

Project Lighthouse Planning Statement

Holy Trinity Church

7 April 2017

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1.0 **Introduction**

- 1.1 This Planning Statement has been prepared on behalf of Holy Trinity Swiss Cottage. It accompanies a full planning application in relation to the redevelopment of Holy Trinity Church, Finchley Road, London, NW3 5HT in the London Borough of Camden. The proposed replacement building - the Lighthouse - will be a multi-use church and community centre.
- 1.2 The application site is located directly opposite Finchley Road tube station on Finchley Road and is within the designated Finchley Road/Swiss Cottage Town Centre. The existing building is not listed or locally listed, but is adjacent to the Fitzjohns Netherhall Conservation Area and opposite the South Hampstead Conservation Area.
- 1.3 The existing Church dates to the 1970s. It was constructed together with adjacent buildings, Lief House and Alban House. These buildings replaced an earlier Victorian church.
- 1.4 Holy Trinity Church's services and activities have expanded over the years and become a central part of the local community. The existing buildings no longer provide sufficient floorspace to meet the needs of the Church and community. The proposed development will therefore result in the efficient use of the site, allowing the Church increased floorspace in order to continue to play a vital role within the local community; as well as providing sheltered accommodation and employment generating café space to assist in meeting local demand.
- 1.5 The proposed redevelopment of the Church has been driven by the congregation. The needs of the Church have been central to the design aspirations, particularly regarding the provision of community facilities to extend its commitment to working within the local community.
- 1.6 This report assesses the scheme against the relevant national and local planning policies.
- 1.7 The full planning application submission documentation is listed within the accompanying covering letter.

2.0 **Site and Surroundings**

Application Site

- 2.1 The application site measures 1004 sqm and comprises the existing Church. It is located within Finchley Road/Swiss Cottage Town Centre, opposite Finchley Road tube station.
- 2.2 The existing footprint of the Church occupies the majority of the site and comprises a single storey building. The Church is accessed via ten steps from Finchley Road at the western elevation. An accessible entrance is situated on the northern elevation accessed via a footpath adjacent to the northern edge of the site (but outside the red line boundary). The footpath also allows access from Finchley Road to Alban House, a residential building, situated at the rear (east) of the Church.
- 2.3 Lief House owns the car park, Sumpter Close and the pedestrian walkway. The Church leases two spaces within the car park from Lief House. Vehicle access to the Church (for drop-off) is via Sumpter Close from Finchley Road. Sumpter Close can only be accessed by vehicles heading south along Finchley Road.
- 2.4 The site is not situated within a flood risk zone and has a Public Transport Accessibility Level (PTAL) rating of 6b (where 1 is least accessible and 6b is most accessible).
- 2.5 The site itself is not located within a Conservation Area, but is adjacent to the Fitzjohns Netherhall Conservation Area and opposite the South Hampstead Conservation Area.
- 2.6 A full description and analysis of the site's physical and historic context is provided within the Design and Access Statement prepared by Haworth Tompkins, which should be read in conjunction with this report.

Surrounding Area

- 2.7 In its immediate context the application site is bounded by Finchley Road to the west, Lief House and associated car parking area to the north/north west, Alban House to the east and 120 Finchley Road to the south/south east.
- 2.8 Lief House is a four storey building and is home to the British College of Osteopathic Medicine. It comprises the pedestrian walkway which aligns the northern edge of the site. This footpath is used to access the main entrance to Lief House and also the side (north) entrance to the Church and the main entrance to Alban House. It is a 1970s red brick building. Alban House is a seven storey residential block, also constructed of red brick. The Church, Alban House and Lief House are of a complementary design all constructed of the same red brick.
- 2.9 No.120 Finchley Road is located to the south and south east of the Church. Planning permission has been granted for a seven storey development largely comprising of student accommodation, with a retail unit at ground floor. This is currently under construction.
- 2.10 In its wider setting, the site is located within Finchley Road/Swiss Cottage Town Centre. Finchley Road comprises a number of retail units including chain stores and independent retailers with residential units above.

3.0 **Planning and Project History**

Planning History

- 3.1 A review of the London Borough of Camden's online planning records shows that there have been no recent planning applications on the site.
- 3.2 A Section 73 application was submitted in November 2015 to amend the design of the proposed new building at 120 Finchley Road. The Holy Trinity Church team has reviewed this application to ensure it does not impact on the proposed redevelopment. Legal discussions have also been held regarding the party wall between the site and 120 Finchley Road. A party wall agreement is in place.

Pre-Application Discussions

- 3.3 An initial pre-application meeting for the redevelopment of Holy Trinity Church was held by Haworth Tompkins, on site with Gavin Sexton and Kevin Fisher on the 7th March 2014. During 2015, the scheme evolved to incorporate feedback from the pre-application discussion and the Church to rationalise the design and brief to reduce costs. Further pre-application meetings were held on 21 July and 9 November 2016 which discussed the proposed development in detail. Telephone and email correspondence with LBC's case officer and transport officer has continued during early 2017.
- 3.4 The scheme was taken to a Design Review Panel (Chair's Review) on 20th January 2017.
- 3.5 Informal pre-application discussions with TfL have taken place during early 2017. TfL has undertaken a site visit to inform these discussions.

Public Engagement

- 3.6 Extensive community consultation has been undertaken to develop these proposals. This included a public open evening on 20th July 2016 to present the scheme to the wider community.
- 3.7 In addition to this numerous detailed discussions have been completed with Alban House and Leif House.
- 3.8 A full list of the consultation carried out is included at Appendix 1 of this report.

4.0 Proposed Scheme

- 4.1 The application proposes the demolition of the existing church building and the redevelopment of the site to create the Lighthouse church and community centre. The proposed Lighthouse is a multi-height building which at its maximum is six storeys (plus rooftop plant and half-basement) and at its minimum two storeys. It will provide the following:
- 1 Lower ground level multi-purpose room for meetings, school sport activities and music, with a capacity of 50, plus a recording studio
 - 2 Café fronting Finchley Road, spanning ground and first floor levels (for a maximum capacity of 30 people)
 - 3 Central two-storey 450 seat auditorium, across the first and second levels
 - 4 Ancillary flexible spaces for ministry, community uses and administration at first, second and third floor levels
 - 5 Fourth floor sheltered residential accommodation for vulnerable 16-18 year olds – the Ark. The Ark will provide two 2-bed and one 3-bed units of accommodation for seven young people. Each unit has a shower room and small kitchen/dining area. In addition to the specialist residential accommodation, there is a communal area, office and laundry room. The Ark will provide safe and secure accommodation, staffed for 24 hours a day
 - 6 One 1-bed flat (49m² GIA) and one 2-bed flat (71m² GIA) will be provided at fifth floor level. The two bed flat will be wheelchair accessible. These will provide affordable accommodation for students at London based Church of England training colleges.
 - 7 Ancillary cycle parking, a bin store and a substation is also proposed.
- 4.2 The existing Church building is approximately 501sqm in area, and the proposed building would be 2,350sqm (GIA) (plus ancillary bin store, cycle parking and substation), giving an uplift of 1,849 sqm.
- 4.3 The Design and Access Statement provides a detailed understanding of the design and location of the proposed uses. The Building Uses and Management Plan provides a detailed understanding of the proposed uses throughout the Lighthouse. It includes anticipated working hours for the proposed uses. It is envisaged that the Lighthouse would not be in use beyond 10pm on Mondays to Saturdays and 9pm on Sundays with the exception of the overnight accommodation.

5.0 **Planning Policy Considerations**

5.1 This section outlines the legislation and policy which is relevant to the planning impacts of the proposals.

National Planning Policy

5.2 The National Planning Policy Framework (NPPF, 2012) sets out the Government planning policies for England. An overview of the policies relevant to the application is included at Appendix 2.

Statutory Development Plan

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

5.4 The Statutory Development Plan for the application site comprises the London Plan (2016, as amended) and the London Borough of Camden's Local Development Framework, including the:

- 1 Core Strategy (2010)
- 2 Development Policies (2010)

5.5 The Council is preparing an emerging Local Plan (2016); consultation on the Local Plan ran from 28th February to 4th April 2016, copies of representations along with the Plan were submitted to the Secretary of State for public examination by a Planning Inspector (Katie Child) on 24th June 2016. The Draft Local Plan (2016) has only been afforded limited weight as it is not a formally adopted statutory document.

5.6 A policy matrix has been prepared which sets out relevant policies from the Statutory Development Plan in regards to the redevelopment of Holy Trinity Church is included at Appendix 3.

The London Plan

5.7 The London Plan (2016, as amended) provides the spatial development strategy for Greater London until 2031. The policy matrix at Appendix 3 includes the London Plan policies relevant to the proposed scheme.

Other Material Considerations

5.8 The policy matrix at Appendix 3 also includes other relevant material considerations such as Supplementary Planning Guidance.

6.0 **Assessment of Scheme**

6.1 The key considerations in assessing the proposed development are as follows:

- 1 The replacement of the Church building
- 2 The provision of community facilities
- 3 The development's architectural quality and response to the area's existing/emerging townscape
- 4 The effects of the proposals on heritage assets
- 5 Amenity impacts of the proposed development
- 6 The impact of the proposal in terms of transport, parking and servicing
- 7 Ensuring that the construction and subsequent operation of the site is sustainable and energy efficient
- 8 Approach to Community Infrastructure Levy (CIL)

6.2 These matters are assessed in turn below, having regard to policies detailed in Appendix 2 and Appendix 3.

Replacement of the Church Building

6.3 The proposals constitute the demolition of the existing Church and its replacement with the Lighthouse, a multi-use church and community centre. The site has housed a faith facility for over 100 years and the principle of a Church in this location is well established. Furthermore, the wider community services and facilities provided by the current Holy Trinity Church have been a fundamental part of the community since its redevelopment in the 1970s. See Appendix 4 for Church's definition of a place of worship.

6.4 The redevelopment of the existing Holy Trinity Church is critical to the long term future of the congregation and the provision of the faith based community services that it delivers. Faith based social action (when people of faith work together, often with others outside their faith community, in order to achieve real and positive change within their community, or in wider society) underpins the ethos of Holy Trinity Church. Crucially, the current auditorium does not have the capacity to accommodate the average weekly attendance of 160 worshipers. Furthermore, it is anticipated that once the Lighthouse is open around an additional 300 people will become involved with the Church, increasing numbers attending church services.

