

THE ZABLUDOWICZ **ART TRUST**

176 PRINCE OF WALES ROAD NW5 3PT

PLANNING STATEMENT

21 DECEMBER 2016

CHARTERED SURVEYORS

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1.0 EXECUTIVE SUMMARY

1.1 This Planning Statement has been prepared by Montagu Evans to accompany an application for planning permission and listed building consent for development at 176 Prince of Wales Road ("the Site") to create additional gallery floorspace for use by the Zabludowicz Collection. The description of development is as follows:

"Works to improve the existing gallery facilities, including the erection of an extension to the existing building (including partial demolition and rebuild of the rear part), excavation of a basement level below part of the existing building, localised demolition and other associated external and internal works".

- 1.2 The purpose of this Statement is to provide a planning policy analysis of the proposed scheme in light of national, regional and local planning guidance.
- 1.3 The proposed development ("the Scheme") would involve the following changes to the Site:
 - Internal alterations, including the reconfiguration of the internal circulation core in the rear buildings;
 - Erection of a single storey extension above the middle and rear buildings;
 - Excavation of a new basement level beneath the middle and rear buildings;
 and
 - Other associated works.
- 1.4 The Site comprises 0.13 ha (0.32 acres) and is located within the administrative area of the London Borough of Camden (LBC). The existing building ("the Building") is Grade II listed, but is not located within, or in close proximity to, a conservation area.
- 1.5 Section 3 of this Statement provides background information on site location and planning history. The description of development and the proposals are set out in in Section 4, with relevant planning policy outlined in Section 5. An assessment of the proposals in relation to the Development Plan is set out in Section 6, and a summary and conclusions are contained within Section 7.
- 1.6 The Scheme has been developed following detailed pre-application discussions with LBC. A copy of the formal written pre-application feedback can be found at Appendix 1 of this Statement.
- 1.7 The Scheme would result in the provision of an additional 880 sqm (GIA) (73% increase) of gallery floorspace and would provide enhanced educational and catering facilities, to meet the operational needs of the Zabludowicz Collection.

- 1.8 The Scheme would retain and enhance an existing community facility, thereby broadening the range of exhibitions, events and classes that the gallery could facilitate, and enhancing the functionality of the gallery as a community facility.
- 1.9 The Scheme has been developed to respond sensitively to the listed building and neighbouring buildings. This has been achieved through incorporating high design standards and ensuring a high quality environment for future occupants and visitors.
- 1.10 It has been identified that LBC may identify "less than substantial harm" to the listed building, caused by the removal of historic fabric. Notwithstanding, it is considered that the public benefits of the proposed development outweigh any "less than substantial harm" associated with the removal of historic fabric from the listed building.
- 1.11 A suite of technical reports has been prepared, which demonstrate compliance with the relevant planning policy regarding issues such as noise, daylight and sunlight, energy and sustainability, structural matters and servicing.
- 1.12 In summary, the conclusions of this Statement demonstrate that the Scheme has been formulated in accordance with the relevant planning policy framework at all tiers and would make an important contribution through the enhancement of an existing community facility within the Borough. The proposals are therefore considered to be both appropriate and beneficial.
- 1.13 We therefore ask that this Application for planning permission and listed building consent is granted.

2.0 INTRODUCTION

- 2.1 This Statement has been prepared on behalf of The Zabludowicz Art Trust ("the Applicant") in respect of an application for planning permission and listed building consent ("collectively known as the Application") for development ("the Scheme") at 176 Prince of Wales Road, NW5 3PT ("the Site).
- 2.2 This Statement forms part of this Application for:

"Works to improve the existing gallery facilities, including the erection of an extension to the existing building (including partial demolition and rebuild of the rear part), excavation of a basement level below part of the existing building, localised demolition and other associated external and internal works".

- 2.3 The purpose of this Statement is to consider the Scheme in the context of national, strategic and development plan policy, with particular regard to:
 - The appropriateness of the Scheme in this location; and
 - The impact of the Scheme upon the character and appearance of the grade II listed building.
- 2.4 This Statement is informed by the following documents, which have been prepared and submitted as part of this Application:
 - Plans and Drawings, prepared by Farshid Moussavi Architecture (November 2016):
 - Design and Access Statement, prepared by Farshid Moussavi Architecture (November 2016);
 - Heritage Statement, prepared by Montagu Evans (December 2016);
 - Basement Impact Assessment and Structural Report, prepared by Parmabrook (November 2016);
 - Daylight and Sunlight Assessment, prepared by Point 2 Surveyors (November 2016);
 - Environmental Noise Assessment, prepared by Noico (December 2016);
 - Thermal Comfort Analysis, prepared by Eight Associates (December 2016);
 - M&E Report, prepared by E&M Tecnica (December 2016);
 - Energy Assessment, prepared by Eight Associates (December 2016);
 - BREEAM Report, prepared by Eight Associates (December 2016);
 - Statement of Need, prepared by The Zabludowicz Collection (November 2016);
 - Service Management Plan, prepared by Mayer Brown (December 2016); and
 - Construction Management Plan, prepared by IDL (November 2016).
- 2.5 The Scheme has been developed following detailed pre-application discussions with planning and design officers at the London Borough of Camden (LBC). Further

details of pre-application discussions with officers are provided within **Appendix 1** of this Statement.

3.0 SITE DESCRIPTION

- 3.1 The Site comprises an area of 0.13 ha (0.32 acres) and is located in the administrative area of the London Borough of Camden (LBC). A location plan showing the Site in the context of the surrounding area is included at **Appendix 2**.
- 3.2 The Site comprises a two storey Grade II listed former Methodist Church ("the Building), which was first listed on 14 May 1974. The Site is currently in use as an art gallery and exhibition space for the Zabludowicz Collection, with a total floorspace of 1,203 sqm (GIA).
- 3.3 The Site is located on the northern side of Prince of Wales Road. To the south, the Site is bound by Prince of Wales Road and to the east by a four storey block of flats (Westwell and Wingham). To the west, a small access road separates the Site from the Penshurst Estate. To the north of the Site is an area of communal open space for the surrounding residential flats and a car parking ramp which leads to underground car parking.
- 3.4 The area surrounding the Site comprises a mix of uses, including a significant amount of residential accommodation. The Haverstock School is located directly to the south and the Saint Silas the Martyr, Kentish Town and Hampstead Seventh Day Adventist Churches are all in close proximity to the Site. A range of commercial and retail uses are located along Chalk Farm Road to the south and Haverstock Hill to the west.
- 3.5 The Site has a Public Transport Accessibility Level (PTAL) of 4 (good). The nearest underground station is Chalk Farm, approximately 220m to the south of the Site, from which the northern line operates. The No.393 bus service operates along Prince of Wales Road and a number of other services are available from bus stops along Haverstock Hill, Adelaide Road, Chalk Farm Road and Ferdinand Street, in close proximity to the Site.
- 3.6 Whilst the existing building is Grade II listed, it is not located within a conservation area. The Site is located within the vicinity of a number of other statutorily listed buildings, as shown in **Table 1** below.

