

**King's College London
Hampstead Residence,
Kidderpore Avenue,
London NW3**

Planning Statement

July 2015

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3 July 2015
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1.0 INTRODUCTION

1.1 This Statement has been prepared on behalf of Mount Anvil Ltd and King's College London (the applicants) in support of an application for Planning Permission and associated applications for Listed Building Consent in relation to the proposed development of land which is currently known as the King's College Hampstead Residence and which is located on the northern side of Kidderpore Avenue in the London Borough of Camden.

1.2 The description of the proposed development is as follows:

"The creation of up to 156 residential dwellings by way of the conversion and refurbishment of four statutorily listed buildings: Kidderpore Hall, Maynard Hall, Skeel Library and The Chapel; the conversion and extension of three other buildings: Bay House, Dudin Brown Hall and Lady Chapman Hall; the demolition of three non-listed buildings and their replacement with three new buildings (Lord Cameron Hall, Rosalind Franklin Hall and Queen Mother's Hall), and the construction of new buildings within the grounds. The relocation and restoration of one statutorily listed building within the site: The Summerhouse; associated residents' facilities; associated hard and soft landscaping works including the removal of trees; the construction of a double storey basement including car and cycle parking and plant."

1.3 The proposals have been formulated by a design team including architects at Scott Brownrigg, engineers at Tully De'Ath and landscape consultants at Fabrik, all of whom are specialists with extensive experience in converting historic buildings in sensitive locations.

The Application Submissions

1.4 This Planning Statement forms part of an extensive suite of documentation which has been prepared in support of the applications, comprising:

- **Acoustic Assessment** prepared by RBA Acoustics;
- **Affordable Housing Statement** prepared by Quod;
- **Air Quality Assessment** prepared by Peter Brett Associates;
- **Arboricultural Report & Impact Assessment** prepared by Crown Consultants;
- **Archaeological Desk Based Assessment** prepared by CgMs;
- **Basement Impact Assessment** prepared by Tully De'Ath;
- **Daylight, Sunlight and Overshadowing Report** prepared by CHP Surveyors;
- **Design and Access Statement** prepared by Scott Brownrigg;
- **Energy Statement** prepared by NLG Associates;
- **Flood Risk Assessment** prepared by WSP incorporating a **Drainage Strategy** prepared by Tully De'Ath;
- **Heritage Statement** prepared by Montagu Evans;
- **Historic Buildings Reports** prepared by Scott Brownrigg;

- **Landscape Design Statement** prepared by Fabrik;
 - **Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment** prepared by The Ecology Consultancy;
 - **Student Accommodation Statement** prepared by King's College London;
 - **Sustainability Statement** prepared by NLG Associates; and
 - **Transport Assessment** prepared by Momentum incorporating a draft **Travel Plan**, and **Draft Construction Management Plan / Construction Logistics Plan** prepared by Momentum and Mount Anvil.
- 1.5 The application proposals have been subject of a significant amount of pre-application consultation. In addition to detailed discussions on technical matters with Officers of the local planning authority, Mount Anvil has consulted with members of the local community and their representatives.
- 1.6 The full range of consultation that was carried out is described in the **Statement of Community Involvement** which has been prepared by LCA and which is also submitted in support of these applications.

2.0 THE SITE & THE SURROUNDING AREA

The Application Site

- 2.1 The application site is on the northern side of Kidderpore Avenue, London, NW3. The extent of the application site is outlined in red on the map at **Figure 2.1**.

Figure 2.1 – Site Location



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- 2.2 The site extends to approximately 1.22 hectares and there are eleven buildings or structures on the site of which five are on the national list of buildings of special architectural or historic interest.
- 2.3 The buildings are summarised in **Table 2.1** and their locations are indicated on the aerial photograph below (**Figure 2.2**).

Table 2.1 – Buildings Currently on the Site

Building (Former Name)	Completion Date	Date Listed (Grade)
1. Kidderpore Hall (Old House)	1843	11 Aug 1950 (II)
2. Maynard Wing	1891	16 Jan 1996 (II)
3. Skeel Library	1903	16 Jan 1996 (II)
4. Dudin Brown	1905	not listed
5. Bay House (The Bay)	1921	not listed
6. Lady Chapman	1927	not listed
7. Chapel	1929	16 Jan 1996 (II)
8. Lord Cameron (Orchard I)	1935	not listed
9. Rosalind Franklin (Orchard II)	1965	not listed
10. Queen Mother's Hall	1982	not listed
11. The Summerhouse	Mid-19th Century	16 Jan 1996 (II)

Source – Queen Mary University of London; former names in parentheses.

Figure 2.2 – Aerial Photograph of the Site Showing Existing Buildings



Source – Mount Anvil.

- 2.4 Kidderpore Hall was completed in 1843 and is a stuccoed villa in a Greek Revival style. The age of the Summerhouse is unknown but from the evidence consulted and the description provided in the list entry, it is likely this was constructed by the occupiers of Kidderpore Hall in the mid-nineteenth century.
- 2.5 Following the purchase and occupation of Kidderpore Hall and the application site by Westfield College in 1890, the rest of the buildings were constructed on the site in different phases. The history of the site and the buildings upon it is set out in detail in the **Heritage Statement** that is submitted in support of the applications.
- 2.6 In brief, the Maynard Wing was completed in 1891. The Skeel Library was completed in 1903 and Dudin Brown Hall in 1905. The construction of Bay House in 1921, Lady Chapman in 1927-9, Lord Cameron Hall (Orchard Wing I) in 1935 and Rosalind Franklin (Orchard Wing II) in 1960s completed the quadrangle to the southeast of Kidderpore Hall. Queen Mother's Hall was completed in 1982.
- 2.7 The buildings are generally between three and four storeys in height including some attic / roof-level accommodation.
- 2.8 Many of these buildings or structures are inter-connected and the extent of each building (ie where one building ends and another begins) is not readily apparent in all cases. For example, it is possible to walk between Kidderpore Hall and Bay House at ground and first floor levels and it is possible to walk between Bay House, Skeel Library and Dudin Brown via internal corridors. Maynard Wing also has a corridor link to Bay House and Maynard Wing is linked to Lady Chapman by way of a corridor / bridge. Lord Cameron and Rosalind Franklin are also inter-connected.

- 2.9 Parts of the site are identified as Private Open Space. The Private Open Space is a designated Site of Importance for Nature Conservation (SINC) – CaBII09. The area of the SINC is 0.65 hectares and the habitat is scattered trees, tall herbs, grassland and planted shrubbery. The current extent of the SINC includes land to the rear of the vicarage and the church which is not within the application site.
- 2.10 There are a number of trees on the site. A tree survey undertaken by Crown Consultants (see the **Arboricultural Report**) identified sixty-eight trees on the site. Of these, nine have been assessed as Category A (high-quality), 18 as Category B (moderate quality), and 41 as Category C (low quality).
- 2.11 The site has PTAL of 2 according to TfL's Planning Information Database.
- 2.12 The existing vehicular access to the site is between Lord Cameron Hall and Dudin Brown. This gives access to a car park with capacity for approximately seven vehicles.

The Site's Lawful Use

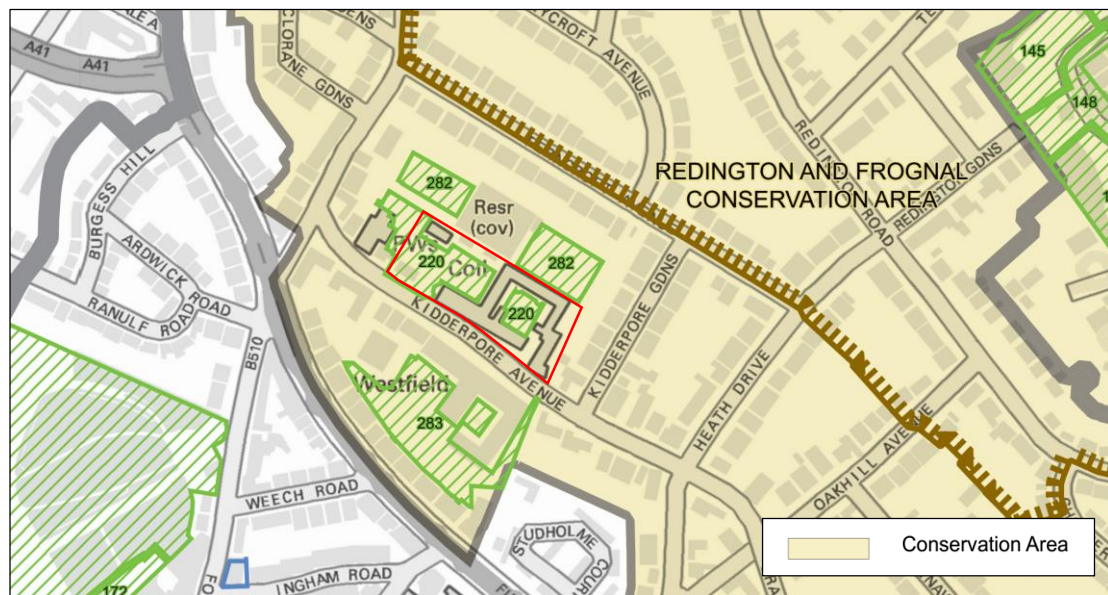
- 2.13 An application for Certificate of Lawfulness was submitted to the London Borough of Camden in May 2015 (2015/2414/P). As is explained in the documentation for that application, we consider that the site subject of these applications is a single planning unit and that currently the lawful use is student accommodation.

The Surrounding Area

- 2.14 The entire length of the south-eastern side of the site is bounded by Croft Way, a public footpath, and the entire length of the south-western side of the site is bounded by Kidderpore Avenue, a public highway. The entire length of the north-western side of the site is bounded by St Luke's Vicarage and land within the curtilage of that dwelling. The north-eastern boundary of the site is bounded by three parcels of land which are currently in use as two separate tennis clubs which are situated either side of a covered reservoir.
- 2.15 Land to the south-west of the site (on the opposite side of Kidderpore Avenue) is in residential use. Here there is the large 'Westfield' residential development and the adjacent site which is currently being redeveloped by Barratt Homes for residential accommodation and community use (a new building for the Hampstead School of Art) pursuant to planning permission 2013/0685/P.
- 2.16 Land to the south-east of the site (on Kidderpore Gardens) is generally in residential use and on land to the north-east of the site (beyond the reservoir and tennis clubs), residential land uses predominate. To the north-west is St Luke's Vicarage (a dwellinghouse) and then St Luke's Church.
- 2.17 The site is in the Redington and Frogna Conservation Area which, in most parts, is characterised by residential dwellings of a substantial size, set within individual garden plots. Residential properties on the roads of Heath Drive, Briardale Gardens and Ferncroft Avenue for example are either detached or semi-detached and display a variety of formal and free architectural styles which are typical of the late nineteenth century / early twentieth century

architecture which characterises the area. The location of the site within the Conservation Area is shown on **Figure 2.3** below.