6.5 The proposals will retain, modernise and expand the existing community and cultural facilities offered. The increased capacity/floorspace will allow for the enhancement of faith based social action delivered by the Church. This accords with London Plan Policies 3.1 and 3.16; Core Strategy Policy CS10; DP15; and, Draft Local Plan Policy C2. The site will be redeveloped with a church building of greater capacity and will provide rooms for the community to hire at a discounted rate.

6.6 Furthermore this adheres to the requirement of paragraph 70 of the NPPF that notes established facilities should develop and modernise in a way that is sustainable in order to retain the existing community benefits.

6.7 A Church is an important building which should command presence in the streetscape. At present the existing Church building is diminutive and of no particular design merit. The proposed design of the Lighthouse increases its presence within the local community whilst respecting the local context and character, in accordance with London Plan Policy 7.4, Camden

Development Policy DP24, Draft Local Plan Policy D1 and the guidance as set within CPG 1. See the 'Design' Section below for further assessment.

The Provision of Community Facilities

A Multifunctional Christian Community Centre (the Lighthouse)

- 6.8 The principal element of the development is the creation of a new, modern facility which incorporates a multi-use Church and community centre which provides faith based social action for the local and wider community. As established above, the principle of the replacement of the existing Church and the enhancement of the faith based uses accord with the London Plan Policy 3.1; DP15; Core Strategy Policy CS10; and, Draft Local Plan Policy C2.
- 6.9 The facilities and services that will be provided are the consequence of the congregation's input into the development process, a process which has been community led to ensure local need is met (see Appendix 1). This approach corresponds to the guidance set within the Social Infrastructure SPG (Chapter 9 Community Facilities). The Core Strategy notes that the Council will seek to support community organisations and religious groups to help meet their need for faith facilities (paragraph 10.2).
- 6.10 The additional floorspace provided allows for the co-location of a range of facilities and services whilst making the most efficient use of land. This approach conforms to Policy CS2. The internal arrangement of the proposed building ensures the building is flexible to adapt to the varied needs of the Congregation, which in turn maximises the array of shared uses and users, this complies with Policy DP15.
- 6.11 The site is located within the highly accessible Finchley Road/Swiss Cottage Town Centre boundary, an area identified by Policy DP15 as suitable for the location of community facilities.
- 6.12 The proposed quantitative increase in floorspace (1,849 sqm), as well as the proposed qualitative improvements accord with London Plan policy 3.16, Core Strategy Policies CS1 and CS7 and Draft Local Plan Policy A1 which seek social infrastructure in accessible locations where the multi-functional use of the facility can be maximised.
- 6.13 Core Strategy Policy DP1 requires 50% of additional floorspace provided to be housing, unless incompatibility with the primary use can be justified. The primary function of the proposal is for faith based worship and community services. The constrained site limits the amount of floorspace that can be provided. The proposal represents the full use of the site, for the required church and wider community facilities. This accords with the planning policies which seek to protect and expand the provision of community facilities and services, particularly in accessible locations. The Lighthouse could not function and expand within this constrained site whilst giving over half the floorspace to residential accommodation.
- 6.14 Notwithstanding the above, sheltered accommodation for vulnerable young people (The Ark) is proposed, together with two related ancillary residential units comprising affordable flats for Church of England students. This residential provision contributes directly to the specific housing needs of the Borough.
- 6.15 The constraints of the site, the needs of the Church and community centre and the contribution of residential accommodation is considered to justify the departure from CS Policy DP1 requiring 50% of additional floorspace to be housing.

Sheltered Accommodation

- 6.16 Within Camden, young vulnerable people are identified as requiring housing support (Camden Core Strategy paragraph 6.48). The Ark's three self-contained flats for seven young people will contribute towards meeting this demand and ensure that some of the Borough's most vulnerable

people receive the help and support they need. The Ark will be run by St. Christopher's Fellowship in partnership with the Church.

- 6.17 By locating the accommodation within the Church building itself, the occupants have the opportunity to participate fully within the social life/activities of the local community and congregation. The Mayor's Housing SPG (2016), Camden Core Strategy Policy CS6 Development Policy DP8 and Draft Local Plan Policy H8 provide support for positively encouraging inclusive communities.
- 6.18 Occupants of the sheltered accommodation will benefit from the site's highly accessible location. A range of public transport options are situated within walking distance of the site. By locating sheltered accommodation within the Church at this location the proposal complies with Development Policy DP8.
- 6.19 St. Christopher's has confirmed that the accommodation does not need to be wheelchair accessible. There is no requirement within local planning policy to provide any accessible accommodation given that the proposal comprises less than 10 dwellings which are for hostel purposes.

Proposed Flats

- 6.20 Two flats (a one bed and a two bed) are proposed to provide affordable accommodation for Church of England students. At 49sqm and 71sqm (GIA), these exceed the minimum space standards as set by London Plan Policy 3.5. The two-bed flat would be wheelchair adaptable.

Flexible Uses

- 6.21 The internal arrangement of the building allows for the flexible use of spaces in accordance with Development Policy DP15. It is intended that the flexible use spaces will be used for the following:
- 1 Health and fitness for the local community
 - 2 Children's soft play
 - 3 Counselling and advice
 - 4 Arts and Crafts
 - 5 User-led self-help recovery groups
 - 6 Holy Trinity Church of England Primary School sports classes
 - 7 Youth Club 11-18
 - 8 Emergency Winter Night Shelter
 - 9 General local community hire at affordable rates.

- 6.22 The facilities provided would be accessible to all members of the community as well as offering services such as the café to passers-by, to accord with Core Strategy CS10, Development Policy DP15 and Draft Local Plan Policy C2.

Café

- 6.23 As noted within the Finchley Road/Swiss Cottage Town Centre SPG, development in the town centre should include a mixture of uses. The proposal involves the provision of flexible working spaces and a café unit.
- 6.24 The café unit constitutes an employment generating use that will assist in increasing the employment opportunities in the Borough in accordance Core Strategy Policy CS8 which

supports proposals that provide employment opportunities and develop skills in the local workforce.

- 6.25 Furthermore, Draft Policy TC5 promotes the provision of small shop premises for small and independent business. The small Café unit will run as a Social Enterprise Company Limited by Guarantee, with charitable status. This in turn would attract further footfall to the locality.

Design and Townscape

- 6.26 The vision for the redevelopment of the Church is set out within the Lighthouse Vision Video available to view at the following link: <http://www.thelighthousebuilding.org/lighthouse-video>. A full review of the design approach is set out in the Design and Access Statement. This includes townscape visualisations and a study of existing building heights. It also sets out the proposed materiality of the building. A summary is provided below.
- 6.27 The proposed development will extend up to six storeys (northern elevation) and step down to two storeys towards to eastern edge of the site. The height of the Church is considered acceptable in the context of the town centre when considering the height of the buildings within the surrounding context. Alban House to the east of the site is seven storeys, the approved development at 120 Finchley Road (adjoining the southern boundary of the site) extends from four storeys up to seven storeys and Lief House to the north comprises four storeys. Buildings aligning Finchley Road vary from two to seven storeys. Towards the rear, the building will step down to two storeys to maintain the outlook, privacy and amenity of Alban House. The building is therefore of a similar height to surrounding properties and at an appropriate scale, this complies with design policy DP24.
- 6.28 Furthermore the London Plan places a great importance on design and local character and within Policy 7.4, Local Character, it states development should have regard to the form, function and structure of an area as well as the scale, mass and orientation of surrounding buildings. The proposed façade would increase the prominence of the Church on the street, improving the streetscape and strengthening its important role as a community building. The café would introduce an active use at ground floor level and enliven the street frontage, a requirement of the Finchley Road/Swiss Cottage SPG.
- 6.29 The section of Finchley Road surrounding the site is highly varied in character and comprises buildings of different dates, materials and architectural styles. The design and materials of the Lighthouse introduce a high quality design which complements its immediate surrounds, in line with Camden's design standards (CPG 1 Design). The proposals will enhance the area's townscape and visual amenity; the proposals in particular would result in an enhancement of the views to the site from Finchley Road Tube Station. On this basis the development complies with the requirements of the London Plan and local policy (DP24 and Draft Policy D1) and guidance in particular paragraph 2.9 of CPG 1 regarding architecture and urban design.
- 6.30 An innovative approach has been taken to the design, resulting from the sustainability measures employed. On the front façade of the building the inclusion of the chimneys enables a sealed façade removing the acoustic and air quality issues associated with Finchley Road. Air is brought into each space sufficiently distant from the road to maintain air quality and avoid noise intrusion. Exposed thermal mass enables control of solar gains whilst optimising the thermal and solar parameters of the glazing and chimneys themselves provides ample daylight whilst minimising the risk of overheating. The solution provides passive ventilation for air quality, and avoidance of overheating, without recourse to the CO2 emissions associated with mechanical ventilation and embodied energy of plant. The chimneys provide an opportunity to create an abstract, symbolic facade, sitting comfortably within an active urban Finchley Road, yet establishing a strong sense of place and welcome. In accordance with paragraph 63 of the NPPF, *“great weight should be given to outstanding or innovative designs which help raise the*

standard of design more generally in the area.” Furthermore, paragraph 65 explicitly notes that buildings which promote high levels of sustainability should be supported as long as the proposals encapsulate good design.

- 6.31 Much discussion at pre-application stage has centred around the location of the façade. As a result of these discussions the façade has been set back by 260mm at ground and first floor. Justification has been provided (both in discussion and written form) as to why the façade cannot be set back further for design reasons. In essence, this is because it:
- 1 Creates an uncomfortable dead end “internal corner” junction with 120 Finchley Road
 - 2 Retaining an entrance setback from the main frontage would cut into the steep pedestrian pathway to the north preventing northwards movement
 - 3 The ground and first floor cannot be setback by 1m and remain connected to the ventilation chimneys above
 - 4 The tightly constrained core on the southwest corner would also be setback 1m and push the auditorium back by 1m also, consequently reducing the spaces to the rear of the building
- 6.32 As shown in the transport section below, there is no reason in terms of pedestrian comfort that would require the façade to be further set back.
- 6.33 In January 2017, the scheme was taken to a Design Review Panel (Chair’s Review). The team’s responses to these discussions are included at Appendix 5 and 6.

