

Athlone House Application Ref: 2013/7242/P
Planning Statement Addendum
14th May 2014

1. Introduction

1.1. This addendum to the planning statement sets out the changes to the size of the proposed replacement dwelling, and the comparative measurements that result from submitted drawing no. 5201/103 Rev A, which shows a reduction in the size of the proposed basement of 63sqm. The atria measurements for the previous appeal scheme, the 2005 consented scheme and the current proposed replacement dwelling have also been updated with regard to RICS guidance. Further, Adam Architecture have thoroughly re-measured all areas for the 2005 consented and appeal scheme generally, which has resulted in some changes to these areas, that include:

- The inclusion of the consented basement areas in the Caenwood Court flats (which were omitted at the last appeal);
- A smaller basement area in the 2005 consented scheme

1.2. It updates paragraphs 7.11 –7.21 of the submitted planning statement.

2. Update to comparative measurements

Assessment – Replacement building

7.11 As agreed at the Inquiry, scenarios can be compared with reference to footprint, floorspace (above and below ground) and hardstanding, although overall floorspace (GEA) was afforded the greatest weight. The relevant comparative measurements are set out as follows:

Athlone House Measurements May 2014			
Floor	Size of Scheme (sq m)		
	2003 (A) - Building without institutional extensions	Appeal scheme	Current proposal
Basement (GIA)	226	1918	522
Footprint (GEA)	1450	1307	1078
GEA Total without basement (GIA)	2751	3033	2497
GEA Total including basement (GEA/GIA)	2977	4951	3019
Hardstanding		1838	1846

% Difference

	Previous appeal scheme compared with 2003 (A)	Current proposal compared with 2003 (A)	Current proposal compared with appeal Scheme
Footprint Total	-10%	-25.6%	-17.5%
GEA Total (without basement in GIA)	10.2%	-9.3%	-17.7%
GEA Total (including basement in GIA)	66.3%	1%	-39%

7.12. The proposed building represents a reduction **of footprint** of 25.6% compared with the 2003(A) baseline, and a reduction of 17.5% compared with the appeal scheme.

7.13 It sees the **total floorspace** reduced by 39% from the appeal scheme. **Above ground floorspace** is 9.3% less than the 2003(A) scenario and there is only a 1% increase in total floorspace from the 2003(A) scenario - an increase significantly below the LB Camden 'rule of thumb'. Given that the additional floorspace is entirely within a

basement, directly below the house, and with no external manifestation, we would argue that the additional floorspace within the basement can be disregarded anyway, noting that the Courts have established, when considering how to deal with a basement, the fact that it is below ground (and thus may have no effect on openness) will be a matter to be taken into account in the exercise of the judgement (see **Appendix 4 and 5**). If this approach is accepted, there is no increase in floorspace, and the 'rule of thumb' does not even become relevant. There is a 9.5% reduction in **hardstanding** from the 2005 consented scheme to the current proposal - from 2021 sqm to 1,846 sqm.

- 7.14. Further, the proposed building has seen its scale, bulk and mass reduced, and articulation increased from the appeal proposal, which directly responds to the Inspector's comments in para 27 of his decision in relation to the harm from the appeal scheme on the openness of the MOL.
- 7.15. Overall, the proposed replacement building will have no harmful impact on the openness of the MOL, given that it would occupy substantially the same site and be of substantially the same scale, mass, bulk and height. Only a 1% increase in floorspace is proposed over the appropriate benchmark and this has no external manifestations, being entirely invisible in the basement. The proposal is therefore in accordance with the first exception as provided by para 89 of the NPPF, and also the London Plan and local planning policy.

Limited infilling or the partial or complete redevelopment of previously developed sites

- 7.16. Although LB Camden's pre-application response letter considers this exception of para 89 of the NPPF not to apply to the site due to the imminent removal of its allocation as an MDS, we consider this to be an incorrect interpretation of the position. Quite apart from the fact that the MDS is still in existence as part of the development plan, even if it is subsequently removed, there will be no difference: the NPPF essentially applies the approach that used to be reserved for MDSs designated in development plans to all Green Belt land that can properly be said to constitute a previously developed site (which this clearly can).
- 7.17. The test is whether the proposed development would have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing/previous development. It is therefore firstly necessary to consider the relevant comparative measurements for the site as a whole. In this instance it is considered appropriate to include both the areas as they existed in 2003 and the 2005 consented figures as baselines on the basis that the flats approved as part of the consented scheme have been fully implemented (Caenwood Court).

7.18. The comparative measurements are set out as follows:

	2003	2005 permission	Previous appeal scheme	Current proposal¹
Footprint	4962	3788	4099	3870
Floorspace	7418	12993	15582	13591.7
Floorspace without basement		9834	10634.7	10096.7

% Difference

	2005 consent compared with 2003	Previous appeal scheme compared with 2003	Previous appeal scheme compared with 2005 permission	Current proposal compared with 2003	Current proposal compared with 2005 permission
Footprint Total	-24%	-17%	8%	-22%	2%
GEA Total	75.2%	110%	19.9%	83.2%	4.6%
GEA Total (without basement in GIA)	n/a	n/a	8.1%	n/a	2.7%

7.19. These show that in 2003, the total footprint was 4,962 sq m with total floorspace at 7,418 sqm. The scheme consented in 2005 involved a total footprint of 3,788 sq m which was only 76% of the 2003 footprint but its floorspace was 12,993 sq m, a 75.2% increase over the 2003 total floorspace. The effect of the appeal scheme was to increase the footprint up to 4,099 sq m which at 83% was still nearly a fifth smaller than the starting figure and 8% larger than the 2005 consent. The current proposal sees a 22% reduction in footprint from 2003 and only a 2% increase over the 2005 consented scheme. In terms of total floorspace the appeal scheme saw an increase of 110% over the 2003 floorspace and an increase of 19.9% over the 2005 consent. The current proposal sees only a 4.6% increase in total floorspace over the 2005 consent. When the basements are removed from this, which we consider entirely appropriate given that impact on openness is the key test here and both are invisible, then there is only a 2.7% increase.

¹ These figures reflect the applicant's commitment **not to** implement the 58.3sqm (GEA) extension to Caen Cottage, which was approved by the 2005 consent. This could be secured by way of a condition.

- 7.20. Further, as set out in the Landscape Visual Impact Assessment, the perceived visual impact from the proposed building is negligible or small magnitude for all but one of the views, and moderate only when viewed from Highgate school, as a result of the close proximity of the two sites, the loss of landscape structure from the north of the site along Hampstead lane and different roof form in the proposed building, which allows it to be seen.
- 7.21. The proposed development is therefore considered to accord with the exception criterion, and thus constitutes appropriate development in MOL.