build up a detailed understanding of the various concerns which need to be taken into account, in order to provide a carefully considered set of proposals. The scheme submitted as a result of this work:

- provides an appropriate quantum of development for the site,
- optimises the delivery of residential units,
- avoids imposing an unacceptable impact on Primrose Hill (and views from it)
- maximises the delivery of affordable housing and other benefits,
- provides a sustainable form of development;
- delivers high-quality architecture and materials; and
- provides a high level of visual amenity to those living around the site.

6.19.5 On this basis, we conclude that the proposals provide significant planning benefits and accord with national, regional and local planning policy.

7.0 Appendix 01

- 7.1 Project Directory
- 7.2 Access Statement
- 7.3 Strategic Views / CGI's
- 7.4 Area & Accommodation Schedules
- 7.5 Drawing Issue List
- 7.6 Existing Surveyed Drawings
- 7.7 S+P Proposed Drawings

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7.2 Access Statement

This Access Statement has been prepared in support of the Planning Application, on behalf of CIT Developments Ltd.

- 7.2.1 The purpose of this statement is to outline the overall approach to inclusive design within the scheme in accordance with the relevant local and national planning guidance, along with how the different access principles will be implemented into the scheme and managed.
- 7.2.2 The scheme provides a safe, legible, high quality environment that will be easily used by as wide a range of people as possible without undue effort, special treatment or separation.
- 7.2.3 The site will benefit from access to and from either St. Johns Wood station on the Jubilee Line or from Camden Town on the Northern Line to Chalk Farm. Local bus route 274 runs along Prince Albert Road, providing other links to either Lancaster Gate in the west or to the City in the east. The A40 main road runs just west of the site, connecting it with Central London or onto the North Circular. A main cycle route also runs along the Prince Albert road, south of the site. The site is also a short distance from the Regents Canal walkway connecting pedestrians to Camden and Kings Cross in the east or Maida Vale and Warwick Avenue in the west. A docking station for 24 Boris bikes are also located just south of the site on Prince Albert Road.
- 7.2.4 Collectively, these nodes provide the site with a variety of public nodes. The development proposals will continue this existing good level of accessibility to the mobility impaired, in line with requirements set out in National Guidance, the Camden UDP and the London Local Development Framework.
- 7.2.5 The key points of the proposed development are as follows:
- **36** dwelling units and **1** 2-bed family house;
 - Ramped access into all buildings;
 - 1 main entry lobby at ground level into Block 02 with direct access into the Blocks 01 and 03;
 - Basement parking area for **37** vehicles, including **4** wheelchair accessible spaces;
 - Secure storage for **60** bicycles in the basement;
 - A small family house level with St. Edmunds Terrace;
 - One main ramped entrance road into the site, which is level at reception point. Also to be used as a service, delivery and drop-off route for refuse vehicles.

- 7.2.6 The principal challenge to maintaining an inclusive environment on this site is dealing with the level difference between the site and the surrounding roads and site entry points. This is overcome with the use of ramps and gently sloping hard surfaces of a maximum gradient of 1 in 20 where necessary. It is acknowledged that the environment created is by definition simply 'accessible' and not 'inclusive'.
- 7.2.7 The south entrance to the site from St. Edmunds Terrace is set at a level of +44.44m AOD, which then elevates to a maximum height of +55.00m AOD at northwest corner of the site. The site entrance is elevated at +48.60m AOD and the landscaped areas between blocks are level at +48.55m AOD. Access to the entrance is via a 1:28 sloped ramp, which then increases to 1:12 towards the exit. Access to the Thames Water abstraction borehole is via a ramped road and the ramped access road to the west of the site leads to the Thames Water reservoir.
- 7.2.8 The refuse storage is located within the basement. Access into this storage space is via internal stairs or by lift, all with flush thresholds. Refuse collection would require the bins to be brought outside for collection.
- 7.2.9 The following documents have been referred to in the development of the scheme:
- British Standard 8300:2001
 - Part M of the Building Regulations
 - Lifetime Homes
- 7.2.10 All flats within the blocks of the development are capable through detailed design of meeting Lifetime Home Standards. Ten percent of all accommodation has been allocated adaptable for wheelchair use and section 6.7 contains drawings thereof.

Parking and Access into and around the Site

7.2.11 Tube Service

St Johns Wood & Camden tube stations are currently not accessible to wheelchair users, and help to platform levels needs to be assisted by staff members.

7.2.12 Bus Services

Low floor buses operate on the route along Prince Albert Road, at the south of the site, facilitating access for the mobility impaired.

7.2.13 Parking

- There are a total of 37 basement parking spaces in the development all to be used by residents of the blocks.
- Disabled parking has been provided in line with the Borough guidance. 4 wheelchair accessible parking spaces have been located in close proximity to the lift cores for convenience.
- More than one bicycle space for every unit, plus one additional space for 3-4 bed units, has been provided for residential use, in line with the LBC guidance.
- Three lift and stair cores connect the basement level to the units.
- The basement is accessed via a ramp located on the east facade of Block 3.

7.2.14 Access into and around the buildings

- Access from St Edmunds Terrace is via a gently sloping road ramp which rises to become level with the main entrance. Access to all ground floor residential units is from this single main entrance.
- Access to the Thames Water abstraction borehole to the east of the site will be via a gently sloping ramp.
- The Thames Water access road to the west of the site will also be via a sloped ramped access road.
- All routes are minimum 1200mm wide.
- Dropped kerbs will be provided as appropriate.
- Surfacing will be robust, suitable non-slip stone pavements.