Secured by Design

- 6.34 The proposals accord to the principles of Secured by Design. In contrast to the existing building, the proposed building will be brought forwards to sit in line with adjacent properties ensuring that good enclosure and surveillance of Finchley Road occurs. With this approach there is no opportunity for ‘left over’ or unused spaces. The main entrance is located at street level on the northwest corner opposite the tube station and is set back from the pavement by 1.75m. The entrance is welcoming, light and transparent, and allows passers-by to view the form of the auditorium within. At the end of Stage 2 a Designing Out Crime Officer was consulted and provided the Architects with a security needs assessment. This will be implement where possible, within the constraints of the project

Impact on Heritage Assets and Surrounding Conservation Areas

- 6.35 The application site does not itself contain any listed building or structures, and the site is not in a Conservation Area. The site is situated within the settings of two conservation areas; the Fitzjohns Netherall Conservation Area and South Hampstead Conservation Area.
- 6.36 The proposed scheme will enhance the setting of the Conservation Areas through the redevelopment of an existing building of limited quality with one of high architectural merit. This accords to the requirements of London Plan Policy 7.8, Camden Core Strategy CS14, Development Policy DP25 and principles as set within Chapter Three of the CPG ‘Design’. The contemporary and innovative design demonstrates sensitivity to the surrounding context and serves to reinforce the presence of the important Church within the streetscape.

Transport

- 6.37 A full Transport Statement by Lime Transport including TRICS and a Pedestrian Comfort Survey based on TfL guidelines and spreadsheet (Pedestrian Comfort Guidance for London 2010), has been submitted as part of this application, together with a Travel Plan.

- 6.38 The site is highly accessible via a range of public transport options, including Finchley Road Station, Finchley Road & Frognal Station and is situated on a number of bus routes. The site has a PTAL of 6b (where 1 is least accessible and 6b is most accessible).
- 6.39 The proposed mix of uses accords with Camden Core Strategy Policy CS3 which specifically promotes the development of community facilities at accessible areas such as Finchley Road.
- 6.40 The existing footprint of the Church is set back 1m from the adjacent building frontages. The land in this area is owned by the Church and the paving is demarcated to indicate that this is not highway land. Initial discussions have been held with TfL regarding the status of this land and TfL has confirmed that its Property Asset Register shows that this land is outside the public highway. The design proposal aligns the Finchley Road façade with the adjacent properties, Lief House and 120 Finchley Road.
- 6.41 In terms of pedestrian comfort, in line with TfL guidance, Pedestrian Comfort Levels of A are considered comfortable for all areas and Pedestrian Comfort Level B+ is generally considered the recommended minimum for all areas. The Pedestrian Comfort Survey shows that based on peak flows, for the proposed design (with the reduced footway width) the minimum Pedestrian Comfort Level is A. The footway operates at this level in the existing situation and above the recommended level of pedestrian comfort of B+. It should also be noted that this is based on an occasional conference with maximum attendance, only 60% heading to the tube station and the conference start time coinciding with the busiest network pedestrian flows.
- 6.42 In the proposed situation, Pedestrian Comfort Levels for the average of maximum flows are no more than one level different from the comfort levels for the peak flows and are not lower than A.
- 6.43 It is therefore clear that realigning the building will not have a detrimental impact on Pedestrian Comfort Levels along the section of footway fronting Holy Trinity.
- 6.44 While the realignment of the building would reduce the width of the footway in front of the building, the available width would be consistent with the footway width either side of the site (approximately 3.7m) and will not, therefore, act as a constraint for pedestrian capacity along this route. As required by Core Strategy Policy CS11 and Draft Local Plan Policy T3, the Council should ensure that development does not remove or sever walking routes.
- 6.45 The construction of the new building and transport implications has been considered during the design process. The construction strategy for the proposed building addresses potential transport issues and proposed mitigation within the Construction Management Plan. The proposed movement of goods and materials conforms to Camden Development Policy DP20.

Car Parking

- 6.46 On the basis of the site's accessibility and town centre location, no car parking is proposed. The existing number of parking spaces (two) will be retained. The existing parking layout will be reconfigured to accommodate an electrical substation. As part of this reconfiguration a turning head/drop off bay for people with disabilities will be provided. In addition a parking space will be dedicated as a wheelchair accessible space for visitors on Sundays. This accords with Camden's Core Strategy as no additional vehicle parking has been provided on site.

Cycle Parking

- 6.47 The cycle parking provision is covered in detail in the Transport Statement. Based on the land use and staff numbers within the proposed development (as specified in the Transport Assessment) the London Plan requires six long stay cycle parking spaces and 20 short stay cycle

parking spaces. Camden development policies (CPG 7) require 10 long stay and eight short stay cycle parking spaces.

6.48 The scheme provides six long stay cycle storage spaces (two staff spaces and four residential spaces) via a double tier rack in a secure, weather-tight enclosure located next to the proposed substation at Sumpter Close. This store will be clearly visible from the rear entrance and signed.

6.49 In accordance with CPG 7, the long stay cycle parking is located in an accessible and secure location, clear of routes needed for pedestrian movement (Section 9).

6.50 To comply with CPG7 cycle standards, eight short term visitor cycle spaces are also provided. These are in two locations each comprising four single tier Josta stands. Should additional short stay parking spaces be required over and above the local plan requirements these could be located on the surrounding public highway. These will be used by members of the congregation on Sundays. As the spaces would not be used for the rest of the week, their location on private land would mean they are only partially used. Visitor spaces on public land (within the public highway opposite the site) for use by general commuters for the rest of the week would be more useful.

Amenity

6.51 Camden Core Strategy Policy CS5 and Emerging Local Plan Policy A1 seek to protect the amenity and quality of life of local communities by ensuring the impact of development on neighbours is fully considered by balancing the needs of development with the needs of the local community.

Outlook and privacy

6.52 The massing and design of the new building has responded to the proximity of surrounding buildings, most notably Alban House, to ensure the development has no adverse effects on amenity. This has been addressed by stepping the upper levels of the building away from adjoining windows, making full use of basement construction to minimise height and concentrating the mass of the new building on the street frontage rather than in the depth of the site. This approach accords to Core Strategy Policy CS1 (and emerging Local Plan Policy G1) as the scheme optimises the use of the site whilst taking into account the amenity of existing residents within the site's context.

6.53 Development Policy DP26 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, including the outlook from existing residential properties.

6.54 Camden Planning Guidance 6 (CPG 6) provides detailed guidance in relation to DP26 and states to ensure privacy there should be a minimum distance of 18m between the windows of habitable rooms that face each other. The guidance goes on to state where this standard (18m) is not met design measures to reduce the potential for overlooking and the loss of privacy should be implemented.

6.55 The existing distance between the closest walls of HTC and the residential floors of Alban House (first floor and above) is 18m, and the proposed distance is 10.3m as measured from the Lighthouse's second floor that has no windows facing Alban House (above this floor the building steps further away). The closest distance between facing windows is at the Lighthouse's third floor, which is proposed for office use. This distance is 18.2m from the windows of the Alban House apartments. The distance between the office windows and the edge of the Alban House balconies will be marginally less than 18m.

- 6.56 At first floor level the proposed building does include windows that face the ground floor of Alban House. One proposed window faces onto a light well and the other onto the path between Alban House and 120 Finchley Road, the result of which is that no habitable room windows within Alban House are affected. In any event, these proposed first floor level windows will be visually obscured through the use of etched glass or similar treatments to mitigate overlooking.
- 6.57 Screening is proposed at the fourth floor windows by the vertical aluminium fins set in front of them.
- 6.58 In terms of the terraces, screening is provided by the planter located against the residential terrace's balustrade on the east elevation at fifth floor level. In addition, due to the location of the plant enclosure, it is not possible for users at the third floor terrace to get physically closer than 14.5m to Alban House. A planter will be incorporated in the roof of the plant enclosure to provide screening.
- 6.59 Private views from flats are not protected by planning policy, but ensuring proposed buildings provide a high quality outlook is encouraged by planning policy. The proposed building has been carefully designed to ensure the rear elements provide an acceptable outlook.
- 6.60 The current outlook from Alban House is over the roof of the single storey Church building to Finchley Road. In the proposed scheme green roofs will be provided to ensure a high quality outlook. These will be located on the lower roof by Alban House, at second floor level, on the roof of the third floor plant enclosure, on the sixth floor roof over the residential, and on the roof of the roof top plant room. The increase in greenery and screening off of Finchley road by the church will offer a more tranquil outlook for Alban House. Durable and easily maintained materials will be used on the east elevations to ensure an enduring high quality appearance.
- 6.61 The scheme is in compliance with Camden's guidance and will ensure there is no unacceptable overlooking into the Alban House properties as a result of the proposed development.

Daylight and sunlight

- 6.62 A BRE daylight and sunlight assessment has been undertaken which establishes the effect of the proposed development on surrounding residential properties (Canfield House, St. Johns Court, Alban House and 120 Finchley Road)¹. The BRE assessment concludes that the overall daylight and sunlight effects of the proposed development upon the existing neighbouring residential properties follows the guidance and recommendations set out in the BRE Guidelines, and with a flexible and pragmatic application of the BRE guidelines in respect of the consented Hostel, given its intended transient use, the overall effect of the proposed development should be considered to be acceptable and accord with the intentions of the London Borough of Camden's planning policy CPG 6.

Noise and disturbance

- 6.63 In accordance with CPG 6, the implications of noise and disturbance have been considered from the beginning of the design process to enable prevention and mitigation measures to be designed into the scheme. The proposed scheme has been designed/orientated to reflect noise and protect existing residential uses, specifically Alban House. The stepping in massing from Finchley Road has ensured there is adequate distance between potential noise sources and noise sensitive buildings.

¹ Lief House has confirmed that there are no residential uses located within the building. Although, historically there was a residential component on the third floor of Lief House, this was not in existence when the British College of Osteopathic Medicine took ownership of the building in 1996. It was confirmed that the third floor is currently used as offices and exercise research space.

6.64 As part of the planning application a Noise Survey has been provided. This demonstrates the amenity of neighbouring occupiers (including the future occupiers of the supported residential accommodation and the student flats) will not be harmed by noise from fixed plant or from the building's intended use.