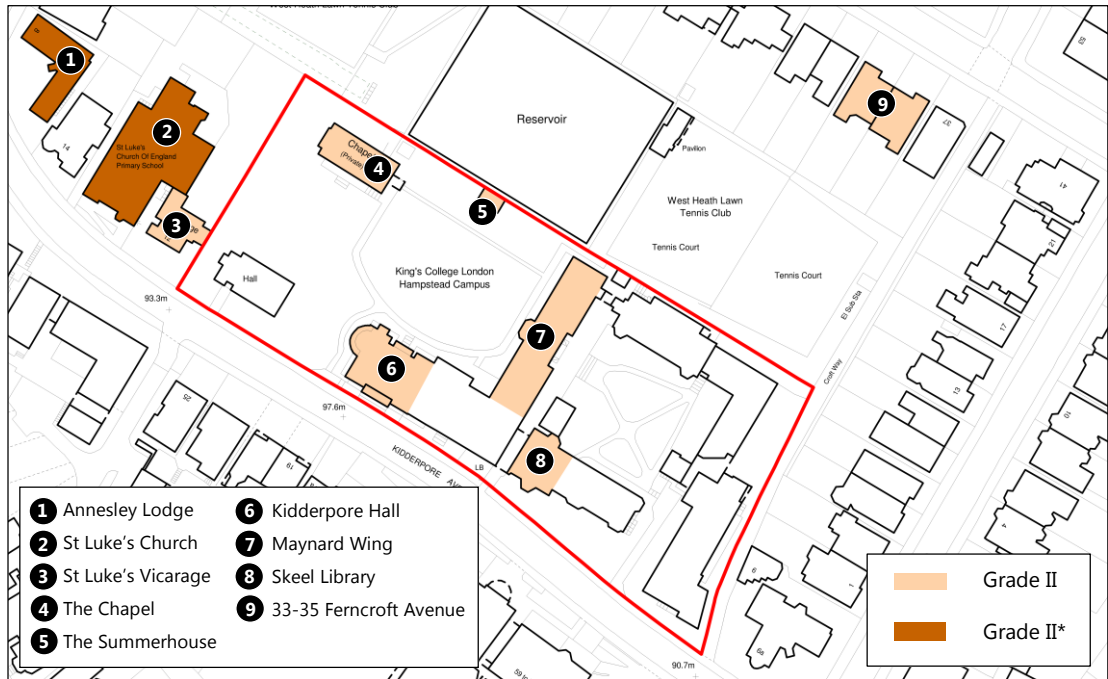
Figure 2.3 – Extract from Camden’s Planning Policies Map (2014)



Source – London Borough of Camden.

- 2.18 Building materials in the local area are generally red brick with clay tiled roofs, although some properties exhibit tile hanging and render. Residential properties often have white painted small-paned windows.
- 2.19 Mature trees and dense vegetation are a key part of the street scene, and street names of 'Avenues' and 'Gardens' reflect the green quality of the area. The vegetation contributes to the ecological value of the area.
- 2.20 A number of buildings in the immediate environs of the site are statutorily listed. The Church of St Luke's and the St Luke's Vicarage are listed at Grade II* and Grade II respectively. The Grade II* listed building of Annesley Lodge is located further to the north on the corner of Platt's Lane and Kidderpore Avenue. Further from the site on Ferncroft Avenue, the thoroughfare which is located beyond the reservoir to the north-east of the site, are two Grade II listed buildings at numbers 33 and 35. The location of these buildings in relation to the site is shown on **Figure 2.4**.

Figure 2.4 – Location of Listed Buildings on and Close to the Site (Indicative)



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3.0 PLANNING HISTORY OF THE APPLICATION SITE

- 3.1 Much of the site pre-dates the present-day Town and Country Planning system. It is nevertheless useful to note what has and has not been granted planning permission, conservation area consent, and listed building consent.
- 3.2 The site's main planning history events are set out in **Table 3.1**.

Table 3.1 – Planning History Summary (excluding works to trees)

Reference	Decision & Date	Building & Development
2015/2829/P	EIA Not Required 4 June 2015	Whole Site Request for Environmental Impact Assessment (EIA) Screening Opinion for works involving the proposed works at King's College Hampstead Residence site for 160 dwellings.
2015/2414/P	<i>Registered 11 May 2015</i>	Whole Site Certificate of Lawfulness confirming use of site as student accommodation.
2014/2538/P	Granted CLEUD 13 June 2014	Chapel & Adjacent Land Commencement of works in connection with use of premises as student accommodation as approved by planning permission granted on appeal (9500757R3) and listed building consent (9570359R3) dated 09/09/1997.
2008/1752/P	Part Granted / Refused 09 May 2008	Chapel & Adjacent Land Details of tree protection pursuant to condition 5 of planning permission (ref. 9500757R3) granted on appeal (ref. T/APP/X5210/A/96/273312/P2) dated 9th September 1997 (for the erection of a 3 storey building to provide 87 new residential student study bedrooms plus ancillary accommodation, together with the retention of existing chapel as a common room).
2008/0139/L	Withdrawn	Whole Site Details of the design of the inset spot lighting to the rear of old house pursuant to condition 2 attached to listed building consent granted on 25 September 2007 (ref 2007/0565/L) for installation of external lighting to various buildings and open spaces across the Kings College London Hampstead Campus.
2007/0562/P & 2007/0565/L	Granted PP & LBC 25 September 2009	Whole Site Installation of external lighting to various buildings and open spaces across the Kings College London Hampstead Campus.
2007/0392/P	Granted PP 21 March 2007	Lord Cameron Replacement of existing single-glazed metal framed windows and doors on all elevations with double-glazed metal framed units.
2006/4062/P & 2006/4063/L	Granted PP & LBC 13 November 2006	Old House / Kidderpore Hall Erection of railings to a single flight of stairs and open lightwell to the front elevation of Old House.
2006/3407/P & 2006/4067/L	Granted PP & LBC 26 October 2006	External Areas Reconfiguration and alterations to steps within the external courtyard of the students' hall of residence, including erection of new handrails and balustrades and laying of new ribbed hazard warning paving.

Reference	Decision & Date	Building & Development
2006/2427/L	Granted LBC 3 August 2006	Old House / Kidderpore Hall Alterations to doors and windows at ground floor level, educational use (Class D1), including replacement of modern timber, metal and louvred window fanlights with new timber sections and replacement of cementitious render with lime render to basement lightwell wall.
PWX0202287	Grant Approval of details 25 June 2002	Chapel & Adjacent Land Application for approval of details of landscaping and foundation design and construction working areas pursuant to conditions 5, 8 and 12 of planning permission ref: 9500757R3 (allowed on appeal) dated 9 September 1997 for erection of student accommodation. As shown on drawing numbers: 97408/08, Plant schedule, 97408/9A, 97408/10 (attached to management plan) 010489/01, 010489/02, 509/011, 509/010 RevA, 509/009, Method statement for foundation construction (dated 16 March 2002, Landscape Management Plan, Letter from Conisbee Struc Eng (dated 13 June 02) "Proposed Sequence of Excavation adjacent Yew Tree (Tree No4)".
PWX0202272	Grant Approval of details 8 July 2002	Chapel & Adjacent Land Approval of details of elevations and materials pursuant to conditions 3 and 4 of planning and listed building permission granted consent on appeal (Refs: 9500757/R3 and 9570359/R3) for student accommodation block. As shown on drawing no(s) 030, 031, 020, Agents Letter of 30th May 2002.
LWX0202273	Grant Approval of Details (Listed Bldg) 8 July 2002	Chapel & Adjacent Land Approval of details of elevations and materials pursuant to conditions 3 and 4 of planning and listed building consent granted on appeal 9th September 1997 (Refs: 9500575/R3 and 9570359/R3) for a student accommodation block.
LWX0202288	Grant Approval of Details (Listed Bldg) 8 July 2002	Chapel & Adjacent Land Approval of details of relocated existing summerhouse (including method statement), pursuant to additional condition 06 of listed building consent granted on appeal on 9th September 1997 (Ref: 9570359/R3 for student accommodation block, As shown on drawing no 009.
T/APP/X5210/A/96/273312/P2	Appeal Allowed 9 September 1997	Chapel & Adjacent Land Erection of a 3 storey building to provide 87 new residential student study bedrooms plus ancillary accommodation, together with the retention of existing chapel as a common room.

Reference	Decision & Date	Building & Development
9500757R3	Refused PP 26 April 1996	Chapel & Adjacent Land The erection of a 3 storey building to provide 87 new residential student study bedrooms plus ancillary accommodation, together with the retention of existing chapel as a common room; as shown on drawing numbers A51P(P)01B-04B, 05A, as revised by 509/S/P/01A, 9538/01, 77398/01, A51P(E)01-02, A51P(P)06-08, A51T(P)09, letters dated 27.10.95, 18.1.96, 29.1.96, 20.2.96, 27 photographs of the summerhouse and method statement ref: LDC/2/DGP.01/1.0/ A98.
9570359R3	Refused LBC 26 April 1996	Chapel & Adjacent Land The erection of new hostel accommodation within the curtilage of the listed building, together with the conversion of the former chapel to a common room and the relocation of the former summerhouse; as shown on drawing numbers A51P(P)01B-04B, 05A, as revised by 509/S/P/01A, 27 photographs of the summerhouse and method statement ref: LDC/2/DGP.01/1.0/A98.
9500757R2	Withdrawn 27 February 1996	Assumed to be Chapel & Adjacent Land Redevelopment to provide ninety new residential student study bedrooms plus ancillary accommodation. Retention of existing chapel as assembly hall. (REVISED PLANS SUBMITTED).
9570359R2	Withdrawn 27 February 1996	Assumed to be Chapel & Adjacent Land Conversion of new hostel accommodation within the curtilage of the listed building. (REVISED PLANS SUBMITTED).
9570359	Withdrawn 23 January 1996	Assumed to be Chapel & Adjacent Land Conversion of new hostel accommodation within the curtilage of the listed building. (Plans submitted).
9500757	Withdrawn 18 January 1996	Assumed to be Chapel & Adjacent Land Redevelopment to provide ninety new residential student study bedrooms plus ancillary accommodation. Retention of existing chapel as assembly hall. (Revised plans submitted).
9500934	Granted PP 22 February 1996	Maynard Wing Retention of an external fire escape stair as shown on drawing no(s) 9402/17A, 27, 28, Maynard Hall Of Residence Kings College London Kidderpore Avenue NW3.
32404R1	Granted PP 31 July 1981	Queen Mother's Hall The erection of a three storey building to provide new residential accommodation for students, comprising 24 single study bedrooms and a common room.
CTP/E4/9X/A/HB/827 and CTP/E4/9X/A/17784/R	Granted PP & LBC 2 Dec 1974	Bay House The carrying out of internal works and alterations to the front elevation to replace the existing window by a new window, door and steps at Bay House, Westfield College, Kidderpore Avenue, NW3.
TP/13758/W/909	Granted PP 6 April 1964	Possibly Rosalind Franklin (Drawings not Available) The erection of a four storey residential hall, at Westfield College, Kidderpore Avenue, Hampstead (described as a new building between two existing buildings).