Table 1: Listed buildings within the vicinity of the Site

Property	Listing
Church of St Silas the Martyr	*
131-149 Prince of Wales Road	II
The Fiddlers Elbow Public House	II
Rhyl Primary School and Nursery	II
Load of Hay Tavern	II
1-6, 7, 8, 9, & 13-20 Eton Villas	II
2 & 3 Eton College Road	II

3.7 The Site is located within Flood Zone 1, which indicates a low annual probability (1 in 1,000) of flooding.

Planning History

- 3.8 A desk based planning search of LBC's online planning archive has been undertaken to provide an understanding of the previous applications in relation to the Site. A summary of the relevant planning history for the Site is provided below.
- 3.9 Planning permission and listed building consent were granted on 28 September 1987 for the erection of an extension at ground floor level to provide additional ancillary residential accommodation for a resident caretaker (8701367 and 8770219 respectively).
- 3.10 On 17 May 1993 listed building consent was granted for alterations to the side entrance door and associated internal alterations (9370095).
- 3.11 On 11 October 1993 planning permission and listed building consent were granted for the demolition of the single storey extension and the erection of a part 2, part 3 storey extension for educational use (9301292 and 9370210 respectively).
- 3.12 From a review of the approved plans, it does not appear that these consents were ever implemented.
- 3.13 Planning permission and listed building consent were granted on 18 July 2006 for a new disabled access ramp, new boundary railings, new column and landscape uplighters all in conjunction with the use of the building as an Art Gallery (Use Class D1) (2006/2387/P and 2006/2390/L respectively). The relevant conditions pursuant to this listed building consent have been discharged and we understand that this development has been implemented.

4.0 APPLICATION PROPOSALS

- 4.1 Since 2007, the Zabludowicz Collection has occupied the Site as a gallery and exhibition space for the presentation of contemporary art. Over the past decade however, the Collection's programme has expanded and requirements have progressed beyond the physical capacity of the current facilities. As such, the Collection is looking to increase the amount of exhibition space, improve the current catering and educational provisions, create additional storage space and introduce climate controlling equipment to deliver an enhanced gallery environment. Further details of the Applicant's operational needs are provided within the Statement of Need, prepared by the Zabludowicz Collection, which is submitted as part of this Application.
- 4.2 In accordance with the above, this Application therefore seeks the construction of a single storey rear extension, the excavation of a basement level below the existing rear and middle buildings and a series of internal and external alterations, to provide improvements to the existing gallery facilities.
- 4.3 The description of development for this Application is as follows:

"Works to improve the existing gallery facilities, including the erection of an extension to the existing building (including partial demolition and rebuild of the rear part), excavation of a basement level below part of the existing building, localised demolition and other associated external and internal works".

- 4.4 The Scheme details are shown in detail within the Farshid Moussavi Architecture drawings and Design and Access Statement, which form part of this Application.
- 4.5 The existing building comprises 1,203 sqm (Gross Internal Area (GIA)). The proposals would result in an increase in floorspace of 880 sqm (73% increase), to 2,083 sqm (GIA). A full breakdown of areas is included within the Design and Access Statement, however a summary is provided in **Table 2** below.

Table 2: Existing and Proposed Areas (GIA)

Level	Existing (sqm)	Proposed (sqm)	Difference (+/-) (sqm)
Basement	15	429	414
Ground	790	790	0
First	398	456	58
Second	0	408	408
Total	1203	2083	880

4.6 As outlined above, the need has arisen for climate controlling plant equipment to be installed, to facilitate the exhibition and storage of a wide range of art types. The

Scheme therefore include the introduction of plant rooms at basement and between the first and proposed second floor levels.

4.7 Given the listed status of this Building, the retention and enhancement of surviving historic features and fabric is integral to the design principle of the proposals. A detailed Heritage Statement is submitted as part of this Application which provides a full assessment of the proposals from a heritage perspective.

5.0 PLANNING POLICY CONTEXT

- 5.1 The Scheme has been designed in accordance with adopted and emerging planning policy at a national, regional and local level.
- 5.2 This section sets out the planning policy and other material considerations that are relevant in the determination of this planning application.

Statutory Framework

Planning and Compulsory Purchase Act 2004

5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

Planning (Listed Building and Conservation Areas Act) 1990

- 5.4 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides the legislation that is used to assess the impact of proposals on listed buildings.
- 5.5 Under Sections 16 (for listed building consent) and 66 (for planning permission when required) of the 1990 Act, when determining applications, the local planning authority or the Secretary of State:

"Shall have special regard to the desirability of preserving the building or its setting of any features of special architectural or historic interest which it possesses."

National Planning Policy Framework

- The National Planning Policy Framework ("the NPPF") was published on 27 March 2012 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government's approach to planning matters, and is a material consideration in the determination of planning applications.
- 5.7 The National Planning Practice Guidance (2014), ("the NPPG"), published 6 March 2014 (and subsequent amendments) is also a material consideration and should be read in conjunction with the Framework.
- 5.8 The key consideration in the determination of the planning application is the Development Plan with other material considerations being relevant as appropriate, including the guidance within the NPPF. The weight to be attributed to the policies identified in the Development Plan will depend upon the consistency they have with the NPPF.