6.65 Further details regarding the management and control of different uses located within the Church is included within the Draft Building Uses/Management Plan.

Sustainability

Carbon Reduction

6.66 In terms of carbon reduction, the London Plan requires a 35% reduction of CO₂ emissions against Part L 2013 from (2013-2016) for all commercial developments. Where it is not possible to meet the 35% reduction in CO₂ emissions, a financial contribution is required.

6.67 LBC has confirmed that places of worship are exempt from the London Plan /Part L (see part L2A – Appendix C) carbon reduction requirements. Where the elements of the building that are not considered to be places of worship do not meet the 35% reduction requirement, a financial contribution will be required.

6.68 The accompanying Energy Statement has, therefore, omitted the auditorium (plus associated dimmer and control room) from the energy analysis. However, the team has strived to achieve compliance with Camden's energy requirements as far as practically and economically possible, across the remaining parts of the building.

6.69 The new church building is mixed use and has areas used for residential purposes on the 4th and 5th floor of the proposed building. The 4th floor residential element is being designed for hostel use, managed by the St. Christopher's Fellowship, and the 5th floor to be inhabited by Church of England students. For this reason, the 4th and 5th floor spaces are classed as integral parts of the Church facility, and have been included within the overall Part L energy assessment for the building, aiming to achieve the CO₂ reduction target for non-residential developments.

6.70 The energy strategy for the proposed new development follows the London Plan's energy hierarchy, which aims to promote a 'fabric first' approach to the reduction of CO₂ emissions. Therefore, improved fabric performance and building services system efficiencies have initially been considered following good practice as far as practically possible in order to reduce the energy demand. Following this, efficient energy sources have been considered both on and off-site. Subsequently, renewable energy sources have been considered to make-up as much of the 35% CO₂ improvement shortfall as practically possible. The final energy strategy for the building, after the energy hierarchy has been fully considered, shows that the building is able to achieve a 15% reduction in CO₂ emissions over Part L 2013. This is below the 35% target set out in the London Plan. The building has an annual CO₂ emissions shortfall of 8.1 tonnes/year.

6.71 Despite the fact that all design measures have been investigated, it has been concluded that there are no further energy efficiency measures which are economically and practically feasible for the proposed building. The scheme is therefore unable to meet the 35% target in energy reduction.

Place of Worship

6.72 There is no definition in the London Plan on what is considered a place of worship. The Church has prepared a report (see Appendix 4) to demonstrate why the Lighthouse is a place of Worship. As demonstrated in this report, HTC considers the whole building is a place of worship due to the ethos of the inclusive community approach. This was discussed with LBC during the pre-application process, for their agreement. However, LBC has confirmed that is that it is only

the auditorium that should be classed as the place of worship to be exempt from an energy assessment.

BREEAM

- 6.73 In terms of BREEAM, CPG 3 and DP22 requires 500sq m or more of non-residential floor space to meet BREEAM Excellent rating.
- 6.74 The Pre-Assessment (appended to the Sustainability Statement) has confirmed that the proposed Church has the potential to achieve a score of 76.58% which equates to an Excellent BREEAM rating. This provides a comfortable buffer over the target score of 70% (the threshold for an Excellent rating). This accords to Development Policy DP22.
- 6.75 The proposed scheme includes provision for a 313sqm low nutrient biodiverse green roof, which demonstrates the highest feasible and viable sustainability standards in line with the London Plan Policy 5.11.

Basements

- 6.76 The proposals include a lower ground level area, which does not constitute a full height basement. The Basement Impact Assessment (BIA) forms part of the Construction Management plan submitted with this application and does not indicated any concerns with regard to the effects of the proposed basement on the site and the surrounding area. It concludes that the impacts identified can be mitigated by appropriate design and standard construction practice. This complies with the Camden's Planning Guidance as set within CPG4.
- 6.77 The Construction Management Plan also includes a Flood Risk Assessment and Surface Water Drainage Statement. The scheme does not give rise to any issues in relation to flood risk or surface water drainage.

CIL and Planning Obligations

CIL

- 6.78 CIL applies to all proposals which add more than 100sqm of new floorspace. The application site is situated within Camden Zone C CIL Charging Schedule.
- 6.79 In accordance with Annex 2 of the Community Infrastructure Levy Charging Schedule – Mayor of London (2012), the development will be exempt from Mayoral CIL as it is constitutes:
- 6.80 'Development by charities of their own land for their charitable purposes'
- 6.81 GLA has advised (via email in November 2015) that, with regards to Mayoral CIL, the determination of CIL liability rests with the collecting authority and not with the Mayor. It stated "*Regulation 43 of the CIL Regulations exempts development by a charity for their charitable purposes from CIL*".
- 6.82 Considering Regulation 43 of the CIL Regulations which exempts development by a charity for their charitable purposes alongside Camden's CIL charging schedule which states charity/community uses have a zero tariff, it is concluded that the scheme is exempt from both Mayoral and Camden CIL. As has been set out within this application, all the proposed floorspace is to be used by the Church, for the Church. The Church is not seeking to gain profit from the uses from a third party use of any floor space. As requested, the Charity Relief Form has been completed to show that the floorspace is to be used solely by the Charity.

Planning Obligations

- 6.83 When considering the guidance noted in CPG 8 Planning Obligations, it is anticipated the proposal will likely to be required to make a financial contribution towards the provision of a number of areas. This has been confirmed with LBC officers who have suggested the following obligations may be required:
- Construction and demolition management plan (a draft is submitted with the application)
 - Car-free development
 - Housing for vulnerable users
 - Highways contribution for reinstatement of highway/paving
 - Open space contribution
 - Local pedestrian and environmental improvements
 - Service management plan
 - Travel plan
 - Building/uses management plan
 - BREEAM Excellent
 - Affordable access to community facilities
- 6.84 For the purposes of a S106 agreement, the details of the Church's solicitors can be provided on request by LBC.

7.0 **Summary and Conclusion**

7.1 This Planning Statement provides a detailed assessment of the redevelopment of Holy Trinity Church, Finchley Road in relation to national, strategic and local planning policy and guidance. The development will deliver a wide range of planning, regeneration and community benefits. These are summarised below:

- 1 The proposal is for a place of worship with a range of community facilities. The site's close proximity to Finchley Road High Street, public transport, residential properties and other community facilities mean the site will be highly accessible and well used by the local community.
- 2 The mix of uses and provision of flexible spaces offer the opportunity for community meetings and functions as well as impromptu visits/gatherings in spaces such as the café area. Such activities and opportunities encourage a socially inclusive, sustainable community. The uses within the scheme are intrinsic to meeting the needs and desires of both the Church and local community and ensuring the long term future of the congregation.
- 3 The provision of accommodation for vulnerable young people contributes towards the demand within the Borough and provides accommodation within a safe and inclusive environment in which occupants can connect with the local community.
- 4 The architectural quality of the building will enhance the townscape quality, views from Finchley Road Tube Station and the setting of Fitzjohns Netherall and South Hampstead Conservation Areas.

7.2 It is concluded that the proposed development embodies the principles of sustainable development promoted through the NPPF, it complies with the objectives and requirements of the development plan, emerging policy and it is acceptable with regards to all other material considerations.

Appendix 1: **Summary of Consultation**

Holy Trinity Lighthouse: Community Consultation

Introduction

The following gives an overview of the different aspects of community consultation that have informed and responded to the planning application

Summer 2013 Early community consultation and community audit.

During the summer of 2013, the church conducted a Community Audit under the auspices of Craigmyle Consultants aimed at understanding the community's needs, gauging attitudes of the community toward the church and to understand gaps in provision of helping services.

200 people completed a survey form. The people were drawn roughly equally from the church congregation and the community and included those who used the church's Red Sky Café, operational at the time; parents of children attending Holy Trinity School; parents supported through the church's community work, and people met on the street.

Community contacts identified the following five most key issues:

- Young people not in education, employment or training
- Mental health/ depression
- Loneliness
- Unemployment/low income
- Addiction

Community contacts want the church to provide:

- A homeless shelter in winter
- Support for the elderly
- Bereavement support
- Mentoring activities and support for young people
- Activities and clubs for children and young people
- Help and prayer for the lonely and depressed.

77% of the community contacts said that they valued the presence of HTSC church on the Finchley Road. Nearly all want the church to be involved in providing care and support to the community.

2013 and 2016 Community Audits;

Analysis of the following documents supported the findings of the community consultation in identifying local need:

- Camden's Joint Strategic Needs Assessment 2014-15;
 - Camden Character Study 2015;
 - Camden's Joint Health and Wellbeing Strategy (2016)
 - The Camden Plan 2012-17
 - Camden Safer Streets Team reports
 - The London Poverty Profile
 - Youth unemployment: the crisis we cannot afford. ACEVO 2012
 - The London Plan
-

The audit provided the evidence of need that has contributed to the Lighthouse plans to provide services that respond to the effects of poverty, childhood and adult obesity, isolation and loneliness, homelessness, youth unemployment, long term poor physical and mental health in the population, the needs of young people from disadvantaged backgrounds, levels and the effect of child sexual exploitation and indices of multiple deprivation in areas adjacent or close to the proposed Lighthouse development. Sources and further details are available on request.

2015

30 November Lief House, College of Osteopathic Medicine

Meeting with Principal and Estates and Facilities Manager of Lief House, British College of Osteopathic Medicine, 3 Sumpter Close. Explanation of outline plans and discussion how Lief House could make use of the proposed performance space for graduation ceremonies and students use Café. Generally positive response from the College.

15 December Alban House Management Committee

Meeting between Andy Keighley and Tim Keightley from the church, with David McMillan and Ed Robson of the Alban House Management Committee to give an update of project progress.

2016

8 January Alban House Management Committee

Met with Ed Robson, representative of the Alban House Management Committee. I explained the outline drawings that I had previously emailed through. I offered to meet the Management Committee to talk through the church's intentions.

19 January Alban House Management Committee

Met with Ed Robson of the Alban House Management Committee to discuss the route of the Right of Way currently alongside the south boundary of the church land.

Early July (Precise date uncertain) Alban House Management Committee

Hosted a meeting of the Alban House Management Committee (five members attended) to talk through the plans and to view the right of way to the rear of and alongside the church.