Reference	Decision & Date	Building & Development
11866/16629	Granted PP 28 November 1960	Site of Rosalind Franklin The erection of a four storey addition to be used as an extension to the existing library on the lower ground and ground floors, with students' living accommodation on the first and second floors at Westfield College, Kidderpore Avenue, Hampstead <i>(note that drawing does not correspond with building that currently exists therefore we assume that this permission was not implemented).</i>

Source – London Borough of Camden.

4.0 THE PROPOSED DEVELOPMENT

- 4.1 The proposed development involves the retention of the site’s five listed buildings. Of those buildings, Kidderpore Hall, the Maynard Wing, the Chapel and the old Skeel Library will be sensitively converted to residential use. The listed Summerhouse will be restored in a new location on the site close to the Chapel.
- 4.2 Other unlisted buildings will also be retained and sensitively converted to residential use, namely Bay House, Dudin Brown, and Lady Chapman.
- 4.3 Three existing buildings (Lord Cameron, Rosalind Franklin and the Queen Mother’s Hall) will be demolished and replaced with new residential buildings.
- 4.4 New buildings are proposed in two locations on the site. The first is between the Chapel and Queen Mother’s Hall where ‘pavilion’ houses are proposed. The second is to the rear of the site where a terrace of ‘townhouses’ is proposed between the Chapel and the Maynard Wing on the site of the previously-consented student accommodation development, planning permission for which remains extant by virtue of the development having been commenced (see CLEUD 2014/2538/P).
- 4.5 In total, 156 residential units are proposed. The mix is set out in **Table 4.1**.

Table 4.1 – Proposed Residential Units

Size	Number
1 bedroom	51
2 bedroom	72
3 bedroom	23
4 bedroom	9
5 bedroom	1

Source – Scott Brownrigg.

- 4.6 Integrated in the Kidderpore Avenue elevation of the replacement for the Queen Mother’s Hall will be an access to a basement area where car parking for residents and visitors will be provided. In total 97 car parking spaces are proposed. The majority of the site’s cycle parking requirements (312 spaces) will also be accommodated in the basement. Some cycle parking – in particular that intended to be used by visitors, and amounting to 16 spaces – will be provided at ground floor level, carefully integrated into the hard and soft landscaping scheme. In total, therefore, there will be 328 cycle parking spaces.
- 4.7 The total amount of residential floorspace will be in the region of 22,275 sq m (GIA) including the basement area.
- 4.8 No non-residential land uses are proposed save for uses that may be ancillary to the main use of the site, for example residents’ facilities.
- 4.9 The proposed development will be liable to the Mayor of London’s and the London Borough of Camden’s Community Infrastructure Levy (‘CIL’). As is set out on Camden’s February 2015 CIL Strategic Funding List, the levy is to be used to pay for social infrastructure needs arising from the proposed development such as school places (early years, primary and secondary), health projects and community space amongst other things.

5.0 LEGISLATIVE AND PLANNING POLICY FRAMEWORK

The Statutory Development Plan

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that planning applications should be determined in accordance with the adopted Statutory Development Plan unless material considerations indicate otherwise.
- 5.2 In London the development plan for any area comprises the London Plan, the local plan and any neighbourhood plan that may have been adopted for the area in question.

Further Alterations to the London Plan March 2015

- 5.3 On 10 March 2015, the Mayor published the Further Alterations to the London Plan (FALP). From this date, the FALP are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the development plan for Greater London.

Camden's Local Plan

- 5.4 Camden's current local plan comprises a series of documents, not all of which (such as location-specific area action plans) are relevant to the determination of this planning application.
- 5.5 The documents of relevance to this planning application are as follows:
- Core Strategy (adopted November 2010);
 - Development Policies (adopted November 2010);
 - Site Allocations (adopted September 2013); and
 - Camden's Planning Policies Map (2014).

Neighbourhood Plan

- 5.6 There is no neighbourhood plan in force in the area within which the application site is situated.

Other Policy and Guidance Material Considerations

- 5.7 There are other policy and guidance material considerations to which regard may need to be paid in determining these applications. These include:
- the National Planning Policy Framework (March 2012) and the associated Planning Practice Guidance;
 - Camden's Supplementary Planning Guidance;
 - the Mayor of London's Supplementary Planning Guidance; and
 - guidance from Historic England in relation to heritage assets.
- 5.8 Emerging planning policy can also be a material consideration. Camden Council is currently reviewing its planning policies and undertook a first round of consultation on a draft 'Local Plan' in early 2015. Montagu Evans made representations on behalf of King's College London and Mount Anvil Ltd.
- 5.9 Camden Council says on its website that it is expecting to produce an updated version of the Local Plan for further consultation later in 2015.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.10 There are a number of heritage assets that will be affected by the proposed development including statutorily-listed buildings and a conservation area. The provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 are therefore of relevance.

Listed Buildings

- 5.11 Section 66 of the Act says that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Conservation Areas

- 5.12 Section 72 of the Act says that, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Case Law

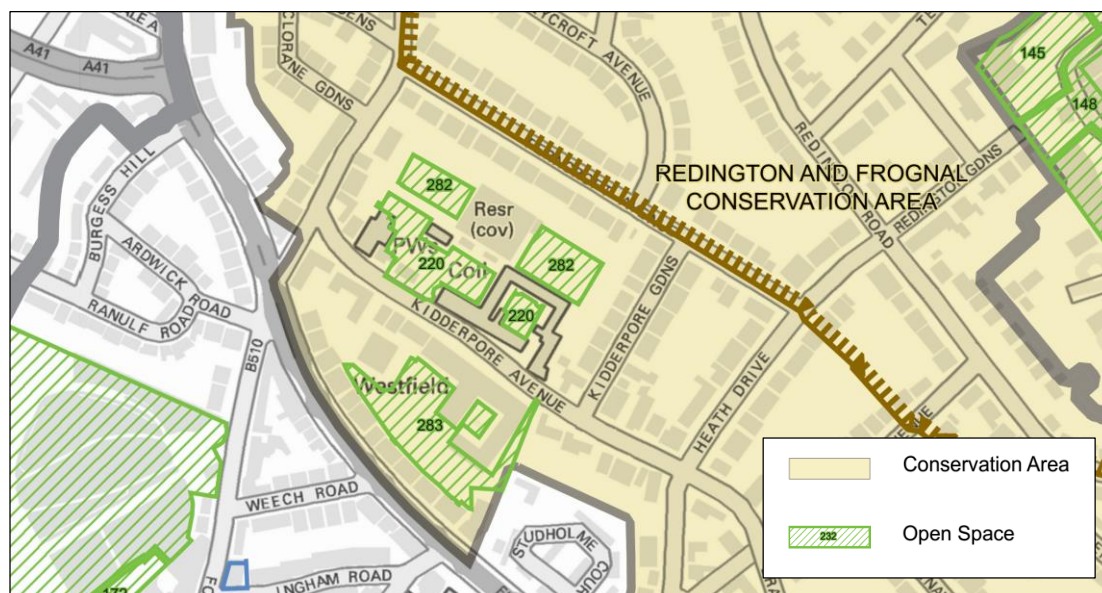
- 5.13 Recent decisions in the Courts provide salient case law on decisions relating to applications which have an impact upon the significance of designated heritage assets, in particular, listed buildings.
- 5.14 In preparing our analysis we are mindful of the weight attached to the preservation or enhancement of the setting of heritage assets which was recently clarified by the Court of Appeal judgement in *Barnwell Manor Wind Energy vs East Northamptonshire et al* [2014]. The Court held that "*to make an assessment of the indirect impact of development or change upon an asset it is first necessary to make a judgement about the contribution made by its setting*". In turn, the decision ruled there is a "*strong presumption*" against granting planning permission for development which would cause harm to heritage assets precisely because the desirability of preserving the special interest is of "*considerable importance and weight*".

6.0 RELEVANT PLANNING POLICIES

Site Allocations / Designations

- 6.1 On Camden's current Planning Policies Map, an extract of which is at **Figure 6.1**, and in the Council's Site Allocations document, the site is not allocated for any particular land use.

Figure 6.1 – Extract from Camden's Planning Policies Map (2014)



Source – London Borough of Camden.

- 6.2 On the Planning Policies Map, parts of the site are indicated as being Private Open Space / a borough grade II SINC.
- 6.3 Such land is subject of **Policy CS15** (*Protecting and improving our parks and open spaces and encouraging biodiversity*). The relevant parts of this policy state that:

"The Council will protect and improve Camden's parks and open spaces. We will:

- a) *protect open spaces designated in the open space schedule as shown on the proposals map, including our Metropolitan Open Land, and other suitable land of 400 sq m or more on large estates with the potential to be used as open space..."*

"The Council will protect and improve sites of nature conservation and biodiversity, in particular habitats and biodiversity identified in the Camden and London Biodiversity Plans in the borough by:

- d) *designating existing nature conservation sites;*
- e) *protecting other green areas with nature conservation value, including gardens, where possible;*
- g) *expecting the provision of new or enhanced habitat, where possible, including through biodiverse green or brown roofs and green walls;*
- j) *protecting trees and promoting the provision of new trees and vegetation, including additional street trees."*

- 6.4 The similar policy in the London Plan (**Policy 7.18 – Protecting Open Space and Addressing Deficiency**) says the following:
- “The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.”*
- 6.5 We will return to this consideration in **Section 9.0** of this Statement.
- 6.6 The Policies Map also shows that the site is within a conservation area, the Redington and Frogal Conservation Area.
- 6.7 As such, the development is subject of **Policy CS14 (Promoting high-quality places and conserving our heritage)** which says *inter alia* that the Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by: requiring development of the highest standard of design that respects local context and character; and preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas.
- 6.8 **Policy DP25 (Conserving Camden’s heritage)** is also relevant. In relation to conservation areas, this policy says that in order to maintain the character of Camden’s conservation areas, the Council will:
- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
 - b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
 - c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
 - d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
 - e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden’s architectural heritage.
- 6.9 An assessment of the character of the Redington and Frogal Conservation Area, which assists in the application of the aforementioned policy, is set out in the **Redington and Frogal Conservation Area Statement** which was adopted in January 2003 and which is a material consideration.
- 6.10 London Plan policy in relation to heritage assets is also of relevance. With regard to conservation areas, the following parts of **Policy 7.8 (Heritage Assets and Archaeology)** are considerations:
- development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate; and
 - development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

- 6.11 We will consider the effects of the proposed development on heritage assets in **Section 10.0**.