7.2.15 Access into the Building

- Flush thresholds are provided into ground floor flats from the pedestrian route.
- Flush thresholds are provided into main residential cores in all 3 Blocks.
- Handrails to ramps above 1:20 and stairs will be suitably detailed
- Minimum clear width to ramps and stairs is 1200 mm.
- Main residential entrances will have power assisted doors.

7.2.16 Within the Building - Access to Homes

- Residential entrances are provided with adequate space to manoeuvre, to suit Part M and the Wheelchair Housing Design Guide.
- All corridors are minimum 1200mm clear width.
- Flush thresholds are provided into all apartments.
- Flush thresholds are provided into all lift lobbies.

7.2.17 Within the Building - Elsewhere

- All service corridors are minimum 1200mm clear width.
- Refuse stores are provided with flush thresholds at ground level.
- Bicycle stores are provided with flush thresholds at ground level.

7.2.18 Communications and Controls

- This will be addressed in detail design.
- Generally, signage will be clear, legible and consistent within the buildings. Consideration will be given to providing auditory signals for the visually impaired and visual signals for the auditory impaired, for example lift signals.
- All fire alarms to be both visual and auditory; these will be addressed further during detail design.

7.2.19 Evacuation and Means of Escape

- In the event of emergency, evacuation of the building is by stairwell.
- All three buildings include full fire fighting stairs for means of escape.

7.2.20 Building Maintenance

- The development will be maintained by a company appointed by CIT Development Ltd. This will apply to both internal and external areas.
- All windows have openable doors and can be cleaned from inside the flats.
- The fourth & fifth levels can be cleaned from the terraces.
- Bay windows will need to be cleaned by abseiling; hooks will be incorporated onto the penthouse levels.
- A latch-way system will be incorporated onto the roofs and access will be via a ladder and hatch from the staircase.
- External landscaping will be maintained.
- Any problems with lifts or other amenities will be addressed as soon as the need arises.

Standards in Dwellings

The apartments should be suitable homes for all purchasers regardless of changes in personal ability or circumstance. The measures to achieve this are detailed below.

7.2.21 British Standards

All apartments are capable of being developed to meet BS8300:2001.

7.2.22 Lifetime Homes Standards

All apartments are being developed to meet Lifetime Homes Criteria as explained in detail below:

Standard 1

Approach widths to all entrances are minimum 900 mm wide. The access route to the front door is level and the threshold flush.

Standard 2

Ground Level approaches to entrances will have gradients not exceeding 1:20. The distance between core lobbies and disabled car parking spaces at Basement and Ground Levels has been kept to a minimum.

Standard 3

Approaches to all entrances are level or gently sloping.

Standard 4

Level thresholds and suitable illumination will be provided in detail design to suit the Standard.

Standard 5

All internal and lifts cars will have minimum dimensions of 1100 x 1400mm. All lifts are fully wheelchair accessible.

Standard 6

The width of internal doorways and hallways will comply with the standard set out, and 300mm will be provided to the leading edge of all doors into flats and all doors within flats.

Standard 7

All habitable rooms have been provided with adequate wheelchair turning space.

Standard 8

All living rooms are at entrance level to each apartment.

Standard 9

There is a townhouse dwelling with ground plus one storey, and adequate space has been provided at entrance level for the inclusion of a temporary bedspace, if the need for one were to arise.

Standard 10

All dwellings have been designed with a wheelchair accessible entrance level WC. Drainage provision for future showers will be addressed in detail design to suit the Standard. Spatial requirements and door swing requirements will be addressed in detail design.

Standard 11

Provision for future adaptations such as handrails will be addressed in detail design.

Standard 12

Accommodation for future stair lifts in duplex flats will be addressed in detail design to suit the Standard. Accommodation for future platform lifts in the townhouse will be addressed in detail design.

Standard 13

Provision for future hoists will be addressed in detail design.

Standard 14

Final bathroom layouts will be addressed in detail design.

Standard 15

Living room glazing begins at 800mm or lower. Operation of windows will be easy to operate. These will be addressed further in the detail design.

Standard 16

Location of switches, sockets, ventilation, and service controls will be addressed in detail design.

7.2.23 Building Regulations Part M

Numerous Lifetime Home Standards overlap with requirements in Part M of the Building Regulations. The additional requirements provided under Part M include:

- * Tactile pavers will be provided, as required.
- * All disabled parking bays will have 1200mm access space to one side and another 1200mm safety zone on the vehicular side of the bays.
- * Access ramp flight gradients and landings are in accordance with Part M regulations; no ramp is steeper than 1:20, or has a going greater than 10 metres, or a rise of more than 500mm.
- * External stair widths will be no less than 1.2m and flights between landings will have a rise of no more than 12 risers.
- * Maximum rise of 150mm for external stairs.

7.2.24 Disabled Housing Standards

Additional consideration will be taken to ensure 10% of the apartments are capable of adaption for wheelchair users. This will include:

- Refuse stores located as conveniently as possible. If necessary, refuse collection will be organised by the management.
- Ironmongery will be addressed in detail design.
- Post collection will be located as conveniently as possible. If necessary, it can be organised by the management.
- The exclusion of corners in corridors or hallways.
- Dwellings for wheelchair users will be addressed during detail design.