12 and 13 July Leafleting the area

500 leaflets distributed to surrounding residences and businesses, including each flat of Alban House which is the closest dwelling to the church, inviting members of the public and business leaders to attend the Public Consultation 20 July 2016.

13 July Ward Councillors

Emailed nine Ward Councillors notifying them of and inviting them to the Consultation evening. Followed this up on 14 July with a summary document of the Lighthouse Project for their own information and for passing on to relevant neighbourhood associations.

20 July open Evening

Open Evening hosted at the church; run by the church with the support of the church's representatives; Tandem Projects and Haworth Tompkins Architects to present the church's aspirations to their neighbours and the wider community

- Approx. 20 - 30 people attended from surrounding residences. These included representatives from both Lief and Alban house, the church's direct neighbours and on whom the development will have the greatest impact.
- Lief House were supportive of the proposed plans and the benefits the new development will have on the college.
- Alban House were understandably wary and concerned about any impacts on themselves. It was agreed that further meetings would be undertaken with residents and the management board to ensure they are kept up to date with the project's developments.
- Of the other attendees, there was a generally positive response especially in regards to what the project was proposing to deliver for the community although there were some mixed feelings towards size and architecture.
- 6 attendees provided a written response. These were supportive of the project and agreed that the mixed-use facilities would benefit the local community. 5 out of 6 were supportive of the architecture.

6, 13 and 20 November: consultations with members of the community who attend, use or visit the church on a Sunday and/or during the week.

63 people attended over the three events. Verbal feedback was wholly positive.

11 November Correspondence with Alban House Management Committee

Sent letter by email responding to enquiries raised by the Alban House Management committee by email in July and August 2016

22 November Ward Councillor

Met with Gio Spinella, Ward Councillor, to provide an overview of the plans and summary of intended building use and to take advice about the consultation process

23 November Ward Councillor

Met with Siobhan Baillie, Ward Councillor, to provide an overview of the plans and summary of intended building use and to take advice about the consultation process

24 November The West Hampstead Neighbourhood Development Forum replied to an introductory email requesting summary information rather than a meeting and will get back should the forum have any questions.

25 November The Redington Froggnal Neighbourhood Association replied to an introductory email stating they did not wish to meet or receive information as the proposed development is outside their area of responsibility.

28 November Netherfield Neighbourhood Association

Following introductory emails, met with Linda and Stephen Williams of the Netherfield Neighbourhood Association to show the plans and a summary document of activity. They intend to discuss the application at their committee meeting in January 2017. Feedback on the day was the building design is 'interesting' and that they could see no reason to object to the scheme.

28 November Alban House Management Committee met with Ed and David of the Management Committee accompanied by Will Lingard of Turley Planning with Dan Lynch

of Tandem Projects, Andy Keighley, vicar of Holy Trinity and Tim Keightley, Executive Director.

The meeting was a detailed review of the planning drawings and of the planning timetable.

Feedback yet to be forthcoming.

28 November Combined Residents' Associations of South Hampstead Met with Peter Symonds Chair of the Association to provide an overview of the plans, a summary of intended building use and of the planning application timeline. Feedback on the day was very supportive. The Chair expressed a willingness to write a letter in support of the application.

Tim Keightley
Executive Director
The Lighthouse
November 2016

Appendix 2: Overview of NPPF Policies Relevant to the Application

The NPPF states that the purpose of the planning system is “to contribute to the achievement of sustainable development” (para 6). Paragraph 7 sets out the three dimensions of sustainable development:

‘Economic’ in contributing to a strong and competitive economy;

‘Social’ in supporting strong communities; and

‘Environmental’ in protecting and enhancing the environment.

Under the NPPF it is essential for decision-making authorities to support applications for sustainable development wherever possible and without delay. Paragraph 14 of the NPPF establishes a presumption in favour of sustainable development. It states:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For decision-taking this means approved 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 in the Framework taken as a whole; or

Specific policies in this Framework indicate development should be restricted.”

The NPPF Core Planning Principles (para 17) include:

“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.”

In relation to town centres in particular, paragraph 23 requires local planning authorities to recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. By extension, paragraph 69 states that planning decisions should aim to achieve places which promote:

“Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use development, strong neighbourhood centres and active street frontages.”

Paragraph 56 outlines the importance attached to the design of the built environment. Development should help to create a strong sense of place, respond to local character and history and create safe and accessible environments. Paragraph 61 states that planning policies and decisions should address the connections between people and places and integrate new development into the natural, built and historic environment.

Paragraph 70 seeks the delivery of the social, recreational and cultural facilities and services the community needs and promotes positive planning for the provision of community facilities and other local services which will enhance the sustainability of communities and residential environments. Planning policies and decisions should ensure that established facilities are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.

Appendix 3: **Policy Matrix**

Topic	London Plan (2015) and Mayor's SPGs	Camden Core Strategy (2010)	Camden Development Policies (2010)	DRAFT Camden Local Plan (2016)	Camden Planning Guidance
<p>Mixed Use within Redevelopment within Town Centres</p>	<p>Policy 2.15 Town Centres The Mayor recognises the changing nature of the role of Town Centres and supports and encourages the provision of a wider range of services within them; promoting diversification through the form of mixed use re-development.</p> <p>Policy 4.6 Support for and Enhancement of Arts, Culture, Sport and Entertainment Developments should: Be located on sites where there is good access to public transport; Be accessible to all sections of the community, including disabled and older people; and Address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities.</p> <p>Policy 4.7 Retail and Town</p>	<p>Policy CS1 Distribution of Growth Appropriate development is encouraged in highly accessible locations – including Finchley Road.</p> <p>The Council will promote the most efficient use of land and building in Camden by: Seeking development that makes full use of the site; Expect high density development located high accessibility locations; Expecting the provision of a mix of uses in suitable schemes, in particular the most accessible parts of the borough including an element of housing where possible.</p> <p>Policy CS7 Promoting Camden's Centres and Shops Promote successful and vibrant centres by enhancing the role and unique character,</p>	<p>Policy DP1 Mixed Use Development Within Finchley Road/Swiss Cottage Town Centre where an additional 200sqm additional floorspace is provided, it is required 50% of additional floorspace to be housing unless: When secondary uses are deemed incompatible with the character of the primary use the 50% of additional floorspace is not required to be provided as long as it is sufficiently justified.</p> <p>Policy DP12 Supporting Strong Centres and Managing the Impact of Food, Drink, Entertainment and Other Town Centre Uses Development of entertainment and other town centre uses should not cause harm to the character, function, vitality and viability of the local</p>	<p>Policy A1 Managing the Impact of Development Permission will only be granted for developments that do not cause harm to amenity. New development should contribute towards the creation of strong and successful communities by balancing the needs of the development with the needs and characteristics of local areas and communities. Development proposals should consider: Visual privacy, overlooking, overshadowing, outlook; Sunlight and daylight; Artificial lighting levels; Impact on transport networks; Appropriate attenuation measures; Noise and Vibration Levels; Odour, fumes and dust; Microclimate; and Contaminated land</p> <p>Policy G1 Delivery and Location of Growth Proposals should make full use of the site, taking into account quality of design, surroundings, sustainability, amenity, heritage,</p>	<p>Finchley Road/Swiss Cottage SPG Para 3.12 Proposals including entertainment uses will be assessed upon the potential impacts on local amenity, the character and function of the area and its overall mix of uses. Planning permission will not be granted if proposals are likely to generate harmful impacts.</p> <p>Para 3.14 Conditions and legal agreements where needed will make sure the premises are designed, operated and managed in a way that does not cause harm to the area.</p> <p>All applications for entertainment uses will be assessed on a case by case basis subject to the above, consideration should also be given to: The proximity to local residents;</p>

Topic	London Plan (2015) and Mayor's SPGs	Camden Core Strategy (2010)	Camden Development Policies (2010)	DRAFT Camden Local Plan (2016)	Camden Planning Guidance
	<p>Centre Development The Mayor supports increased capacity for retail, commercial, culture and leisure development within town centre centres.</p> <p><u>Town Centres SPG (2014)</u> SPG Implementation 1.2 - Arts, Culture, Leisure and the Night Time Economy Encourages the integration of culture, creativity and good design into the built environment, having regard to those areas deficient in cultural provision.</p>	<p>providing for a range of services including entertainment and other suitable uses to provide variety, vibrancy and choice, ensuring no harmful impact on residents and the local area. (Page 28) In Finchley Road in particular the Council will promote enhancements to the local environment.</p> <p>Policy CS8 Promoting a Successful and Inclusive Camden Economy The Council recognise the importance of 'other' employment generating uses. (Including tourism).</p>	<p>area or the amenity of the neighbours. Planning conditions and obligations will secure the hours of operation, noise creation, the expansion of the customer are into ancillary areas, the use of local management agreements to ensure the premises are managed responsibly to minimise impact on surroundings.</p>	<p>transport accessibility and any other relevant considerations. A provision of mixed uses is expected in accessible areas of the borough; including an element of residential where possible. Appropriate development will be promoted in town centres (including Finchley Road).</p> <p>Policy E1 Economic Development Camden recognises the importance of 'other' employment generating uses such as culture, leisure and entertainment.</p> <p>Policy TC2 Camden's Centres and Other Shopping Areas Food, drink, entertainment and other town centre use should not have a harmful impact on residents and the local area; such uses should be focussed within Town Centres (including Finchley Road).</p> <p>Policy TC4 Food, Drink, Entertainment and Other Town Centre Uses Development of shopping, services, food drink, entertainment and</p>	<p>Proposed opening hours; Likely impacts caused by fumes noise and vibration created on the premises; Light spill; Effect upon function the centre and likely impact on use of public transport, transport congestion and stopping and dropping off blocking pavements; and impact of any increase in Likely the size of the premises or the change of nature of activities</p> <p>CPG 5 Town Centres, Retail and Employment SPG (2013) Section 3 Camden will control food, drink and entertainment uses to ensure that town centres are balanced and vibrant as well as ensuring that these uses do not harm the amenity of local residents and businesses. They also seek a mixture of suitable uses within our town centres as well as a variety of uses in each</p>