5.9 Paragraph 14 of the NPPF directs planning authorities on how decisions should be made in these circumstances and states:

"For decision-taking this means:

- Approving development proposals that accord with the Development Plan without delay; and
- Where the development is absent, silent or relevant polices 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 in this Framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted."
- 5.10 The NPPF makes clear that planning applications should only be refused where any adverse impacts 'significantly and demonstrably' outweigh planning benefits that arise from the proposals.
- 5.11 As set out above, the threshold for a refusal must be an adverse impact that outweighs planning benefits to a significant and demonstrable degree in other words, the NPPF provides a very clear direction on the threshold of unacceptable impact. The NPPF is clear that any adverse impact must be considered in the context of countervailing planning benefits and as adverse impact that falls short of the 'significant' threshold is not sufficient grounds for refusal.
- 5.12 The presumption in favour of sustainable development, which is seen as the 'Golden Thread' that runs through the NPPF, indicates that where this test is met, applications should be approved without delay.

The Development Plan

- 5.13 The statutory Development Plan for the Site comprises:
 - The London Plan: The spatial development strategy for London consolidated with alterations since 2011 (March 2016);
 - London Borough of Camden Core Strategy (2010);
 - London Borough of Camden Development Policies (2010); and
 - Proposals Map (2010).

Emerging Planning Policy

5.14 LBC is in the process of preparing a new Local Plan for the Borough which, upon adoption, will replace the Core Strategy and Camden Development Policies as the basis for planning decisions.

5.15 On 24 June 2016, LBC submitted the Camden Local Plan (Submission Draft) to the Secretary of State for independent examination. Public hearings took place between 18 October and 25 October 2016. Due to the advanced stage in the preparation of the Local Plan, this document should be afforded some weight in the decision making process.

Supplementary Planning Documents

- 5.16 In addition to the statutory Development Plan, both LBC and the Greater London Authority (GLA) have published a number of Supplementary Planning Documents, which provide additional planning guidance.
- 5.17 The remainder of this document identifies the key issues relevant to the determination of the Application and considers these in the context of the policy guidance.

6.0 KEY PLANNING CONSIDERATIONS

This section considers the acceptability of the proposed development in the context of the national, regional and local planning policy.

Planning Designations

- 6.2 In accordance with the adopted Policies Map, the Site is not subject to any site specific policy designations.
- 6.3 176 Prince of Wales Road is a Grade II listed building, first listed on 14 May 1974. The Building is not located within a conservation area.
- 6.4 In accordance with the Environment Agency Flood Map for Planning, the Site is located within Flood Zone 1, which indicates that there is a low probability of flooding.

Principle of Development

6.5 Paragraph 17 of the National Planning Policy Framework ("the NPPF") sets out the core land use planning principles that underpin plan making and decision taking. The final of the twelve core principles states that planning should:

"Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs".

- Paragraph 70 of the NPPF identifies the need to plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities. Furthermore, it is recognised that planning should aim to guard against the unnecessary loss of valued facilities and services.
- 6.7 Policy 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) of the London Plan supports the "continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors". The Policy further states that Boroughs should seek to enhance and protect creative work and performance spaces and related facilities, and enhance the economic contribution and community role of arts, cultural, professional sporting and entertainment facilities.
- 6.8 The Camden Core Strategy recognises the importance of community facilities, specifically with regard to providing people with opportunities to meet, learn, socialise and develop skills and interests, which help to improve their quality of life. As such, LBC will seek to ensure that a wide range of services and facilities are provided in the Borough, including culture and arts facilities.

- 6.9 Policy CS10 (Supporting Community Facilities and Services) of the Core Strategy states that LBC will ensure that community facilities and services are provided for Camden's communities and people who work in, and visit, the Borough.
- 6.10 Additionally, CS10 identifies that LBC will "support the retention and enhancement of existing community, leisure and cultural facilities" and "facilitate the efficient use of community facilities and the provision of multi-purpose community facilities that can provide a range of services to the community at a single, accessible location".
- 6.11 Policy DP15 (Community and Leisure Uses) of the Camden Development Policies Document sets out LBC's detailed approach to the protection of existing community and leisure facilities and on contributions towards the provision of new facilities.
- 6.12 With regard to existing community facilities, Policy DP15 states that LBC will seek to protect existing facilities, unless they are to be replaced elsewhere, or it can be demonstrated that there is no demand for such facility, or other types of community facilities in that location.
- 6.13 Emerging Policy C3 (Cultural and Leisure Facilities) of the Local Plan Submission Draft reinforces the general principles of Policies CS10 and DP15.
- 6.14 Policy C3 identifies that LBC will protect cultural and leisure facilities valued by the community and which are important to the identity of the Borough or local area, cultural variety and richness, health and wellbeing, townscape, heritage and the economy. LBC will also seek to protect existing cultural and leisure uses from other conflicting uses, which are likely to adversely impact their continued operation.
- 6.15 With regard to new cultural and leisure facilities, emerging Policy C3 identifies that LBC will support new opportunities. Whilst it is noted that large-scale facilities should be located primarily in Central London, the policy goes on to recognise that smaller facilities will be appropriate anywhere in the Borough, providing that they do not have an adverse impact on the surrounding area or local community.
- 6.16 As highlighted above, there is clear policy support at all levels for the retention and enhancement of community facilities.
- 6.17 A Statement of Need, prepared by the Zabludowicz Collection, has been submitted as part of this Application. The Statement sets out the Zabludowicz Collection's mission statement and outlines the reasons for why the development is required. Fundamentally, an increase in gallery space, including exhibition, education and catering spaces, would facilitate significant growth of the Collection's programme, which aims to advance the public's awareness, appreciation and understanding of contemporary art.
- 6.18 The Scheme would result in the significant enhancement of an existing community facility through improvements to the existing building and the creation of additional gallery floorspace (+880 sqm) by way of an extension, new basement and internal reconfiguration.

- 6.19 The Scheme would improve the capability of the facility to cater for a wider range of exhibitions and events, in line with the ambitions of the Zabludowicz Collection, as set out within the Statement of Need. Furthermore, the improvements to the classroom and catering facilities would also facilitate greater use of the facility by the local community and visitors to the local area.
- 6.20 In land use terms, the Scheme is, therefore, considered to be in accordance with the relevant planning policy framework at all tiers and would make an important contribution to the local community.