Policies Relating to Existing Land Uses

- 6.12 As is evident from the summary of the site's planning history in **Section 3.0** of this Statement, there is no absolute documentary evidence (in terms of planning permissions for each building) as to the use of the whole Site. This is because of the historic nature of the Site – many of the existing buildings pre-date the post-1947 Town and Country Planning system – and as such evidence of the grant of express planning permission for most buildings does not exist.
- 6.13 Because of this, an application for a Certificate of Lawfulness of Existing Use was submitted to the London Borough of Camden in May 2015 (reference 2015/2414/P). The accompanying Statement (which is available on the Council's website) explained that the site is one planning unit and that the use of that planning unit is student accommodation.
- 6.14 On that basis, the Council's policy which relates to student accommodation is the starting point for the assessment of the acceptability of this planning application for Class C3 residential use.
- 6.15 **Policy DP9** (*Student housing, bedsits and other housing with shared facilities*) says *inter alia* that:

"The Council will resist development that involves the net loss of student housing unless either:

- k) adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves; or*
- l) the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Camden or adjoining boroughs."*

- 6.16 The policy also states that:

"Where the Council is satisfied that a development involving the loss of student housing, bedsit rooms or other housing with shared facilities is justified, we will expect the development to provide an equivalent amount of residential floorspace for permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to policy DP3."

Policies Relating to the Principle of the Proposed Land Use

Camden's Policies

- 6.17 Camden's Core Strategy explains the importance that the Council attaches to the creation of new housing. At **Policy CS6** (*Providing Quality Homes*) it is stated that:
- the Council will aim to make full use of Camden's capacity for housing;
 - housing is Camden's priority land-use;
 - the Council will aim to secure high-quality affordable housing available for Camden households that are unable to access market housing; and

- the Council will aim to minimise social polarisation and create mixed and inclusive communities.

6.18 **Policy DP2** (*Making full use of Camden's capacity for housing*) also emphasises the importance that the Council attaches to housing including affordable housing. It says that the Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing, by:

- a) expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site;
- b) resisting alternative development of sites considered particularly suitable for housing; and
- c) resisting alternative development of sites or parts of sites considered particularly suitable for affordable housing, homes for older people or homes for vulnerable people.

6.19 **Policy DP3** (*Contributions to the supply of affordable housing*) then sets out the Council's expectation that all residential developments with a capacity for 10 or more additional dwellings will make a contribution to affordable housing. Whilst the policy allows for off-site provision or payments *in lieu*, it is explained that it is expected that affordable housing should usually be provided on-site.

6.20 Further information on the operation of Camden's affordable housing policy is set out in *Camden Planning Guidance 8 – Planning Obligations*. The current version is that which was adopted in February 2015. A revised draft was published for consultation in March 2015.

6.21 **Policy DP5** (*Homes of Different Sizes*), which sets out the Council's approach to achieving a mix of dwellings on development sites, is also of relevance in relation to the provision of housing.

London Plan Policies

6.22 Housing is also a priority land use in the London Plan. **Policy 3.3** sets out the Mayor's aim to increase housing supply and at **Policy 3.4** (*Optimising Housing Potential*) it is stated that:

"Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted."

6.23 In urban areas with PTALs of 2 to 3, Table 3.2 indicates that densities in the range of 200 to 450 habitable rooms per hectare or 45 to 170 units per hectare could be acceptable.

6.24 As with Camden's policies, the London Plan seeks to achieve mixed and balanced communities (**Policy 3.9**) in terms of tenure.

6.25 In relation to affordable housing, **Policy 3.12** (*Negotiating Affordable Housing on Individual Private Residential and Mixed-use Schemes*) says that:

"The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes".

6.26 The policy also notes that:

- negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements; and
- affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash *in lieu* contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

National Policy

6.27 As well as the strong support for new housing in the development plan, a key aim of national planning policy is to "*boost significantly the supply of housing*" (paragraph 47 of the NPPF).

Other Policies & Guidance

6.28 There is, of course, a wide range of other policies that will have to be taken into account in determining these applications.

National Policies

6.29 At the heart of the 2012 **National Planning Policy Framework** is a presumption in favour of sustainable development which, the document tells us, should be seen as a 'golden thread' running through decision-taking (paragraph 14). This paragraph goes on to state that:

"For decision taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out of date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies within this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted".*

6.30 The NPPF sets out a range of policies including on housing, transport, design and the historic and natural environments, policies with which local plans and the London Plan have to be in general conformity. Given that the most recent alterations to the London Plan and Camden's development policies were adopted following the publication of the NPPF, we consider that the those documents must be in general conformity and, so, we do not explain the provisions of the NPPF in detail here, although we will return to them later in this Statement.

6.31 At this point, however, we should note that notwithstanding that the aforementioned documents have been formulated in the context of the NPPF, the NPPF remains a material considerations in the determination of these applications.

6.32 The NPPF is supported by the **National Planning Policy Guidance** which was published on 6 March 2014 as a web-based resource and which sets out guidance on the application of national policy.

London Plan Policies and Related Guidance

6.33 In the version of the London Plan that was published on 10 March 2015, the policies to which regard should be paid in addition to those already mentioned are as follows:

Housing:

- Policy 3.5 Quality and Design of Housing Developments;
- Policy 3.8 Housing Choice;

Energy & Sustainability:

- Policy 5.2 Minimising Carbon Dioxide Emissions;
- Policy 5.3 Sustainable Design and Construction;
- Policy 5.6 Decentralised Energy in Development Proposals;
- Policy 5.7 Renewable Energy;
- Policy 5.8 Innovative Energy Technologies;
- Policy 5.9 Overheating and Cooling;
- Policy 5.10 Urban Greening;
- Policy 5.11 Green Roofs and Development Site Environs;
- Policy 5.12 Flood Risk Management;
- Policy 5.13 Sustainable Drainage;
- Policy 5.14 Water Quality and Waste Water Infrastructure;
- Policy 5.15 Water Use and Supplies;
- Policy 5.16 Waste Net Self-sufficiency;

Transport:

- Policy 6.3 Assessing Effects of Development on Transport Capacity;
- Policy 6.9 Cycling;
- Policy 6.10 Walking;
- Policy 6.13 Parking;

Inclusivity, Design and Heritage:

- Policy 7.1 Lifetime Neighbourhoods;
- Policy 7.2 An Inclusive Environment;
- Policy 7.3 Designing Out Crime;
- Policy 7.4 Local Character;
- Policy 7.5 Public Realm;
- Policy 7.6 Architecture;
- Policy 7.8 Archaeology and Heritage Assets;
- Policy 7.9 Heritage-led Regeneration;
- Policy 7.14 Improving Air Quality;
- Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes;
- Policy 7.18 Protecting Open Space and Addressing Deficiency; and
- Policy 7.19 Biodiversity and Access to Nature.

6.34 A number of the Mayor's supplementary planning guidance documents are also of relevance to the assessment of the proposed development, in particular:

- Accessible London: Achieving an Inclusive Environment (April 2004);
- Housing (November 2012) and the draft revised Housing SPG (May 2015); and
- Sustainable Design and Construction (April 2014).

Camden's Core Strategy Policies

6.35 In addition to the policies already mentioned, other 2010 Core Strategy policies of relevance are:

- Policy CS11 Promoting Sustainable and Efficient Travel;
- Policy CS13 Tackling Climate Change through Promoting Higher Environmental Standards;
- Policy CS14 Promoting High-quality Places and Conserving our Heritage;
- Policy CS17 Making Camden a Safer Place; and
- Policy CS18 Dealing with our Waste and Encouraging Recycling.

Camden's Development Policies

6.36 In addition to the policies already mentioned, other 2010 Development Policies of relevance are:

- Policy DP1 Mixed-use Development;
- Policy DP6 Lifetime Homes and Wheelchair Housing;
- Policy DP16 The Transport Implications of Development;
- Policy DP17 Walking, Cycling and Public Transport;
- Policy DP18 Parking Standards and Limiting the Availability of Car Parking;
- Policy DP19 Managing the Impact of Parking;
- Policy DP21 Development Connecting to the Highway Network;
- Policy DP22 Promoting Sustainable Design and Construction;
- Policy DP23 Water;
- Policy DP24 Securing High-quality Design;
- Policy DP25 Conserving Camden's heritage (*which, in addition to conservation areas as already discussed, deals with listed buildings*);
- Policy DP26 Managing the Impact of Development on Occupiers and Neighbours;
- Policy DP27 Basements and Lightwells;
- Policy DP28 Noise and Vibration;
- Policy DP29 Improving Access; and
- Policy DP32 Air quality and Camden's Clear Zone.

Other Camden Policy and Guidance

Camden's Planning Guidance

6.37 Camden Planning Guidance documents of relevance, other than CPG which has already been mentioned, are as follows:

- CPG1 Design (September 2014);
- CPG2 Housing (September 2013);
- CPG3 Sustainability (September 2013);
- CPG4 Basements and Lightwells (September 2013);
- CPG6 Amenity (2011); and
- CPG7 Transport (2011).

Camden's Emerging Planning Policies

6.38 We noted earlier in this Statement that Camden is in the process of reviewing its local plan and that Montagu Evans has made representations in relation to the first draft plan that was published in early 2015.

- 6.39 The emerging local plan broadly covers the same considerations as the current Core Strategy and Development Policies documents. At this early stage in the consultation process, however, the draft document can be given very little weight. As such, we do not set out the proposed policies separately here.