Topic	London Plan (2015) and Mayor's SPGs	Camden Core Strategy (2010)	Camden Development Policies (2010)	DRAFT Camden Local Plan (2016)	Camden Planning Guidance
				<p>other town centre uses should not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.</p> <p>The Council will consider:</p> <ul style="list-style-type: none"> the effect of development on shopping provision and the character of the centre in which it is located; the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and non- implemented planning permissions, and any record of harm caused by such uses; the impact of the development on nearby residential uses and amenity, and any prejudice to future residential development; parking, stopping and servicing and the effect of the development on ease of movement on the footpath; noise and vibration generated either inside or outside of the site; fumes likely to be generated and the potential for effective and no obtrusive ventilation; The potential for crime and antisocial behaviour, including 	<p>frontage.</p> <p>Section 6</p> <p>Such uses should be located in areas where their impact can be minimised. Planning conditions and legal agreements will be used to control the impact of food, drink and entertainment uses</p>

Topic	London Plan (2015) and Mayor's SPGs	Camden Core Strategy (2010)	Camden Development Policies (2010)	DRAFT Camden Local Plan (2016)	Camden Planning Guidance
				<p>littering.</p> <p>To manage potential harm to amenity or the local area, we will, in appropriate cases, use planning conditions and obligations (Please refer to Planning Obligations section, page 14 for further detailing).</p> <p>Policy TC5 Small and Independent Shops</p> <p>The Council will promote the provision of small shop premises suitable for small and independent businesses.</p>	
Community, Leisure and Entertainment	<p>Policy 3.1 Ensuring Equal Life Chances for All</p> <p>Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities.</p> <p>Policy 3.16 Protection and Enhancement of Social Infrastructure</p> <p>Facilities should be accessible to all sections of the community and located within easy reach by</p>	<p>Policy CS10 Supporting Community Facilities and Services</p> <p>A range of community facilities to support the growing population in Camden are supported by the Council.</p> <p>There is support for the retention and enhancement of existing community, leisure and cultural facilities.</p> <p>The Council will facilitate</p>	<p>Policy DP15 Community and Leisure Uses</p> <p>Suitable developments should make rooms available for the community to hire at a discounted rate, particularly where a development replaces an existing community facility.</p> <p>New community and leisure facilities should be accessible by a range of transport modes and located in Town Centres (such as Finchley Road).</p>	<p>Policy C1 Improving and Promoting Camden's Health and Well-being</p> <p>Proposals for major development schemes are required to include a Health Impact Assessment (HIA) or checklist.</p> <p>Policy C2 Community Facilities</p> <p>The Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of the community and reflect new approaches to the delivery of services.</p> <p>The Council require development</p>	<p>CPG 6 Amenity</p> <p>Chapter 11 Open Space, Outdoor Sport and Recreation Facilities</p> <p>Para 11.3 Developments of 500sqm or more of any floorspace are likely to increase the resident, worker or visitor populations of the borough maybe required to contribute to open space provision.</p> <p>Para 11.33 The Council may agree to accept</p>

Topic	London Plan (2015) and Mayor's SPGs	Camden Core Strategy (2010)	Camden Development Policies (2010)	DRAFT Camden Local Plan (2016)	Camden Planning Guidance
	<p>walking, cycling and public transport. Wherever possible, the multiple-use of premises should be encouraged.</p> <p><u>Social Infrastructure SPG</u> Chapter 9 – Community Facilities Chapter 9 advises on planning for community facilities suggesting that the development, protection and enhancement of community facilities by definition should be community-led. Reference should be made to this chapter for more detail regarding planning and managing community facilities.</p>	<p>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.</p> <p>Para 10.2 The Council will seek to support community organisations and religious groups to help them meet their need for faith facilities.</p> <p>Para 10.18 Developments are expected to make commensurate provision for new or improvements to existing facilities, in order to meet the demand for community facilities.</p> <p>Para 10.21 Grouping facilities in a single location makes efficient use of land.</p>	<p>New community facilities must be provided in buildings which are flexible and sited to maximise the shared use of premises.</p> <p>Policy DP30 Provision of, and Improvement to, Open Space and Outdoor Sport and Recreation Facilities Permission will only be granted for development that is likely to lead to an increased use of public open space when an appropriate contribution to the supply of open space is made.</p>	<p>that increases the demand for community facilities and services to make appropriate contributions towards enhancing existing provision.</p> <p>Developers proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements.</p> <p>Facilities should provide access to a service on foot and by sustainable modes of travel.</p> <p>Multi-purpose community facilities should be accessible to the wider community</p> <p>Inclusion measures should address the needs of the community and foster community integration.</p> <p>Existing community facilities should be retained, to preserve the benefit to the community, unless a replacement facility of a similar nature is provided.</p> <p>Policy C3 Cultural and Leisure Facilities The Council seek opportunities for new shared-use/extended access, cultural and leisure facilities. The</p>	<p>financial contributions in place of direct provision of new public open space where the development site is too small to incorporate on-site open space.</p>

Topic	London Plan (2015) and Mayor's SPGs	Camden Core Strategy (2010)	Camden Development Policies (2010)	DRAFT Camden Local Plan (2016)	Camden Planning Guidance
				<p>expansion of existing provision should be located in accessible locations, such as Town Centres.</p> <p>Policy A2 Open Space An appropriate mix of green infrastructure across proposed developments should provide amenity space, biodiversity enhancements, mitigate and adapt to climate change.</p>	
<p>Housing Provision (Vulnerable People)</p>	<p>Policy 3.5 Quality and Design of Housing Developments Detailed 'Minimum Space Standards' can be found in Policy 3.5 and should be referred to throughout the planning and design process.</p> <p>A 1 person dwelling should have a minimum space standard of 37 GIA (sqm).</p> <p>Housing SPG (2016) Specialist Accommodation for Older People, Vulnerable People and Employees Residential accommodation</p>	<p>Policy CS6 Providing Quality Homes The Council aims to minimise social polarisation and create inclusive communities by seeking a variety of house types suitable for different groups including vulnerable people; priority to development that provides affordable housing and housing for vulnerable people will be given.</p>	<p>Policy DP8 Accommodation for Homeless People and Vulnerable People The Council support the provision of accommodation for vulnerable people provided that: Its suitable for intended occupiers; and Accessible to public transport and community facilities and contributes to creating a mixed and inclusive community.</p> <p>Para 8.9 & 8.10 Where appropriate the Council will use conditions/legal</p>	<p>Policy H8 Housing for Older People, Homeless People and Vulnerable People Housing for vulnerable people is supported provided that the development is: Suitable for intended occupiers in terms of standard of facilities, the level of independence and the provision of support; Accessible to public transport, shops and community facilities; Contributes to creating a mixed, inclusive community, and Does not cause harm to nearby residential amenity.</p>	<p>CPG 1 Housing (2015) Para 2.30 The Council may need to consider controlling the affordability of housing for vulnerable people; this will be done on a case by case basis.</p> <p>Para 3.8 The Council will consider the suitability of any site for alternative housing (including vulnerable housing provision).</p> <p>The CPG 1 Housing supports the Policy DP8 as set out in the Development Policies.</p>

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	for vulnerable people and provision for employees are important forms of housing that should be positively supported (page 140).		agreements to control the management of housing for people with support needs, and to specify the group that it is intended to support.		
Conservation Areas/ Heritage	<p>Policy 7.8: Heritage Assets and Archaeology Development affecting heritage assets/conservation areas and their settings should conserve their significance, being sympathetic to form, scale, materials and detail.</p> <p>Policy 7.9: Heritage-Led Regeneration Schemes should be designed so to recognise the significance of heritage assets in their own right and as a catalyst for regeneration.</p>	<p>Policy CS14 Promoting High Quality Places and Conserving Heritage Development should be of high quality design that respects the local context and character. The setting of heritage assets, conservations areas and listed buildings should be preserved and enhanced. High standards of access in all buildings; schemes should be designed to be inclusive and accessible Locally important views should be protected.</p>	<p>Policy DP25 Conserving Camden's Heritage Development outside of a conservation area that causes harm to the character and appearance of that conservation will not be permitted.</p>	<p>Policy D2 Heritage Development which causes harm to the significance of a conservation area/s will not be permitted unless there are public benefits to the development that outweigh that harm, taking into consideration the scale and harm of the significance of the asset. Development outside of a conservation area will be resisted if it causes harm to the character or appearance of a conservation area.</p>	<p>CP1 Design Chapter 3 Heritage Development proposals should consider the impact they will have upon the setting of conservation areas.</p>
Design and Site Layout	<p>Policy 7.2 An Inclusive Environment Design and access statements should explain how, following engagement</p>	<p>Policy CS17 Making Camden a Safer Place Developments should demonstrate that they have incorporated design</p>	<p>Policy DP24 Securing High Quality Design Developments should be of the highest standard of design, giving consideration</p>	<p>Policy D1 Design Development should be of the highest architectural and urban design quality which improves the function, appearance and the</p>	<p>CPG 1 Design Para 2.9 Good design should: Positively enhance the character, history and</p>

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	<p>with relevant user groups, principles of inclusive design, including the specific needs of older and disabled people, have been incorporated into the proposals, whether relevant best practice standards have been complied with and how inclusion will be maintained and managed.</p> <p>Policy 7.3: Designing Out Crime Developments should reduce the opportunities for criminal behaviour and contribute to a sense of security.</p> <p>Policy 7.4: Local Character Buildings, streets and open spaces should be of a high quality design that has regard to the existing, creates a positive relationship between structure and landscape, of human scale, informed by the historic environment and characterised by its</p>	<p>principles which contribute to community safety and security.</p>	<p>to:</p> <p>The character, setting, context and the form and scale of neighbouring buildings;</p> <p>The quality of materials to be used;</p> <p>The provision of visually interesting frontages at street level;</p> <p>Appropriate location for building services equipment;</p> <p>Existing natural features;</p> <p>The provision of hard and soft landscaping including boundary treatments;</p> <p>Amenity space provision; and</p> <p>Accessibility.</p> <p>Policy DP26 Managing the Impact of Development on Occupiers and Neighbours Permission will only be granted for developments that don’t cause harm to amenity.</p> <p>Factors considered include: Visual privacy and</p>	<p>character of the area.</p> <p>Development is required to be</p> <p>Respect local context and character;</p> <p>Preserve or enhance the historic environment and heritage assets;</p> <p>Sustainable, durable and adaptable to different activities and land uses;</p> <p>Comprises detailing and materials that complement the local character;</p> <p>Sustainable in design and construction;</p> <p>Promotes health;</p> <p>Improves movement through the area with direct, accessible and legibility;</p> <p>Secure and designed to minimise crime;</p> <p>Robust and flexible in use;</p> <p>Responds to natural features;</p> <p>Incorporated outdoor amenity space;</p> <p>Preserves significant views; and</p> <p>Carefully integrates building services and equipment.</p> <p>Policy C4 Safety and Security Developments should demonstrate that they have incorporated design</p>	<p>nature of surrounding existing buildings;</p> <p>Consider connectivity to and from it;</p> <p>Ensure new buildings do not significantly overshadow or overlook surrounding buildings and spaces;</p> <p>Consider the impact the development will have upon views – ensure to provide visual interest;</p> <p>Overlook the street with appropriate active frontages;</p> <p>Provide clear indication of building use;</p> <p>Material palette that relates to the character and appearance of the area; and</p> <p>The spaces around a new development should be considered at the same time as the actual development hard/soft landscaping and boundary treatments should be considered as part of wider cohesive design.</p>