Urban Design

- 6.21 High quality and inclusive design, which is delivered through mixed and integrated developments with well-planned public spaces, is encouraged by policy at all levels.
- 6.22 The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 7 of the NPPF outlines the requirement for good design and sets out that development should:
 - "Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
 - Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - Are visually attractive as a result of good architecture and appropriate landscaping".
- 6.23 Chapter 7 of the London Plan sets out the Mayor's policies on a number of issues relating to London's places and spaces. Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve the highest standards of accessible and inclusive design, while Policy 7.4 (Local Character) states that "development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings". Part D of Policy 7.6 (Architecture) states that buildings and structures should "not cause unacceptable harm to the amenity of surrounding land and buildings".

- 6.24 In accordance with Policy CS14 (Promoting High Quality Places and Conserving our Heritage), LBC will require development to be of the highest standard of design and to respect the local context and character. Policy CS14 further requires development to promote high quality landscaping, in addition to seeking the highest standards of access in all buildings and places.
- 6.25 Policy DP24 (Securing High Quality Design) provides further detail to Policy CS14, and states that the Council will require all development to consider:
 - "The character, setting, context and the form and scale of neighbouring buildings;
 - The character and proportions of the existing building, where alterations and extensions are proposed;
 - The quality of materials to be used;
 - The provision of visually interesting frontages at street level;
 - The appropriate location for building services equipment;
 - Existing natural features, such as topography and trees;
 - The provision of appropriate hard and soft landscaping including boundary treatments;
 - The provision of appropriate amenity space; and
 - Accessibility".
- 6.26 The design principles set out within the adopted policy documents are echoed in Policy D1 (Design) of the emerging Local Plan Submission Draft, which goes on to state that developments that are of poor design will be resisted.
- 6.27 As set out in more detail below, the proposed development is of high quality design and has been sensitively designed in order to respect the listed building and surrounding local context.

Heritage

- 6.28 The NPPF recognises the need to "conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations".
- 6.29 Accordingly, where development proposals would affect heritage assets, Paragraph 128 of the NPPF requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting, to understand the potential impact of the proposal on the significance of the asset. The NPPF goes on to state that the level of detail required should be proportionate to the asset's level of importance.
- 6.30 Paragraph 132 of the NPPF identifies that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or

lost through alteration or destruction of assets. As such, the NPPF states that any development proposals that would result in harm or loss should require clear and convincing justification.

- 6.31 In accordance with Paragraph 133, proposals which would cause substantial harm to, or total loss of, significance of a designated heritage asset should be refused, "unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss".
- 6.32 In line with the NPPF, Policy 7.8 (Heritage Assets and Archaeology) of the London Plan advises that development affecting heritage assets and their settings should conserve their significance.
- 6.33 The Core Strategy recognises that Camden has a rich architectural heritage, with over 5,600 buildings and structures that are nationally listed for their special historical or architectural interest. As such, Policy CS14 (Promoting High Quality Places and Conserving Our Heritage) the Core Strategy identifies that LBC has a responsibility to preserve and, where possible, enhance the Borough's rich and diverse heritage assets and their settings.
- 6.34 With regard to listed buildings, Policy DP25 (Conserving Camden's Heritage) of the Development Management Policies Document states that LBC will:
 - "Prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
 - Only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
 - Not permit development that it considers would cause harm to the setting of a listed building."
- 6.35 The development proposals are outlined in detail within the Design and Access Statement, prepared by Farshid Moussavi Architects, however a summary of the key design principles is set out below.
- 6.36 The Scheme design has evolved through two rounds of pre-application discussions with both planning and design and conservation officers at LBC.
- 6.37 The Scheme represents a high quality design. The proposed extension constitutes a high quality addition to the existing listed building and has been sensitively designed, using appropriate materials, to respect the listed building and the surrounding context.
- 6.38 The proposed extension has been designed to be subservient to the main chapel building, with the height of the proposed extension set 1.05 m below the main building ridgeline. This maintains the established hierarchy between the principal building to

- the front and the proposed extension to the rear. This hierarchy was noted to be of significant heritage value, which is preserved through the Scheme design.
- 6.39 The proposed walls and roof pitch to the new extension would be faced in a high quality brick to match the existing brick, resulting in a distinctive extension that is appropriately subservient to the host building. Where possible, salvageable bricks from the demolition of the north facing rear façade would be reused within the construction of the new extension.
- 6.40 New windows are proposed to provide natural daylight into the new gallery space within the rear extension. These windows would maintain the spacing of the existing windows on the east and west facades, thereby continuing the existing rhythm of the building.
- A Heritage Statement, prepared by Montagu Evans, has been submitted as part of this Application, which considers the potential impact of the proposals on the significance of the listed building. The Statement considers that despite the sensitive design of the proposals in terms of scale, character and appearance, officer's may identify "less than substantial harm", caused by the removal of historic fabric from the listed building. Notwithstanding, the Statement concludes that the public benefits of the Scheme, as listed below, outweigh any "less than substantial harm" associated with the removal of historic fabric from the listed building.
- 6.42 The potential public benefits of the proposed development include:
 - · Improved gallery facilities accessible to all; and
 - New high quality architecture, which makes a positive contribution to the local character and distinctiveness.
- 6.43 In accordance with the above, and the further details contained within the Design and Access Statement and Heritage Statement, the Scheme is considered to be of an appropriate scale, character and appearance and would achieve a high quality design consistent with the policy objectives of the Development Plan.

Amenity

- 6.44 At all policy levels there is a requirement to prevent unacceptable harm to amenity arising from new development. Paragraph 109 of the NPPF seeks to prevent development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.
- 6.45 London Plan Policy 7.6 (Architecture) states that buildings and structures should not "cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate".