Historic England Guidance

- 6.40 In April 2015, Historic England (formerly English Heritage) published new guidance in line with the NPPF which provides advice to owners, developers, applicants and local planning authorities on development which could have an effect on the historic environment.
- 6.41 Three Historic Environment Good Practice Advice in Planning Notes (GPA) have been produced. GPA2 (*Managing Significance in Decision-Taking in the Historic Environment*; 27 March 2015) and GPA3 (*The Setting of Heritage Assets*; 25 March 2015) are relevant in considering these applications.
- 6.42 These documents are considered in more detail in the **Heritage Statement** submitted with these applications.

7.0 ASSESSMENT – THE EXISTING LAND USE

Introduction

7.1 In **Section 6.0** of this Statement we explained that **Policy DP9** (*Student housing, bedsits and other housing with shared facilities*) is the starting point in assessing the acceptability of the proposed development, specifically in terms of whether the loss of the existing land use is acceptable.

7.2 That policy sets out tests in the alternative. It says that the Council will resist development that involves the net loss of student housing unless either:

- adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves; or
- the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Camden or adjoining boroughs.

7.3 In this case the student accommodation has been replaced by new accommodation for students of King's College London.

King's College London's Re provision of Student Accommodation

7.4 The College's residential accommodation strategy since the early 2000s has been to meet a planned increase in student recruitment and to meet the demand from students for modern, high-quality accommodation in central locations, close to their academic campuses.

7.5 When the College acquired the Hampstead site in the early 1990s its then intention was to utilise the site both as an academic campus with teaching and learning facilities, as well as providing student accommodation. At that time, the College needed to replace facilities at Kensington and Chelsea which had been released in order to consolidate the College's estate to the north and south of the river. The later merger with the United Medical and Dental Schools at Guy's and St Thomas' Hospital at the end of the 1990s led to a further reorientation of the College's academic campuses south of the river and, as a result, for the last 15 years the Hampstead campus has been entirely residential in nature.

7.6 Although it enjoyed some favourable attributes, the location of the Hampstead Residence was always considered to be problematic. While a Zone 2 location was not unreasonable, the actual location of the residence, some 15 minutes' walk from the nearest London Underground station, was not an advantage.

7.7 Efforts to release non-residential buildings on the site to realise funds for future reinvestment led to the sale of the southern site in 2006 to Barratt West London.

7.8 Between 2006 and 2012 there were extended efforts to source new sites and other residential development opportunities in order to release the remainder of the Hampstead site.

7.9 As is explained in the **Student Accommodation Statement** that has been produced by King's College London and which has been submitted in support of this planning application, the College has delivered new accommodation at Champion Hill and is pursuing other

opportunities to effect a significant increase in the amount of student accommodation such as at Surrey Quays. These developments are in addition to other new student accommodation facilities which have been delivered for use by King's College London students, for example Moonraker Point (Popock Street, SE1) and Stratford One (International Way, E20).

- 7.10 On the basis of the information provided by King's College London in the **Student Accommodation Statement** we consider that **Policy DP9** has been satisfied and that it is therefore acceptable to look at an alternative use on the application site.

Other Policy DP9 Provisions

- 7.11 In **Section 6.0** we also highlighted that **Policy DP9** says that:

"Where the Council is satisfied that a development involving the loss of student housing, bedsit rooms or other housing with shared facilities is justified, we will expect the development to provide an equivalent amount of residential floorspace for permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to policy DP3."

- 7.12 Thus the Council sets out a clear position requiring at least some residential development on sites such as that subject of these applications.

- 7.13 We will discuss the proposed land use in the next section of this Statement.

8.0 ASSESSMENT – THE PROPOSED LAND USE

8.1 These applications propose Class C3 residential use and ancillary facilities.

Policy DP9 Requirements

8.2 In the previous section of this Statement we noted that **Policy DP9** of Camden's 2010 *Development Policies* document seeks an equivalent amount of Class C3 residential floorspace to that which was previously in use as student accommodation where the loss of the student accommodation has been justified.

8.3 This aim will be met by the proposed development. Although there will be some minor physical changes that will provide some additional floorspace in Bay House and Lady Chapman, the conversion of the following buildings from student accommodation to Class C3 will result in a broadly similar amount of Class C3 floorspace being provided:

- Kidderpore Hall;
- Bay House;
- Skeel Library;
- Dudin Brown;
- Maynard Wing;
- Lady Chapman; and
- The Chapel.

8.4 Other student accommodation in the following buildings will be replaced:

- Lord Cameron Hall;
- Rosalind Franklin; and
- Queen Mother's Hall.

8.5 In each case, however, there will be an increase in the amount of Class C3 floorspace to be provided.

8.6 Further Class C3 floorspace will be provided in the form of the townhouses on the north-eastern side of the site and the pavilion houses between The Chapel and the site of the Queen Mother's Hall.

8.7 Thus the relevant provision of **Policy DP9** will be satisfied by the proposed development.

Policy Support for Residential-only Development

8.8 During the pre-application public consultation exercises undertaken by Mount Anvil, a number of parties advocated the provision of non-residential uses on the site in addition to residential use; some parties suggested that school floorspace should be provided and other suggested that general use community floorspace should be provided.

8.9 As already explained, **Policy DP9** seeks provision of an equivalent amount of Class C3 floorspace, and aim that can be achieved by the proposed development. Indeed, an increase in floorspace is proposed. In theory, therefore – and when considered alone – **Policy DP9** could be satisfied if other uses were proposed in that additional amount of floorspace.

- 8.10 The important point here, however, is that **Policy DP9** cannot be considered on its own – regard must be paid to all other applicable development plan policies and other material considerations.
- 8.11 Development plan **Policy DP1** (*Mixed-use Development*) promotes mixed-use development although it is acknowledged that in some circumstances a mix of uses may not be appropriate. Factors that the Council would take into account include:
- the character of the development, the site and the area;
 - site size, the extent of the additional floorspace, and constraints on including a mix of uses;
 - the need for an active street frontage and natural surveillance;
 - the economics and financial viability of the development including any particular costs associated with it;
 - whether the sole or primary use proposed is housing;
 - whether secondary uses would be incompatible with the character of the primary use;
 - whether an extension to the gross floorspace is needed for an existing user;
 - whether the development is publicly-funded; and
 - any other planning objectives considered to be a priority for the site.
- 8.12 Housing (generally, we will discuss affordable housing below) is a priority land use in London as is evident from **Policy 3.4** of the London Plan and the priority attached to housing is made clear in Camden’s Core Strategy (**Policy CS6**).
- 8.13 In addition, **Policy DP2** clearly states that the Council will resist alternative development of sites that are considered particularly suitable for housing.
- 8.14 In our view this site is particularly suitable for housing – particularly given the nature of the surrounding environment – and there is no identified need in the development plan for other uses on this site. Consequently, the preferred use of any additional floorspace over and above that necessary to satisfy **Policy DP9** is, in terms of development plan policy, Class C3 housing.

Affordable Housing

- 8.15 The aforementioned approach applies equally to the provision of affordable housing. In particular **Policy DP2** specifically notes that the Council will resist alternative development of sites or parts of sites considered particularly suitable for affordable housing.
- 8.16 Again, therefore, unless there is an over-riding need for another land use (a need which would either be generated by the development or identified in a development plan document), development plan policy directs applicants to deliver housing.

Meeting Development-related Needs

- 8.17 The needs to which development usually gives rise include transport, education and healthcare services.
- 8.18 Camden Council notes at paragraph 1.1 of its March 2015 *Camden Community Infrastructure Levy Background Information Document* that:

“Community Infrastructure Levy (CIL) is a charge enabling Local Authorities to raise funds for infrastructure to meet the needs arising from new developments. The money raised will be used to fund local infrastructure such as schools, community facilities, transport improvements and many other forms of provision some of which are currently funded by monies paid by developers under Section 106 (S106) obligations.”

- 8.19 The subject development will be liable for the Community Infrastructure Levy and consequently the developer will pay a contribution which is based on what the Council has already assessed will have to be paid to address needs arising from development.
- 8.20 Whilst it is generally the local planning authority's duty to see that such monies are directed to the provision of necessary facilities and it is the Council's responsibility to deliver infrastructure under the CIL regime, there are provisions for other parties – including neighbourhood forums – to receive a share of CIL receipts to be put towards locally-identified priorities.
- 8.21 In this context, however, it is important to note that any requirement to provide uses for which CIL is levied in addition to a CIL payment would amount to the applicant 'double paying', therefore could not be justified and, indeed, would not be lawful under Regulation 123(2) of the Community Infrastructure Levy Regulations 2010 (as amended).
- 8.22 Even if the applicant elected to provide such facilities on a voluntary basis, this would fall foul of the policies mentioned earlier in this section where the Council notes that it will resist the development of non-residential uses on sites that are particularly suitable for residential use (including affordable housing).

The Interaction Between Affordable Housing Provision and Other Land Uses

- 8.23 Furthermore, as well as using space that would result in a decrease in the amount of residential units that could be provided, there would be a financial cost to provide non-residential land uses such as education and community use.
- 8.24 This would then negatively impact any surplus that would otherwise be used to secure affordable housing provision.
- 8.25 In the context of policy – and particularly so if there is not a sound policy justification for a non-residential land use – it could then be concluded that the development would not be delivering the maximum reasonable amount of affordable housing and therefore that the proposal fell foul of planning policies seeking such.