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	<p>surroundings.</p> <p>Policy 7.5 Public Realm The design of the public realm should be; comprehensible at a human scale and use gateways, focal points and landmarks as appropriate. Please refer to policy for detailing relating to landscape treatments, street furniture, local infrastructures and the public realm.</p> <p>Policy 7.6 Architecture Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. Incorporating the highest quality materials and design appropriate to its context. Policy 7.6 lists criteria for the design of buildings and structures which should be considered in detail throughout the design process.</p>		<p>overlooking; Overshadowing and outlook; Sunlight/day light levels; Noise and Vibration levels; Odour, fumes and dust; Microclimate; and Inclusion of attenuation measures.</p> <p>Developments should also provide: An acceptable standard of accommodation in terms of internal arrangements; Storage (including bicycle storage), recycling and waste facilities; and Outdoor space</p> <p>Policy DP29 Improving Access Building and places are expected to meet the highest practicable standards of access and inclusion Buildings and spaces intended for public uses should be designed to be as accessible as possible.</p>	<p>principles which contribute to community safety and security. Active frontages should be incorporated where possible as a means of reducing crime.</p>	<p>Para 2.23 Design and Access Statement will be required to accompany the application.</p> <p>Chapter 6 Landscape Design Para 6.4 Landscape design and the provision of green infrastructure should be fully integrated into the design of the development proposals from the beginning of the design process. Chapter 9 Designing Safer Environments Para 9.6 Security features should be considered early in the design process consideration for example the provision of active frontages.</p> <p>CPG 7 Transport Section 8 Streets and Public Spaces New development should contribute to the creation of attractive, clean and</p>

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	<p><u>Town Centres SPG (2014)</u> SPG Implementation 3.1 Public Realm Proposals should: Take a wider approach to street design, drawing on the 'Better Streets' toolkit Improved the public realm Enhance environmental quality; and Promote safe design.</p>		Spaces between buildings should be fully accessible.		well-maintained public places.
Basements		Camden's approach to basements is contained in the Development Policies (DP27).	<p>Policy DP27 Basements and Lightwells Development proposing basement provision is required to submit an assessment of the schemes impact on drainage, flooding, groundwater conditions and structural stability, where appropriate.</p> <p>The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground</p>	<p>Policy A5 Basements Permission for basements will only be granted if the proposals would not cause harm to: Neighbouring properties; The structural, ground, or water conditions of the area; The character and amenity of the area; and The significance of heritage assets.</p> <p>In determining proposals for basements the Council will require a Basement Impact Assessment and where appropriate a Basement Construction Plan. Basement development should not comprise of more than one storey.</p>	<p>CPG4 Basements and Lightwells Para 2 Basements/underground development will only be permitted if they cause no harm to the built and natural environment and local amenity.</p> <p>Para 3.2 A Basement Impact Assessment (BIA) specific to the site is required to be submitted and should contain the following sections:</p>

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			instability.	<p>Applicants need to demonstrate that proposals for basements:</p> <ul style="list-style-type: none"> 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; Do not harm the structural stability of the host building or neighbouring or water environment in the local area; Avoid cumulative impacts Do not harm the amenity of neighbours; Do not lead to the loss of townscape or amenity value; Provide satisfactory landscaping, including adequate soil depth; and Do not harm the appearance or setting of the building or the established character of the surrounding area. 	<p>Screening; Scoping; Site Investigations and Study; Impact Assessment; and Review and Decision Making².</p>
Transport, Accessibility and Parking	<p>Policy 6.1 Strategic Approach Specifics the Mayor will use a strategic approach to</p>	<p>Policy CS 3 Other Highly Accessible Areas The Council will promote development in the highly</p>	<p>Policy DP16 The Transport Implications of Development Development should be</p>	<p>Policy C6 Access for All Development should meet the highest practicable standards of accessible and inclusive design.</p>	<p>CPG 7 Transport Section 5 Car Free Development Para 5.0 Car free</p>

² Detailing of sections required to be included within the Basement Impact Assessment can be found in Section 3 of CPA 4 Basements and Light, page 14- 34.

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	<p>better integrate transport and development proposals.</p> <p>Policy 6.3: Assessing Effects of Development on Transport Capacity Proposals should assess the impacts on transport capacity and network at corridor and local level. Transport Assessments will be required in accordance with TfL’s guidance.</p> <p>Policy 6.4 Enhancing London’s Transport Connectivity Development opportunities that relate to locations that will benefit from increased public transport accessibility will be supported.</p> <p>Policy 6.9 Cycling Developments should provide secure, integrated and accessible parking facilities in accordance with minimum standards,</p>	<p>accessible areas of Finchley Road. Finchley Road is considered to be a suitable location for the provision of homes, shops, food, entertainment uses, offices, community facilities and is particularly suitable for uses that are likely to significantly increase the demand for travel.</p> <p>Policy CS11 Promoting Sustainable and Efficient Travel The Council will protect existing routes for walking.</p>	<p>properly integrated with the transport network and supported by adequate walking, cycling and public transport links.</p> <p>Policy DP17 Walking, Cycling and Public Transport Walking, cycling and public transport use should be promoted. Convenient, safe and well-signalled routes including footways and cycleways should be designed to appropriate widths.</p> <p>Policy DP18 Parking Standards and Limiting the Availability of Car Parking Developments with Town Centres (including Finchley Road) are expected to be car free. Developments will also be expected to meet the Council’s minimum standards for cycle parking.</p> <p>Policy DP20 Movement of</p>	<p>Facilities should be located in the most accessible parts of the borough and encourage access to public transport.</p> <p>Policy T1 Prioritising Walking, Cycling and Public Transport In order to promote walking in the borough, the Council will seek to ensure developments: Improve the pedestrian environment; Are permeable; Adequately lit; and Provide high quality footpaths that are wide enough for the number of people expected to use them.</p> <p>In order to promote cycling in the borough the Council will seek to ensure developments: Provides and makes contributes towards connected, high quality, convenient and safe cycle routes; Provides accessible, secure cycle parking facilities exceeding minimum standards and requirements outline in CPG 7 Transport SPG; and Are permeable.</p>	<p>development is expected at accessible locations within the Borough, legal agreements will be used to maintain car-free development over the lifetime of a scheme.</p> <p>Section 9 Cycling Facilities Cycle parking – 1 space per person per 250sqm Para 9.8 Cycle parking should be provided off street – within the boundary of the site and be accessible and secure. Positioned near entrances, clear of clear routes needed for pedestrian movement.</p>

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	<p>provide on-site changing facilities and facilitate the Cycle Super Highways Cycle Parking. Policy 6.9 provides the details parking standards that must be considered within the design and planning process.</p> <p><u>D1 Other (e.g Church) Cycle Parking Standards</u> Long Stay: 1 space per 8 staff. Short Stay: 1 space per 100sqm.</p> <p>Policy 6.10 Walking Developments should ensure high quality pedestrian environments referring to TfL's Pedestrian Design Guidance.</p> <p><u>Accessible London SPG (2004)</u> SPG Implementation Point 27: Parking Design Any proposal for car-free development should demonstrate where Blue</p>		<p>Goods and Materials Development generating significant movement of goods or material by road during construction and/or in operation should be located close to the TfL road network, accommodate goods vehicles on site and seek opportunities to minimise disruption for local communities through effective management.</p>	<p>In order to promote the provision of public transport in the borough the Council will seek to ensure that development:</p> <p>Contributes towards improvements to the bus network, including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information; and</p> <p>Contributes towards travel interchange facilities particularly in locations where changes to different modes of transport are expected.</p> <p>Policy T2 Car-Free Development and Limiting the Availability of Parking The Council will limit the availability of parking and require all new developments in the borough to be car-free.</p> <p>Policy T4 Promoting the Sustainable Movement of Goods and Materials Developments that generate significant movements of goods or materials by road (both during</p>	

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	Badge Holders can park in order to easily use the development.			construction and operation) will be expected to: Minimise the impact of freight movement via road by prioritising use of TfL road network or other major roads; and Provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments.	
Sustainability, Energy and Water	<p>Policy 5.2: Minimising CO2 Emissions For non-domestic buildings, from 2013-2015 proposals should demonstrate a 40% improvement on 2010 building regulations and between 2016-2019 proposals should meet the building regulation requirements.</p> <p>Major applications should provide a detailed energy assessment; required elements within the submission are detailed within Policy 5.2 and should be referred to prior planning submission.</p>	<p>Policy CS5 – Managing the impact of Growth and Development Development will: Provide uses, infrastructure and facilities that support the population of Camden; Provide sustainable buildings and spaces of the highest quality; Protect and enhance the environment and heritage and the amenity and quality of local communities. The amenity of Camden's residents will be protected by: Making sure the impact of</p>	<p>Policy DP22 Promoting Sustainable Design and Construction Development should incorporate sustainable design and construction measures including the incorporation of green/brown roofs and green walls where suitable. New buildings should meet the Code for Level 6 and the 'excellent' standard in BREEAM assessments. Schemes should also include appropriate climate change adaptation measures such as, planting, limiting run of, reduced water consumption and</p>	<p>Policy CC1 Climate Change Mitigation Developments should meet the highest feasible environmental standards that are financially viable during construction and occupation. The Council promote zero carbon development, require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met and expects all developments to optimise resource efficiency.</p> <p>Policy CC2 Adapting to Climate Change The Council will require development to be resilient to climate change.</p>	<p>CPG 3 Sustainability Section 3 Energy Efficiency: New Buildings Para 3.0 All new developments are to be designed to minimise carbon dioxide emissions – the most cost effective ways to minimise energy demand is through good design and high levels of insulation and air tightness.</p> <p>Section 6 Renewable Energy Para 6.0 Developments are to target a 20% reduction in carbon dioxide emissions from on-site</p>