- 6.46 In accordance with Policy CS5 (Managing the Impact of Growth and Development), LBC will seek to protect and enhance the environment, heritage, amenity and quality of life of local communities. Policy SC5 states that LBC will protect the amenity of Camden's residents and those working in and visiting the borough by:
 - "Making sure that the impact of developments on their occupiers and neighbours is fully considered;
 - Seeking to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities; and
 - Requiring mitigation measures where necessary."
- 6.47 Accordingly, Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) of the Development Policies Document states that the Council "will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity". In determining whether proposals would result in harm, the following factors will be considered:
 - Visual privacy and overlooking;
 - Overshadowing and outlook;
 - Sunlight, daylight and artificial light levels;
 - Noise and vibration levels;
 - Odour, fumes and dust;
 - Microclimate; and
 - The inclusion of appropriate attenuation measures.
- 6.48 Consistent with the adopted policy position, Policies A1 to A5 of the emerging Local Plan Submission Draft seek to afford protection to the amenity of residents, workers and visitors to the Borough. Upon adoption, these policies will replace Policy CS5 and Policy DP26.

Noise

- 6.49 London Plan Policy 7.15 (Reducing and Managing Noise) identifies the implications of noise as part of development proposals, stating that development proposals should seek to minimise the potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.
- 6.50 The Core Strategy identifies that noise / vibration pollution can have major effect on amenity and health. This is noted to be particularly significant due to the Borough's dense urban nature.
- 6.51 Policy DP28 (Noise and vibration) of the Development Policies Document states that the Council will seek to ensure that noise and vibration is controlled. As such, development that is likely to generate noise pollution, or development that is sensitive

- to noise in locations with noise pollution, will be resisted unless appropriate attenuation measures are provided.
- 6.52 With regard to plant, Policy DP28 identifies that planning permission will only be granted where such plant can be operated within the defined noise thresholds and without causing harm to amenity.
- 6.53 The Scheme includes the proposed introduction of space heating and comfort cooling for the extension by way of Variable Refrigerant Volume (VRV) air source heat recovery units. The external condenser units would be located between first and second floor levels, in a dedicated plant room, and would be accessed from the second floor level.
- 6.54 In light of the proposals, an Environmental Noise Survey, prepared by Noico, forms part of this Application to ensure that the noise control requirements are satisfied.
- 6.55 The Environmental Noise Survey determines the background noise levels assesses the potential impact of the proposed plant. It concludes that provided the below mitigation measures are adopted, the proposed plant would operate below the maximum noise levels. The proposed mitigation measures comprise:
 - All windows are sealed and blocked up on the inside of the plant room;
 - All plant room walls are acoustically lined with 100mm absorptive lining;
 - The 'air out' from each unit is ducted via a 400mm plenum and a 1.5m long attenuator; and
 - The attenuators terminate in an acoustically lined discharge plenum.

Daylight and Sunlight

- 6.56 Paragraph 26.3 of the Development Policies Document states that LBC will expect elements including, inter alia, daylight and sunlight to be considered at the design stage of a scheme to prevent potential negative impacts of the development on occupiers and neighbours.
- 6.57 The Scheme includes the erection of a single storey extension to the rear part of the existing building. As such, and in order to comply with the requisite planning policies, a Daylight and Sunlight Assessment, prepared by Point 2 Surveyors, has been submitted as part of this Application.

Daylight Assessment of Neighbouring Buildings

- 6.58 In respect of daylight, the Assessment refers the following:
 - Levels of Vertical Sky Component (VSC) A measure of the skylight reaching a point from an overcast sky. The BRE guidelines state that if the VSC at a point at the centre of a window is less than 27%, and it is less than 0.8 times its former value, the levels of daylight may be adversely affected;

- No-Sky Line (NSL) A measure of the distribution of daylight within a room.
 The BRE suggest the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value.
- 6.59 The Assessment demonstrates that all neighbouring windows that serve habitable rooms would meet the BRE guidelines' recommended levels of VSC.
- 6.60 With regard to NSL, the Assessment demonstrates that 361 out of 371 (97%) of residential rooms would meet the BRE recommended levels. Of the 10 rooms that experience greater effects, 2 are known to serve non-habitable rooms and, therefore, do not require further analyses in line with the BRE guidelines. The remaining 8 rooms would experience between a 27% and 42% reduction. Overall, the daylight effect to these rooms is considered negligible to minor.

Sunlight Assessment of Neighbouring Buildings

- 6.61 In relation to sunlight, analysis centres on Annual Probable Sunlight Hours (APSH) and Overshadowing. In terms of APSH, the BRE guidelines recommend that levels should be at least 25% of the total available.
- 6.62 The Assessment demonstrates that 245 out of 250 south facing windows (98%) would either meet or exceed the recommended levels of APSH. Of the 5 remaining, 4 serve non-habitable rooms and can be set aside. The remaining 1 window would experience a reduction of 24%, which is marginally outside of the BRE recommended standard and the retained levels of APSH to this window are commensurate with other residential properties in the vicinity. Overall, the sunlight effect to this 1 window is considered negligible to minor.

Summary

6.63 The Assessment concludes that overall, excellent levels of daylight and sunlight amenity would be achieved, with the results falling within the practical application of the BRE guidelines.

Energy and Sustainability

6.64 One of the core planning principles set out in the NPPF is for planning to:

"Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)".

6.65 Section 10 of the NPPF contains the Government's policy on climate change. Paragraph 96 states that:

"In determining planning applications, local planning authorities should expect new development to:

- Comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the application, having regard to the type of development involved and its design, that this is not feasible or viable; and
- Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption".
- At a regional level, the Mayor seeks to achieve an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025 (London Plan Policy 5.1 Climate Change Mitigation). Policy 5.2 (Minimising Carbon Dioxide Emissions) of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions by achieving a reduction of 40% above Part L of the building regulations in accordance with the following energy hierarchy:
 - Be Lean: use less energy This involves the use of passive and energy
 efficiency design measures to reduce the energy requirement and
 subsequent carbon footprint of the site. These provide a footprint which
 delivers compliance with Building Regulations Part L (2010) and the Baseline
 Energy and Carbon emission figures for the development; then
 - Be Clean: supply energy efficiently The use of a central energy centre has been considered to serve the development, to provide the primary heating and cooling requirements for the development; then
 - Be Green: use renewable energy The use of renewable energy has been investigated in the context of the site and the overall usage pattern of energy throughout the development.
- 6.67 It should be noted that in April 2014, the Mayor produced its Sustainable Design and Construction SPG which outlined that a 35% carbon reduction target beyond Part L 2013 Building Regulations will be applied.
- 6.68 Policy 5.3 states that development proposals should demonstrate that sustainable design standards are integral to the proposal. This should include:
 - Minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems);