The Applicants' Affordable Housing Offer

- 8.26 It is the applicants' intention to provide the maximum reasonable amount of affordable housing in this development in accordance with Camden's **Policy DP3** and London Plan **Policy 3.12**.
- 8.27 The precise figure will depend on the size of the units (in terms of the number of bedrooms per unit) and the tenure. This is discussed in the **Affordable Housing Statement** which has

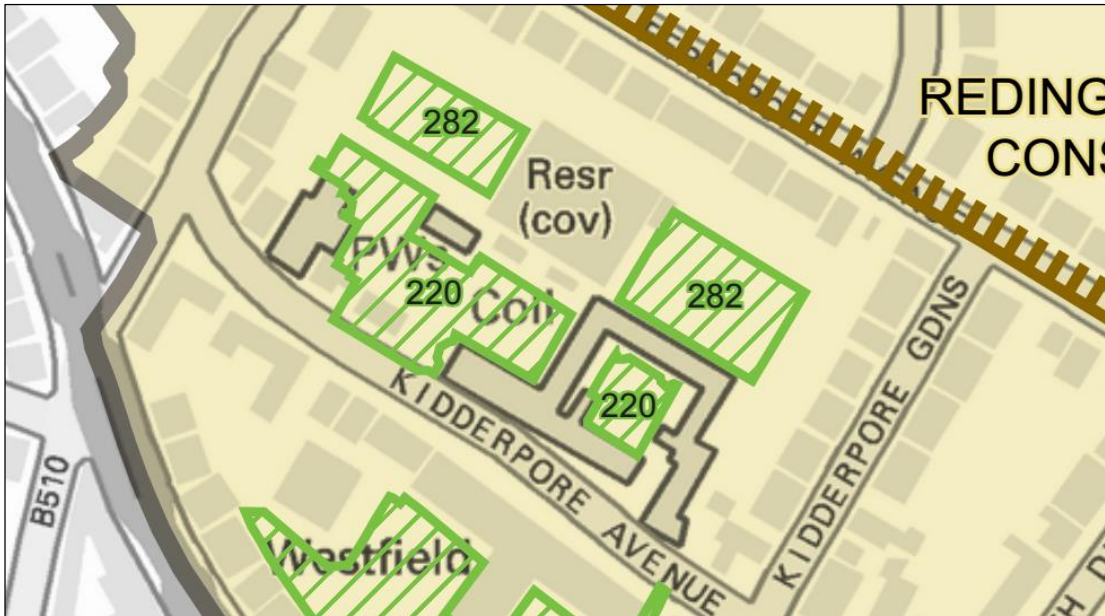
been prepared by Quod and which is submitted in support of these applications having regard to the relevant development plan policies, in particular **Policy DP2** (*Making full use of Camden's capacity for housing*); **Policy DP3** (*Contributions to the supply of affordable housing*); London Plan **Policy 3.8** (*Housing Choice*); London Plan **Policy 3.9** (*Mixed and Balanced Communities*); and London Plan **Policy 3.12** (*Negotiating Affordable Housing on Individual Private Residential and Mixed-use Schemes*).

- 8.28 Quod's Statement has also been prepared having regard to *Camden Planning Guidance 2 – Housing* (September 2013) and *Camden Planning Guidance 8 – Planning Obligations* (February 2015) and the draft revision to that document which was approved for consultation in March 2015.
- 8.29 The amount, tenure, mix, size and location of affordable housing will be secured by way of Section 106 Agreement should the Council resolve to grant planning permission and listed building consent.

9.0 ASSESSMENT – OPEN SPACE

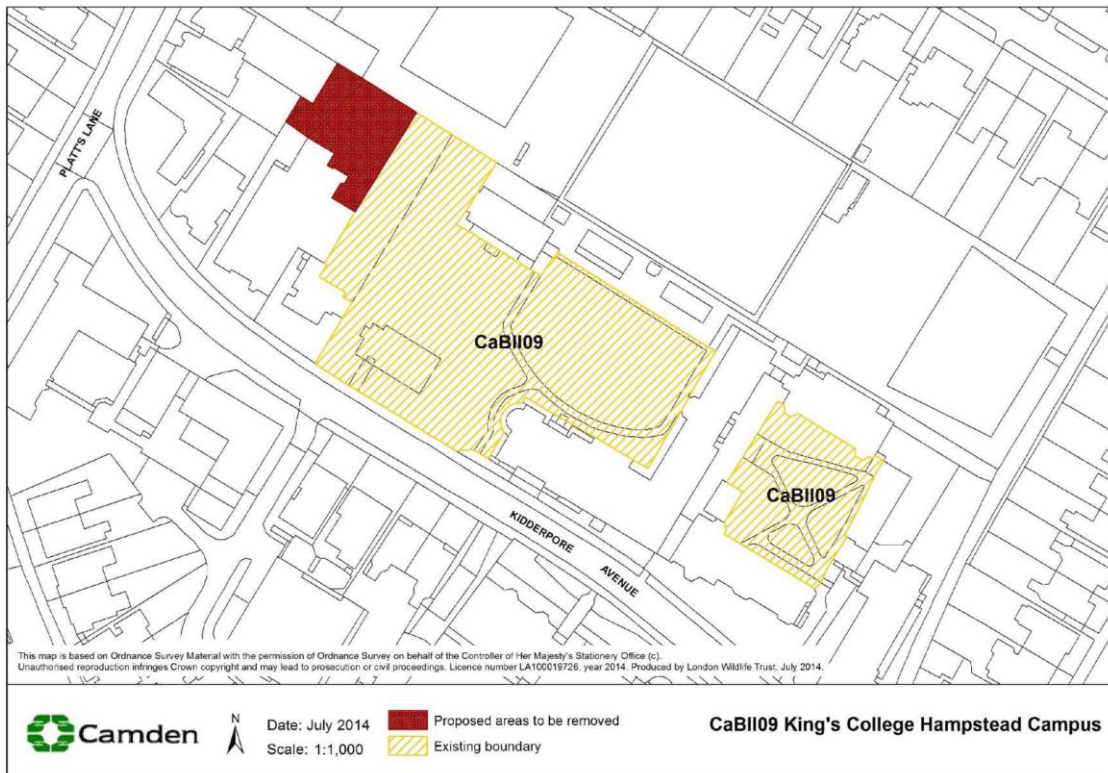
9.1 Some of the additional residential development on the site will take place on land identified as Private Open Space in the current development plan. That area, the extent of which shown on the map which is reproduced below (**Figure 9.1**) for ease of reference, corresponds with the extent of the SINC (**Figure 9.2**).

Figure 9.1 – Extract from Camden’s Planning Policies Map (2014)



Source – London Borough of Camden.

Figure 9.2 – Extent of SINC (from the Draft Local Plan, February 2015 Version)



Source – London Borough of Camden.

- 9.2 The extent of the SINC is currently under consideration as part of the local plan review; it is proposed that the area shaded red on **Figure 9.2** be removed from the designation. On behalf of the applicants, Montagu Evans has made representations relating to the extent of the SINC, not least because the SINC includes the Queen Mother's Hall building and associated hardstanding which we consider should not be part of this nature-based design.
- 9.3 The application proposals include development of some of the designated open space. This comprises:
- some of the townhouse floorspace which is proposed towards the north-eastern side of the site (the extant planning permission for student accommodation is also on the designated area);
 - the additional footprint of the replacement building for the Queen Mother's Hall; and
 - the 'pavilion' houses which are proposed on land between The Chapel and the replacement for the Queen Mother's Hall.
- 9.4 Given that this land is designated open space for ecological reasons, a **Preliminary Ecological Appraisal** has been prepared by The Ecology Consultancy to look at the effect that development could have on the natural environment.
- 9.5 This document explains that an assessment was undertaken of potential on-site habitats, specifically of buildings, hard standing, introduced shrub, amenity grassland, semi-natural broadleaved woodland, scattered trees, scrub and tall ruderal vegetation.
- 9.6 The Appraisal notes that features with potential to support roosting bats were recorded on-site. It says that the woodland, scrub, introduced shrub and mature and semi-mature trees on-site had moderate potential to support common nesting bird species, including house sparrow. Otherwise, it was concluded that no other species were likely to be supported on the site at the present time.
- 9.7 The Ecology Consultancy considers, however, that there is potential to improve the ecological value of this site, and its contribution to ecological diversity in the wider area, in a number of ways. These include:
- the removal of non-native and / or invasive species;
 - the provision of additional bird nesting and bat roosting opportunities;
 - habitat enhancements, for example the creation of 'bug hotels';
 - vegetation planting schemes of value to / which attract wildlife; and
 - a carefully-specified and controlled artificial lighting scheme which will be of particular benefit to nocturnal species including bats.
- 9.8 All of these measures can be secured by way of planning condition, including a detailed landscaping and tree planting scheme.

- 9.9 In addition, Mount Anvil would be happy for the currently undesignated open space on the site to be designated in the future and has also noted that it is willing to make the open space in the completed development accessible to the wider community.
- 9.10 As we noted in **Section 6.0** of this Statement, the policy which protects the open space on this site is **Policy CS15** (*Protecting and improving our parks and open spaces and encouraging biodiversity*). That sets out a number of provisions, including the Council's aim to protect open space and site of nature conservation and biodiversity value, its aim to protect trees and vegetation, and its expectation that new or enhanced habitat will be provided. The London Plan also seeks to protect open space (**Policy 7.18**).
- 9.11 Whilst the development proposals will result in a reduction in the amount of currently-designated open space on the site, it will offer the opportunity to secure landscaping, arboricultural and habitat enhancements, including through the inclusion of green roofs on the 'pavilion' houses, that will have the potential to be of overall benefit to the biodiversity of the site and the local area. Coupled with enhancements to non-designated parts of the site, the opportunity will also exist once the development has been completed to designate remaining parts of the site as open space which would result in a net gain in designated area when compared with the situation today.
- 9.12 The proposed development also offers the opportunity to secure public access to open space, a wider planning benefit. Such benefits can be secured by way of a Section 106 Agreement.
- 9.13 On that basis, we consider that the proposed development addresses the intentions of **Policy CS15** of Camden's Core Strategy and **Policy 7.18** and **Policy 7.19** of the London Plan.
- 9.14 Furthermore, the wider contribution that development such as the townhouses and the pavilions will make to the overall viability of the development should not be ignored, not least in terms of the positive effect on affordable housing provision, a consideration to be weighed in the wider planning balance when determining these applications.

10.0 OTHER CONSIDERATIONS

10.1 In this section we examine the other principal planning policy considerations to which the proposed development gives rise.

Heritage

10.2 As already discussed in this Statement, the site contains designated heritage assets in the form of five Grade II listed buildings. The site is located in the Redington and Frognal Conservation Area.

10.3 Kidderpore Hall, the original residence for which the pleasure gardens were laid out, was completed in 1843 and is a stuccoed villa in a Greek Revival style. Following the purchase and occupation of Kidderpore Hall and the wider site by Westfield in 1889, further development was initiated.

10.4 Individually, and as a group, the listed buildings retain architectural, communal and aesthetic value for their architectural quality and historic associations. A full statement of significance for the listed buildings is set out in the **Heritage Statement** that has been submitted with these applications and which has been prepared having regard to Historic England's advice in GPA2 (*Managing Significance in Decision-Taking in the Historic Environment*; 27 March 2015).