- Avoiding internal overheating and contributing to the urban heat island effect;
 and
- Promoting and protecting biodiversity and green infrastructure.
- 6.69 Policy 5.5 (Decentralised Energy Networks) states that the Mayor expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025.
- 6.70 Policy 5.7 (Renewable Energy) further states that major development should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 6.71 At a local level, Policy CS13 (Tackling Climate Change through Promoting Higher Environmental Standards) requires all development to take measures to minimise the effects of, and adapt to, climate change. Furthermore, the policy states that development will be encouraged to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.72 Additionally, in accordance with Policy DP22 (Promoting Sustainable Design and Construction) of the Development Policies Document, LBC will require development to incorporate sustainable design and construction measures. As such, Policy DP22 identifies that non-domestic developments of 500 sqm or more will be expected to achieve BREEAM 'very good'.
- 6.73 Eight Associates have produced an Energy Assessment and a BREEAM Preliminary Assessment, which show the measures adopted in order to meet the targets set by the Mayor and LBC.
- 6.74 The Energy Assessment confirms that the development will reduce carbon emissions by 33.6% from the fabric efficiency measures ('Be Lean'), and will reduce total carbon emissions by 35.49% over Part L 2013 Building Regulations with the further inclusion of low and zero carbon technologies.
- 6.75 With regard to sustainability, the BREEAM Preliminary Assessment demonstrates that the proposed development would achieve a score of 57.0%, which equates to BREEAM 'very good'.

Structural Matters

- 6.76 With regard to basement developments, Policy DP27 (Basements and Lightwells) of the Development Policies Document states that, where appropriate, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability.
- 6.77 Policy DP27 goes on to state that LBC will only permit basement development that does not cause harm to the built and natural environment and local amenity, and

does not result in flooding or ground instability. Accordingly, any application will be required to demonstrate that the proposed development would:

- Maintain the structural stability of the building and neighbouring properties;
- Avoid adversely affecting drainage and run-off or causing other damage to the water environment; and
- Avoid cumulative impacts upon structural stability or the water environment in the local area.
- 6.78 In accordance with Policy DP27, applications will also be expected to consider whether the proposals would:
 - · Cause harm the amenity of neighbours;
 - Lead to the loss of open space or trees of townscape or amenity value;
 - Provide satisfactory landscaping, including adequate soil depth;
 - Harm the appearance or setting of the property or the established character of the surrounding area; and
 - Protect important archaeological remains.
- 6.79 A Basement Impact Assessment has been prepared in support of this Application, which considers the structural design of the proposed development. The Assessment concludes that the proposed development would not have an effect on the local hydrological and hydrogeological setting or the stability of the natural and / or built environment.

Servicing

- 6.80 Policy DP16 (The Transport Implications of Development) of the Development Policies Document states that the Council will seek to ensure that development is properly integrated with the transport network. The supporting text to this policy identifies that, where appropriate, applicants should provide an overview of the servicing requirements of the development after occupation and of the servicing provision to be made to accommodate this.
- 6.81 Furthermore, emerging Policy A1 (Managing the Impact of Development) identifies that in determining an application, to protect the quality of life of occupiers and neighbours, the Council will consider the "transport impacts of a proposed development, including the use of Transport Assessments, Travel Plans and Servicing and Delivery Management Plans".
- 6.82 Accordingly, a Delivery and Servicing Management Plan has been submitted in support of this Application, which sets out the servicing and delivering arrangements and proposed management regime for the proposed development.

7.0 CONCLUSION

- 7.1 As detailed within this Statement, this Application proposes works to improve the existing gallery facilities, including the erection of an extension to the existing building (including partial demolition and rebuild of the rear part), excavation of a basement level below part of the existing building, localised demolition and other associated external and internal works.
- 7.2 The Scheme would result in the provision of an additional 880 sqm (GIA) of gallery floorspace and would provide enhanced educational and catering facilities to meet the operational needs of the Zabludowicz Collection, as outlined within the Statement of Need.
- 7.3 This Statement has assessed the Scheme against the Development Plan, as required by S38(6) of the Planning and Compulsory Purchase Act 2004, and the proposals have been formulated in accordance with the adopted Development Plan and through detailed pre-application discussions with LBC.
- 7.4 The Scheme would retain and enhance an existing community facility, thereby broadening the range of exhibitions, events and classes that the gallery could facilitate, and enhancing the functionality of the gallery as a community facility. From a land use perspective, the Scheme is, therefore, considered to be wholly compliant with the relevant planning policy framework.
- 7.5 The Scheme is considered to be of an appropriate scale, character and appearance and would achieve a high quality design, consistent with the design policy objectives of the Development Plan.
- 7.6 The Scheme has been developed to respond sensitively to the listed building and neighbouring buildings. From a heritage perspective, the Scheme is of an appropriate scale, character and appearance. It has, however, been identified that Officer's may identify 'less than substantial harm', caused by the removal of historic fabric from the listed building. Notwithstanding, it is considered that the public benefits of the proposed development outweigh any less than substantial harm associated with the removal of historic fabric from the listed building. Therefore, the Scheme is considered to be in accordance with the planning policy framework at all levels.
- 7.7 A suite of technical reports has been prepared in support of this Application, which demonstrate compliance with national, regional and local planning policy regarding issues including noise, daylight and sunlight, energy and sustainability, structural matters and servicing.
- 7.8 In conclusion, the Scheme is considered to be in accordance with the relevant planning policy framework at all tiers and will make an important contribution through

the enhancement of an existing community facility within the Borough. The Scheme is therefore considered to be both appropriate and beneficial.

7.9 We therefore ask that this Application is granted.

APPENDIX 1.0 PRE-APPLICATION LETTER FROM CAMDEN, DATED 26 JULY 2016

Date: 26/07/2016

Our ref: 2016/1865/PRE Contact: Zenab Haji-Ismail Direct line: 020 7974 3270

Email: Zenab.haji-ismail@camden.gov.uk

Camden

Development Management

Regeneration and Planning
Culture & environment directorate
London Borough of Camden
2nd Floor, 5 Pancras Square

London N1C 4AG

Tel: 020 7974 3270

zenab.haji-ismail@camden.gov.uk www.camden.gov.uk/planning

Email to: Harriet.Barber@montagu-evans.co.uk

Dear Ms Barber,

Town and Country Planning Act 1990 (as amended) Re: 176 Prince of Wales Road, London, NW5 3PT

Thank you for your enquiry received on the 31 March 2016 and revised set of plans submitted on 13 June 2016, regarding the demolition of existing rear element and erection of a new extension to accommodate additional gallery space (class D1).

This letter represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Policy Context

The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (LDF) Core Development Strategy and Development Plan Policies adopted in November 2010 and the revised London Plan adopted 2016. The LDF is accompanied by the Camden Planning Guidance (CPG) which was adopted in July 2015 and partly revised since in 2015. These can all be viewed online at www.camden.gov.uk/planning.

Planning History

03/03/1994 - The demolition of a single storey lean-to and the erection of a part 2 part 3 storey extension to the Drama Centre permission was not implemented

07/03/1994 – Planning permission was granted for the erection of a part 2 part 3 storey extension to the side of the Drama Centre for educational use - Ref. 9301292 - permission was not implemented

18/07/2006 – planning permission and listed building consent for a new disabled access ramp, new boundary railings, new column and landscape uplighters all in conjunction with the use of the building as an Art Gallery

Overview of the Site and Proposal

The buildings at 176 Prince of Wales Road comprise an original church built sometime in 1871 with a series of extension on the northern and western sides. The Church was later converted to be used as a drama centre sometime in the 80s and has since been used as an art gallery. The site is Grade II listed.

The area surrounding the site comprises a mix of uses. Haverstock School is located directly to the south of the site, accessed via Crogsland Road, and the Saint Silas the Martyr, Kentish Town Church and Hampstead Seventh Day Adventist Church are located in close proximity to the site.

The applicant has noted through pre application meetings that due to large art pieces and exhibitions, there is a need for a larger gallery space as well as adequate storage facilities. The applicant therefore seeks to excavate a basement to provide additional storage and erect an extension to the middle and rear galleries to provide additional gallery space.

Land Use

Policy CS10 seeks to protect existing cultural facilities. The applicant has noted the difficulty currently posed by the existing layout. The applicant seeks to extend the gallery offering through an extension. The proposal is supported and considered acceptable in land use terms provided that the considerations below are addressed with any application.

Design and Heritage

During pre-application discussions on site, officers noted

- The roof height of the rear extension should not be the same as the existing height of the front building. A hierarchy should be established to respect the existing form.
- Consideration should be given to the potential for the removal of the western boundary wall, adjacent to the rear building, to provide improved visibility to the gallery.
- Consideration should be given to the introduction of windows to the rear facade of the back building to provide: the option of natural light to the gallery space, increase the animation of this facade and to improve natural surveillance of the open space to the rear. The principle of animating the back wall is welcomed by officers.
- Consideration should be afforded to the ways in which the area of open space to the rear of the building could be developed / improved. Officers advise that it would be beneficial to introduce other LB Camden teams into these discussions, including the parks/estates team and community/cultural team.

A revised set of plans were submitted on 13 June 2016 which have subsequently been reviewed and discussed.

The proposal seeks to provide a high quality replacement proposal. The revised proposal features a link between the prominent existing church and the proposed extension so that the old and the new are read distinctly. This approach is welcomed.

The height of the extension has been lowered to read as a separate element and again, this is considered acceptable. The introduction of windows to the rear elevation is welcomed. It is understood that for security reasons the western wall boundary wall will remain intact, this is considered acceptable.

Notwithstanding detailed design, the critical issue is the less than substantial harm to the Grade II listed building. The proposal would result in less than substantial harm to the Grade II listed building due to the loss of historic fabric.

Paragraph 135 of the NPPF states

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Under the NPPF this requires that the harm be balanced against the public benefits of the scheme, including securing the optimum viable use of the heritage asset. The applicant would be required to submit a business plan at the very least with any application. It would be useful to know why the proposed part demolition is necessary and how this would help retain the existing gallery.

On other matters, the applicant is asked to continue to engage with property services team to understand whether the open space to the rear could be used by the gallery.

<u>Amenity</u>

Protecting the amenity of residents and visitors is also a key Council priority. Policies CS5 ('Managing the impact of growth and development') and DP26 ('Managing the impact of development on occupiers and neighbours') set out the Council's stance in this respect.

The proposal is considered to follow a similar footprint as the existing. Although there is an increase in height and bulk, it is sufficiently set away from neighbouring occupiers and is unlikely to result in harm to the amenity of adjoining occupiers. any application should be supported with a daylight and sunlight assessment. The proposed introduction of windows to the rear would not result in harm as it would overlook open space. Full details should be provided of the existing and expected staff and visitor numbers.

Should the applicant be successful in securing the area to the rear for use by the gallery, a management plan would be required to manage any noise/nuisance to the surrounding residential properties. A draft plan should be submitted as part of any application.

Transport/ Highways

Given the scope of works proposed, it is likely that transport planners may seek a highways contribution to be secured as part of the redevelopment of the site. In practice, this would seek to repave the highway adjacent to the site, to make good any damage that may occur as a result of the construction works at the site. This financial estimate would be calculated at the time of any application and be secured via Section 106 Legal Agreement.

The Council would expect to see visitor cycle parking. The more detail you can provide when the planning application is submitted, the better it is in terms of discharging conditions later on. Please refer to table 6.3 of the London Plan to establish the appropriate number of cycle parking spaces that would be required onsite.

Basement Excavation/Structural Issues

The proposal includes the excavation of a lower ground floor level to the front part of the building. Camden has a comprehensive policy framework dealing with basement applications. Policy DP27 (basements and lightwells) requires developers to demonstrate that proposed basements will not harm the built and natural environment or local amenity, result in flooding or lead to ground instability to both the host and nearby buildings.

Policy DP27 is supported by CPG4: Basements and lightwells. Any application would require a 'Basement Impact Assessment' (BIA) to be submitted, clearly identifying any potential impacts of the proposed scheme on structural stability and the water environment and sets out mitigation measures.