10.5 Some unlisted buildings on the site – Lord Cameron Hall, Rosalind Franklin, and Queen Mother's Hall – are identified in the Conservation Area Statement as buildings which make a positive contribution to the Conservation Area. Historic building consultants at Montagu Evans have assessed the contribution that is made by these buildings to the Conservation Area as limited. Queen Mother's Hall is of 1980s construction and its scale and detailing are at odds with the prevailing architectural style in the Conservation Area.

10.6 Lord Cameron Hall, built in 1935, is a modest 1930s institutional building of no real refinement. Pevsner refers to this (under its former name of Orchard Wing I) being of 'less interest' and we agree with this assessment. The replacement of these buildings with new buildings of high-quality design and materials would improve the character and appearance of the Conservation Area consistent with the aims of London Plan **Policy 7.8** (*Archaeology and Heritage Assets*), Camden **Policy CS14** (*Promoting High-quality Places and Conserving our Heritage*) and **Policy DP25** (*Conserving Camden's heritage*) insofar as that policy relates to conservation areas.

Proposals and Impact

10.7 A full assessment of the impact of the proposals on the heritage assets on the site is set out in the **Heritage Statement** that has been prepared in support of these applications. A summary of the main points is set out here.

10.8 All of the listed buildings are to be retained on the site. Three unlisted buildings (Lord Cameron Hall, Rosalind Franklin and Queen Mother's Hall) will be demolished and replaced with new buildings of high-quality design and materials which draw references from the architecture of existing buildings within the Conservation Area, consistent with the aims of London Plan **Policy 7.9** (*Heritage-led Regeneration*) and other national and local planning policies that have already been mentioned.

- 10.9 The proposals for residential use in both the new build and existing buildings (including the listed buildings) have been developed by architects Scott Brownrigg who regularly work on sensitive sites which include historic buildings. The proposals will preserve those features of the buildings which contribute to the significance of the listed buildings whilst introducing elements of new architecture which will enhance their heritage value and bring them back into appropriate uses which are consistent with their conservation.
- 10.10 The replacement of the buildings which are identified as making a positive contribution to the Conservation Area, namely Queen Mother's Hall, Lord Cameron and Rosalind Franklin, will not have a harmful impact upon the character or appearance of the Conservation Area. The contribution made by these buildings to the Conservation Area has been assessed as limited as a result of their low architectural quality and lack of distinguishing features. The quality of the architecture proposed for the replacement buildings will, in fact, enhance the Conservation Area.
- 10.11 The new proposals will necessarily result in a change within the setting of the listed buildings on the site. We have assessed this having regard to Historic England's advice in GPA3 (*The Setting of Heritage Assets*; 25 March 2015) and consider that this will be a positive change in this sensitive location, and a change which respects the significance of the designated heritage assets. The scale, the orientation, detailed design and the integration of the buildings into the grounds and the proposed landscape works ensure that the proposals take the opportunity to preserve and, where possible, enhance the setting of the listed buildings through the introduction of high-quality architecture which is an appropriate response to its surroundings.
- 10.12 Overall the proposals will be beneficial to the significance of the designated heritage assets on the site and the on the wider Conservation Area (which is also a designated heritage asset).
- 10.13 As indicated above, the acceptability of replacing buildings that make a positive contribution to a conservation area at least in part depends on the quality of design of the replacement buildings, a matter that we will now consider.

Design

Generally

- 10.14 The **Design and Access Statement** explains in detail the evolution of the proposed development and how comments from a number of parties, including from Officers of the Council and local people, have been assimilated. It sets out the detailed analysis of the site and the wider area that has influenced the scheme as advocated by London Plan **Policy 7.4** (*Local Character*).
- 10.15 We consider that the resultant design high-quality design not only satisfies Camden's general policy relating to such (**Policy DP24; Securing High-quality Design**), the principles described in Camden Planning Guidance 1 and London Plan **Policy 7.6** (*Architecture*), but that it also justifies the replacement of the positive contributors to the Conservation Area, discussed above.

- 10.16 The **Design and Access Statement** also explains how the development has been designed so as to reduce the risk of crime in accordance with Camden **Policy CS17** (*Making Camden a Safer Place*) and London Plan **Policy 7.3** (*Designing Out Crime*).
- 10.17 It and the associated **Access Statement** describe how the homes and the wider development have been designed to achieve, within the constraints presented by the site's heritage assets, an inclusive, high-quality environment in accordance with London Plan **Policy 7.1** (*Lifetime Neighbourhoods*), **Policy 7.2** (*An Inclusive Environment*), **Policy 7.5** (*Public Realm*), Camden, **Policy DP29** (*Improving Access*), and the principles set out in *Accessible London: Achieving an Inclusive Environment* (April 2004). The provision of lifetime homes, parking for wheelchair users and any other necessary accessibility measures will be secured by way of a Section 106 Agreement.
- 10.18 In addition, proposals for hard and soft landscaping have been formulated to address London Plan **Policy 5.10** (*Urban Greening*) and **Policy 5.11** (*Green Roofs and Development Site Environs*).
- Residential including Residential Amenity**
- 10.19 Great attention has also been paid to the creation of a very high-quality residential environment by Mount Anvil, a company that has been awarded the coveted 'Developer of the Year' prize at the Property Week RESI Awards for the past three years.
- 10.20 The **Design and Access Statement** explains how the architects have paid close attention to the physical context of the site and local character in order to create a place that is appropriate to the locality both in terms of new buildings and open space. Each individual dwelling has been designed having regard to the Mayor's space standards and an appropriate number of 'lifetime homes' have been included. Thus we consider that the proposed development complies with: London Plan **Policy 3.5** (*Quality and Design of Housing Developments*); the relevant parts of **Policy 3.8** (*Housing Choice*); the Mayor's Housing SPG (November 2012) and the draft revised Housing SPG (May 2015); Camden **Policy DP6** (*Lifetime Homes and Wheelchair Housing*); and the relevant parts of *Camden Planning Guidance 2 – Housing* (September 2013).
- 10.21 The **Design and Access Statement** also illustrates how the scheme has been designed to ensure privacy and to minimise overlooking between dwellings and to ensure satisfactory daylight and sunlight to dwellings. Odours and fumes, and noise and vibration, should not be issues in the completed development and, in any event, attenuation measures will be included to address such issues and these can be controlled by way of planning condition.
- 10.22 The **Design and Access Statement** explains that facilities for the storage, recycling and disposal of waste will be provided on the site, as will facilities for bicycle storage. It also describes the amenity space that will be provided on the site, including private amenity space and communal amenity space which will also be accessible to the wider community.
- 10.23 Thus we consider that Camden **Policy DP26** (*Managing the Impact of Development on Occupiers and Neighbours*) and the relevant parts of *Camden Planning Guidance 2 – Amenity* (2011) have been addressed.

- 10.24 The amenity of existing residential units can also be affected by the implementation of development. We expect that the Council will attach standard planning conditions to control hours of working and to require a Construction Logistics Plan that will deal with, amongst other things, noise and dust resulting from development and the routing of construction traffic.

Transport

- 10.25 Throughout the pre-application consultation process, transport – and in particular car parking provision – has been raised as a key consideration by local people. Some people noted that they wanted to see a car-free development and others said that they wanted to see ample car parking provision so that pressure for on-street car parking in the local area is not increased.

Assessment of Effects

- 10.26 The transport demands of the proposed development, and the amount of parking that will be needed, has been examined in the **Transport Assessment** which accompanies the planning application and which has been prepared to address **Policy 6.3** (*Assessing Effects of Development on Transport Capacity*) of the London Plan and Camden's **Policy DP16** (*The Transport Implications of Development*). Regard has also been paid to Camden's Planning Guidance on Transport.

- 10.27 The scope of the Assessment was agreed in advance with Transport Officers of the London Borough of Camden and following analysis of the highways and public transport networks, it was concluded that the effects of the proposed development will be acceptable.

Car Parking Provision

- 10.28 The **Transport Assessment** explains the policy rationale behind the proposed parking provision which, at 0.6 spaces per dwelling, takes a restrained approach similar to that approved by the Council in relation to planning application 2013/0685/P on the southern side of Kidderpore Avenue. On the basis of the justification in the Transport Assessment, we consider that the proposed development complies with London Plan **Policy 6.13** (*Parking*) and Camden's **Policy DP18** (*Parking Standards and Limiting the Availability of Car Parking*).
- 10.29 In addition, close regard has been paid to addressing the provisions of **Policy DP19** (*Managing the Impact of Parking*) in designing the scheme, particularly given the historic environment context. That policy says that the Council will require off-street parking to:

- preserve a building's setting and the character of the surrounding area;
- preserve any means of enclosure, trees or other features of a forecourt or garden that make a significant contribution to the visual appearance of the area; and
- provide adequate soft landscaping, permeable surfaces, boundary treatment and other treatments to offset adverse visual impacts and increases in surface run-off.

- 10.30 We consider that the proposed basement solution allows this policy to be addressed very successfully.

Servicing

- 10.31 The Transport Assessment also describes the proposed servicing arrangements, in particular the off-street servicing area close to Lord Cameron / Dudin Brown. We expect that the

Council will require a servicing management plan and that this would be secured by way of a Section 106 Agreement.

Encouraging Sustainable Transport

- 10.32 The **Transport Assessment** (TA) also explains how new residents will be encouraged to adopt more sustainable travel patterns by way of a **Residential Travel Plan**, a draft of which is appended to the TA. This, along with some restraint in the provision of car parking and policy-compliant cycle parking provision, will address London Plan **Policy 6.9** (*Cycling*) and **Policy 6.10** (*Walking*), Camden's Core Strategy **Policy CS11** (*Promoting Sustainable and Efficient Travel*) and Camden's **Policy DP17** (*Walking, Cycling and Public Transport*). Restraint measures, such as restrictions on car parking permits, and the residential travel plan will be secured by way of a Section 106 Agreement.

Safety

- 10.33 Safety along Kidderpore Avenue was raised as an issue by a small number of people during Mount Anvil's public consultation exercises, particularly in terms of cars leaving or accessing the site and given that there is a school on Kidderpore Avenue. As is explained in the **Design and Access Statement**, full regard has been paid to this consideration in designing the car park access / egress and thus we consider that the proposed development accords with **Policy DP21** (*Development Connecting to the Highway Network*). The creation of this new access to the public highway at the developer's expense, and the detailed design of this new access, will be secured by way of a Section 106 Agreement.