An independent verification of the Basement Impact Assessment will be required, which would be paid for by the applicant. Since July 2015, CPG4 was updated requiring a BIA in the following situations:

- Where a scheme requires applicants to proceed beyond the Screening stage of the Basement Impact Assessment (i.e. where a matter of concern has been identified which requires the preparation of a full Basement Impact Assessment);
- Where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow; or
- For any other basement applications where the Council feels that independent verification would be appropriate (e.g. where conflicting evidence is provided in response to a proposal).

A full scoping study is required as part of any application, identifying the potential impacts for each of the matters of concern. I have attached a BIA audit form with this pre-application letter; it would be useful if this form could be completed so we may instruct our independent auditors to review the BIA.

We would advise entering into consultation with local residents at this stage, in order to fully understand and address their concerns before an application is made.

Detailed guidance is available within CPG4, which is available to view on the Council's website. In particular, it is imperative that the BIA is carried out by suitably qualified professionals and is fully comprehensive of stages 1-4 of the BIA process.

Construction Management Plan

The main highways issue in this case is the potential impact of construction / delivery vehicles associated with the basement excavation on the local highway network. A draft Construction Management Plan (CMP) would also be required to be submitted with any application setting out how construction matters would be dealt with, for example deliveries, how material will be stored and construction waste removed from site etc. This is particularly the case owing to the type of proposal sought; it is likely that the applicant would also be required to enter into a \$106 Legal Agreement in order to ensure the measures set out in this plan are adhered to. Please see CPG7 for details of the particular elements required to be included in the draft CMP. For ease of reference however I also attach a slightly updated list of CMP requirements, which transport planners have prepared more recently than the CPG guidance.

Please note a CMP contribution would be sought for Implementation Support Contribution will be used to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and ensure that the planning objectives we are seeking to secure are actually achieved.

Construction/ Demolition Management Plans: implementation fee: indicative charging rates				
Small/ less complex (0-10 homes/ 0-1999sqm other uses)	£1,140			
Medium size and complexity (10-50 homes, 2000-4999sqm other uses)	£3,240			
Major and complex applications (50-499 homes/ 5,000-9,999sqm other uses)**	£7,620			

An advice note is attached and details of this are also available online here: www.camden.gov.uk/s106. The fee will be payable alongside other obligations to the planning obligations team.

Consultation

You are strongly encouraged to engage with neighbouring occupiers at an early stage in the process, given the likely concerns residents may have with the comings and goings of construction / delivery vehicles particularly if a demolition and excavation of basements construction are proposed. Although adjoining occupiers will be notified of any application by us, initial consultation may help offset any concerns neighbours have before any application is submitted.

Conclusion

The application in principle is considered acceptable in principle both in land use terms and the proposed approach to design. However the applicant would need to submit a business case and supporting information demonstrating that the less than substantial harm proposed would be outweighed by the public benefit the scheme would provide.

How to submit your application

Please submit you application electronically via the national planning portal.

When submitting a planning application, the following information will be required:

- Appropriate fee
- Site location plan
- All existing elevations (including the front and the side), floor plans, sections and roof plan
- All proposed elevations (including the front and the side), floor plans, sections and roof plan
- A draft construction management plan
- Design and access statement
- Heritage statement
- A draft management plan
- Daylight and sunlight assessment

After you submit your application

It would be useful if you could let Ian Gracie know when you have submitted the application along with the planning portal reference number. Ian will then pick the application up as the case officer.

We are legally required to consult on the application with individuals who may be affected by the proposals. We will notify your neighbours by letter, put up a notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

All consultation responses will be available to view on the Council's website using the planning application search page. It is likely that an application of this size would be determined at DC Committee.

I trust the above provides a useful summary; however should you have any queries about the advice contained in this letter please contact Zenab Haji-Ismail or Ian Gracie on **020 7974 3270/2507**.

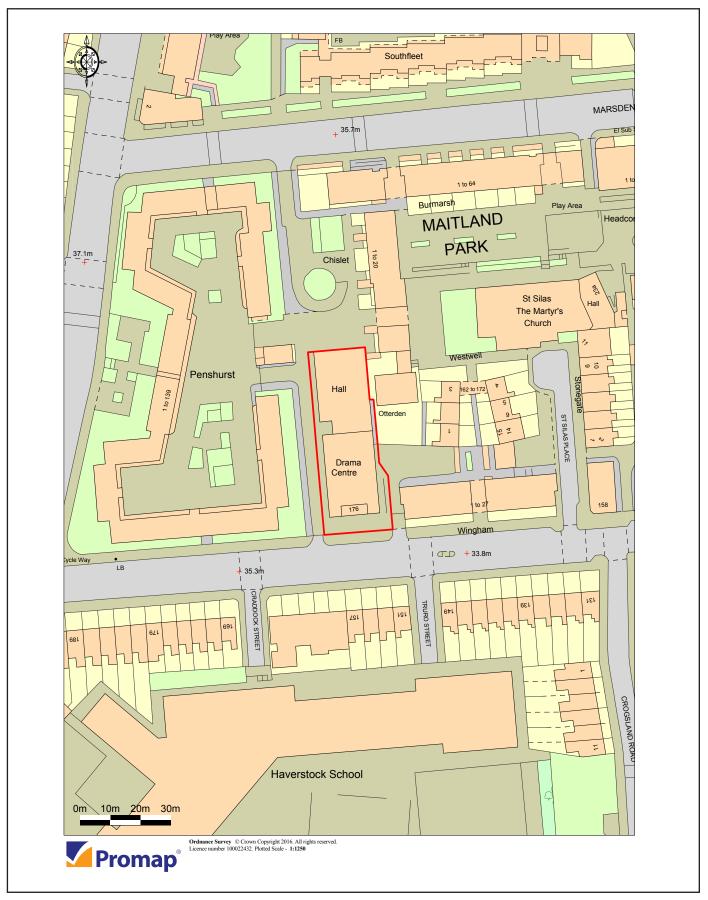
Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Zenab Haji-Ismail Senior Planning Officer

APPENDIX 2.0 SITE LOCATION PLAN



Site Plan:

176 Prince of Wales Road, London NW5 3PT

Date: December 2016





Scale: 1:1250@A4 North A



Chartered Surveyors

5 Bolton Street, London W1J 8BA

Tel: 020 7493 4002 Fax: 020 7312 7548 www.montagu-evans.co.uk