Construction Traffic

- 10.34 Although a temporary effect of development, concerns about disruption from construction traffic were a regular theme raised during public consultation. The **Transport Assessment** explains that Mount Anvil – who will also be the main contractor – will prepare a Construction Logistics Plan which will include measures to manage construction traffic on Kidderpore Avenue and adjoining streets. We expect that such a document will be required by way of a planning condition or Section 106 Agreement and that it will be formulated in consultation with Officers of the London Borough of Camden, Transport for London and members of the local community.

Basement Excavation

- 10.35 The Construction Logistics Plan will, amongst other things, consider movements resulting from the removal of spoil associated with the excavation of the basement parking area.
- 10.36 To address **Policy DP27** (*Basements and Lightwells*) which, when appropriate, seeks an assessment of a scheme's impact on drainage, flooding, groundwater conditions and structural stability a **Basement Impact Assessment** has been prepared, also having regard to *Camden Planning Guidance 4 – Basements and Lightwells* (September 2013).
- 10.37 As is explained in the Assessment, the proposed basement is not expected to have an adverse impact in terms of drainage, flooding, groundwater conditions or structural stability, matters that have been very carefully examined given the heritage assets on and close to the site. Thus, we consider the aforementioned policy provisions to have been satisfied.

Noise

- 10.38 Noise arising from the implementation of development, as well as noise arising from completed development, is an additional consideration set out in planning policy.
- 10.39 As already noted above we expect that the Council will control hours of construction by way of a planning condition.
- 10.40 Given that a residential development is proposed, this will be wholly compatible with the residential character of the local area. Whilst the proposals include plant (such as extraction equipment and so on), we expect that the Council will require details of noise attenuation by way of a planning condition and that ongoing controls will be placed on the operation of this equipment in the interests of residential amenity.
- 10.41 Thus we consider that the proposed development will be acceptable in the context of London Plan **Policy 7.15** (*Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes*), Camden **Policy DP28** (*Noise and Vibration*) and the relevant parts of *Camden Planning Guidance 2 – Amenity* (2011).

Air Quality

- 10.42 Given that the whole of the London Borough of Camden has been declared an Air Quality Management Area due to exceedances of the annual and hourly mean nitrogen dioxide objectives and the daily mean PM₁₀ objective, the air quality effects associated with the proposed development have been assessed by Peter Brett Associates and an **Air Quality Assessment** has been submitted in support of the planning application.
- 10.43 The construction works have the potential to create dust. During construction it is recommended that a package of mitigation measures is put in place to minimise the risk of elevated PM₁₀ concentrations and dust nuisance in the surrounding area.
- 10.44 Annual mean NO₂ concentrations are not predicted to exceed the annual mean objective at any of the future receptor locations on the ground floor level of the proposed development. There are no exceedances of the PM₁₀ objectives at any of the future receptor locations.
- 10.45 The buildings emissions for the development comply with the aims in the Mayor of London's SPG for 'air quality neutral' development.
- 10.46 Overall, the air quality effects for the proposed development on future residents are considered to be insignificant. Thus, we consider that the proposed development complies with London Plan **Policy 7.14** (*Improving Air Quality*) and Camden's **Policy DP32** (*Air Quality and Camden's Clear Zone*).

Energy and Sustainability

- 10.47 An **Energy and Sustainability Statement** has been prepared to explain how a 35% improvement in regulated CO₂ over Part L of the Building Regulations 2013 will be achieved and thus how the proposal will satisfy **Policy 5.2** (*Minimising Carbon Dioxide Emissions*), **Policy 5.3** (*Sustainable Design and Construction*), **Policy 5.7** (*Renewable Energy*) and **Policy**

5.9 (*Overheating and Cooling*) of the London Plan and the Mayor's *Sustainable Design and Construction* SPG (April 2014). The targets will be met by a combination of passive design measures, low U-values, low air permeability, a high-efficiency communal gas heating system, and photovoltaic panels, measures that will also address Camden's **Policy CS13** (*Tackling Climate Change through Promoting Higher Environmental Standards*), **Policy DP22** (*Promoting Sustainable Design and Construction*), and the relevant provisions of *Camden Planning Guidance 3 – Sustainability* (2013). We expect that such measures will be secured by way of a Section 106 Agreement.

- 10.48 The feasibility of a Combined Heat and Power (CHP) system has been evaluated and whilst the development is not of a sufficient size to warrant one, communal heating and cooling will be provided in response to the provisions of London Plan **Policy 5.6** (*Decentralised Energy in Development Proposals*).

Flood Risk & Water Resources

- 10.49 A **Flood Risk Assessment** has been prepared by WSP | Parsons Brinckerhoff. This explains that the site is located in Flood Zone 1 where residential uses are appropriate and where an Exception Test would not be required, as advised by the NPPF and NPPG.
- 10.50 In addition, it is explained in the Flood Risk Assessment that the potential for flood risk from the full range of sources (ie rivers and sea, surface water, groundwater, sewers, artificial) is considered to be low or negligible for this site.
- 10.51 In case of an incident occurring, there will be adequate waterproofing and unimpeded stair access from the basement car park to reduce any risk to people, even though the risk of ground water flooding or surface water flooding impacting on the basement is considered to be low.
- 10.52 Other sources of flooding have been considered and the sustainable management of surface water run-off on and from the site has been identified as the key consideration for the development. The proposed surface water drainage strategy developed by Tully De'Ath in consultation with the relevant approving bodies will ensure that surface water is appropriately managed on site and that there will be no detrimental impact off site.
- 10.53 On the basis of this we consider that the proposed development accords with London Plan **Policy 5.12** (*Flood Risk Management*), **Policy 5.13** (*Sustainable Drainage*) and Camden's **Policy DP23** (*Water*).
- 10.54 The proposed development will be connected to the drinking water and sewerage networks. We expect that the local planning authority will attach standard planning conditions requiring it to be demonstrated that there is sufficient capacity in these and that measures will be put in place to minimise water usage. This will satisfy London Plan **Policy 5.14** (*Water Quality and Waste Water Infrastructure*), **Policy 5.15** (*Water Use and Supplies*) and the relevant parts of Camden's **Policy DP23** (*Water*).

Waste

- 10.55 The development will incorporate space for the storage of recyclable and non-recyclable waste in accordance with the aims of London Plan **Policy 5.16** (*Waste Net Self-sufficiency*) and Camden's **Policy CS18** (*Dealing with our Waste and Encouraging Recycling*).

11.0 CONCLUSIONS

- 11.1 This Planning Statement has been prepared in relation to an application for Planning Permission and applications for Listed Building Consent on land at Kidderpore Avenue in Hampstead. The applications seek permission for use of the site for residential purposes and propose a total of 156 homes in a carefully-considered conservation-led scheme. No non-residential uses are proposed.
- 11.2 There are five listed buildings on the site and part of the site is a Site of Importance for Nature Conservation. The site is in the Redington and Froggnal Conservation Area.
- 11.3 The lawful use of the site is student accommodation. An equivalent amount of student accommodation has been re-provided elsewhere in accordance with the requirements of Camden's **Policy DP9**. That policy also requires the provision of an equivalent amount of Class C3 residential floorspace to the amount of student accommodation that was on the site. These applications will satisfy that requirement.
- 11.4 This proposal will, in fact, lead to an increase in residential floorspace on the site. This is consistent with both London Plan and Camden policy where residential is the priority land use. The maximum reasonable amount of affordable housing will be provided.
- 11.5 Save for facilities ancillary to the residential use of the site, no non-residential floorspace will be provided. This is because there is no requirement to do so in development plan policy (for example in terms of a site allocation) and because the proposed development does not give rise to the need to provide other land uses on the site.
- 11.6 Whilst the proposal will result in a small decrease in the amount of designated open space on the site, there will be enhancements to its value as a habitat. The site will also be made accessible to the public which we also see as a significant benefit.
- 11.7 Generally, very careful attention has been given to the creation of a high-quality landscape scheme that will be appropriate to the area and which will complement the historic buildings on the site. Similarly, great care has been taken to ensure that the conversion and re-use of the site's listed buildings will preserve those features of the buildings which contribute to their significance whilst introducing elements of new architecture which will enhance their heritage value and bring them back into appropriate uses which are consistent with their conservation. Similar principles have been applied to the unlisted buildings that will be retained.
- 11.8 The new-build elements on the site have been designed to take cues from buildings on the site and in the wider Conservation Area. Design elements from the typical Arts and Crafts-style buildings have been combined with contemporary language and a modern but restrained palette of materials to create a 'family' of new-build elements on the site.
- 11.9 Car parking provision – at 0.6 spaces per unit – reflects the site's PTAL of 2 whilst recognising the desirability of restraint to encourage sustainable travel. Car parking, along with policy-compliant cycle parking, will be provided in a purpose-built basement to avoid the impact that would be caused by providing such facilities at street level. As well as a restrained

approach to car parking, Mount Anvil will implement a travel plan to encourage residents to adopt sustainable travel patterns.

- 11.10 We have explained in this Planning Statement how a wide range of matters have been examined (for example air quality and flood risk) and that the proposal will not give rise to such issues. Other development control considerations – for example noise, utility capacity and the effects of construction – will be controlled by way of planning conditions.
- 11.11 Finally, the delivery of an environmentally-sustainable development has been at the forefront of Mount Anvil's design process and the proposal will achieve a 35% improvement in regulated CO₂ over Part L of the Building Regulations 2013.
- 11.12 In summary, whilst the proposed development will result in a small decrease in the amount of designated open space on the site and will involve the replacement of buildings which are considered to make a positive contribution to the Conservation Area, there are material considerations of great weight that weigh in favour of the grant of Planning Permission and Listed Building Consent.
- 11.13 One of the most important considerations is the contribution that the proposal will make to the borough's housing supply, including the borough's stock of affordable housing.
- 11.14 Another very important consideration is that the development will secure the future of the five listed buildings on the site by preserving those features of the buildings which contribute to their significance whilst introducing elements of new architecture which will enhance their heritage value and bring them back into appropriate uses which are consistent with their conservation.
- 11.15 Furthermore, we consider that this carefully-considered scheme will enhance the Redington and Frogna Conservation Area which is also a designated heritage asset.
- 11.16 As has been explained in this Statement, the proposed development will comply with the full range of other applicable development plan policies which have been addressed in the scheme's design or which will be addressed by way of planning conditions.
- 11.17 On that basis we consider that the proposed development represents 'sustainable development' within the meaning set out in the National Planning Policy Framework, and we also consider that the overall planning balance weighs in favour of the grant of Planning Permission and Listed Building Consent when the proposals are assessed against the policies of the development plan, taken as a whole.
- 11.18 As such, we commend these applications to the London Borough of Camden and to the Mayor of London.