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	<p>Policy 5.3: Sustainable Design and Construction Proposals should meet the minimum standards set out in the Mayor's SPG and incorporate the nine design principles which are detailed in Policy 5.3. Reference is to be made to the principles throughout the design and planning processes.</p> <p>Policy 5.6: Decentralised Energy in Development Proposals Proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems.</p> <p>Policy 5.7: Renewable Energy Within the framework of the energy hierarchy, major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy</p>	<p>development on neighbours is fully considered Ensuring development contributes to the successful communities, balancing the needs and characteristics of local areas and communities;</p> <p>Policy CS13 Tackling Climate Change Through Promoting Higher Environmental Standards Development is required to meet the highest feasible environmental standards that are financially viable throughout construction and occupation.</p>	<p>reduced air pollution.</p> <p>Policy DP23 Water Developments should reduce their water consumption and pressure on the combined sewer network.</p>	<p>All development should adopt appropriate climate change adaptation measures. Any development involving 5 or more residential units or 500sqm or more or any additional floorspace is required to demonstrate measures in a Sustainability Statement.</p> <p>The Council will promote and measure sustainable design and construction by: Ensuring development schemes demonstrate how adaption measures and sustainable development principles have been incorporated into the design and proposed implementation. Expect developments with 500sqm of floorspace to achieve 'excellent' in BREEAM assessments and encouraging zero carbon in new development from 2019.</p>	<p>renewable energy technologies</p> <p>Section 9 Sustainability Assessment Tools Para 9.0 New buildings should meet the Code for Level 6 and the 'excellent' standard in BREEAM assessments.</p> <p>Section 10 Brown Roofs, Green Roofs and Green Walls Para 10.3 The Council will expect all developments to incorporate brown roofs, green roofs and green walls unless it is demonstrated this is not possible or appropriate.</p> <p>Section 12 Adapting to Climate Change Para 12.4 All development is expected to consider the impact of climate change and be designed to cope with the anticipated conditions.</p>

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	<p>generation, where feasible.</p> <p>Policy 5.9: Overheating and Cooling Detailed guidance and requirements regarding ways in which major developments can reduce the potential overheating and reliance on air conditioning can be found within Policy 5.9 and should be referred to in detail throughout the design and planning process.</p> <p>Policy 5.10 Urban Greening Proposals should integrate green infrastructure from the beginning of the design process (e.g. tree planting, green roofs and walls, soft landscaping).</p> <p>Policy 5.11: Green Roofs and Development Site Environments Major development proposals should be designed to include roof, wall and site plating,</p>				<p>Section 13 Biodiversity Para 13.0 Proposals should demonstrate how biodiversity considerations have been incorporated into the development.</p>

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	<p>especially green roofs.</p> <p>Sustainable Design and Construction SPG (2014) Developers are encouraged to include innovative low and zero carbon technologies to minimise carbon dioxide emissions within developments and keep up to date with rapidly improving technologies.</p>				
Noise and Air Quality	<p>Policy 7.14: Improving Air Quality Developments should: minimise increased exposure to existing poor air quality and make provision to address local problems of air quality; promote sustainable design and construction to reduce emissions from demolition and construction; be as least air quality neutral and ensure that where provision is needed to reduce</p>		<p>Policy DP28 Noise and Vibration Planning permission will not be granted if: The proposed development is likely to generate noise pollution or is sensitive too noise and proposed within a noise polluted area. The development exceeds Camden's Noise and Vibration Thresholds. The Council will seek to</p>	<p>Policy A4 Noise and Vibration The Council will seek to ensure that noise and vibration is controlled and managed. Planning permission will not be granted for: Developments likely to generate unacceptable noise and vibration impacts; or Development sensitive to noise in locations with existing high levels of noise unless appropriate attenuation measures are provided. Permission for noise generating</p>	<p>CPG 6 Amenity Chapter 2 – Air Quality Para 2.7 Development should be design to minimise exposure to existing poor air quality. Para 2.8 An air quality assessment³ may be required for a proposal if it introduced uses that are susceptible to poor air quality. Para 2.14 The impact of the construction and</p>

³ Detailing of what should be included within an Air Quality Assessment can be found in CP6 Amenity Page 9 Para 2.11

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	<p>emissions, this is provided on site, unless it is impractical or inappropriate.</p> <p>Policy 7.15: Reducing Noise and Enhancing Soundscapes Development proposals should minimise potential and existing impacts from noise and separate new noise sensitive developments from major noise sources wherever practicable and promote new technologies and improved practices to reduce noise.</p> <p>Sustainable Design and Construction SPG (2014). 4.3 Air Pollution – Air quality assessments may be required for major developments. 4.3.14 The London Plan and Mayor's Air Quality Strategy set out developments are to be at least 'air quality neutral'.</p>		<p>minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, conditions and planning obligations maybe used.</p> <p>Policy DP32 Air Quality An air quality assessment maybe required to be submitted with the planning application, if the proposed is deemed to cause significant harm to air quality.</p>	<p>development will only be granted if when operational no harm to amenity is caused or noise thresholds are exceeded.</p> <p>Policy CC4 Air Quality The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of a development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.</p> <p>Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless mitigation measures are adopted to reduce the impact to acceptable levels. Similarly, developments in locations of poor air quality will not be acceptable unless designed to mitigate the impact to within</p>	<p>demolition phases of the development on air quality must be taken into account as part of any planning application.</p> <p>Para 2.17 Best practice measures are to be adopted during construction and demolition work to reduce and mitigate air pollution emissions.</p> <p>Chapter 4 – Noise and Vibration Para 4.4 Buildings should be design so the shape and orientation reflect noise and protect the most sensitive uses. Para 4.9 If proposal result in noise and vibration that would case unacceptable impact to nearby uses or occupiers, or proposes sensitive uses near a source of noise or vibration and cannot be adequately attenuated then planning permission is likely to be refused.</p>

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	<p>4.4 Noise – Developments should be carefully laid out to reduce noise.</p> <p>The Control of Dust and Emissions During Construction and Demolition SPG (2014) Chapter 3 Air Quality Statement With the application submission, developers will be expected to produce an Air Quality Assessment. This should include an Air Quality (Dust) Risk Assessment (as set out in Chapter 4). The risk category of the site calculated in the Dust Risk Assessment should be used to give an indication of likely required dust emission and control measures.</p> <p>Chapter 4 Air Quality Risk Assessment A dust risk assessment</p>			<p>acceptable limits.</p> <p>Development which involves significant demolition, construction or earthworks will also be required to assess the risk of impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.</p>	<p>Para 4.10 Acoustic/noise and vibration information in the form of a report may be required to support a planning application submission⁴.</p> <p>Chapter 5 Artificial Light Para 5.5 Structures supporting, and the installation of lighting equipment may require planning permission, especially if they are substantial or affect the external appearance of the building.</p> <p>Chapter 6 Daylight and Sunlight Para 6.4 A daylight and sunlight report should assess the impact of the development following the methodology set out in the most recent Building Research Establishments (BRE) 'Site Layout Planning for Daylight and Sunlight: A</p>

⁴ Detailing of information required in regards to noise and vibration can be found in CP6 Amenity Page 22 Para 4.12

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	should be submitted to the Local Planning Authority as part of the Air Quality Statement with the planning application. For the Air Quality Risk assessment detailed requirements please refer to the SPG page 26.				Guide to Good Practice'. Chapter 7 Overlooking, Privacy and Outlook Para 7.4 development should be designed to protect the privacy of both new and existing buildings to a reasonable degree. New buildings, roof terraces and the location of new windows should be carefully designed to avoid overlooking.
Waste		CS18 Dealing with our Waste and Encouraging Recycling Developments should include facilities for the storage and collection of waste and recycling.	DP 26 Managing the Impact of Development on Occupiers and Neighbours The facilities for storage, recycling and disposal of waste should not affect the quality of life for occupiers and neighbours.	Policy CC5 Waste Developments should include facilities for the storage and collection of waste and recycling.	CP1 Design Chapter 10 Recycling and Waste Storage Adequate space for the storage of recyclables and waste should be included within new developments.
Planning Contributions and Obligations	Mayoral CIL Charging Schedule (2012) £35 per sqm charge for the provision of new floorspace. The replacement of existing floorspace is not included.	CS19 Delivering and Monitoring the Core Strategy Planning obligations and other suitable mechanisms, where appropriate will be used to:	DP12 Supporting Strong Centres and Managing the Impact of Food, Drink, Entertainment and Other Town Centre Uses Planning conditions and obligations will secure the hours of operation, noise	Policy A4 Noise and Vibration Conditions and planning obligations may be used where development is likely to cause harm or is in close proximity to noise sensitive uses. Policy TC4 Food, Drink, Entertainment and Other Town	CPG 8 Planning Obligations Standard Obligations to Council will seek are as followed: Affordable Housing and Housing in Mixed Use Development;

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	<p>Policy 8.3: Community Infrastructure Levy (CIL) The Mayor will ensure the effective development and implementation of CIL, Priorities for CIL should be identified within the LDF process.</p>	<p>Support sustainable development; Secure any necessary and related infrastructure, facilities and services to meet needs generated by development; and Mitigate the impact of development.</p>	<p>creation, the expansion of the customer are into ancillary areas, the use of local management agreements to ensure the premises are managed responsibly to minimise impact on surroundings.</p>	<p>Centre Uses To manage potential harm to amenity or the local area, we will, in appropriate cases, use planning conditions and obligations to address the following issues: Hours of operation; Noise/vibration, fumes and the siting of plant and machinery; The storage and disposal of refuse and customer litter Tables and chairs outside of premises; Community safety; The expansion of the customer area into ancillary areas such as basements; The ability to change the use of premises from one food and drink use or one entertainment use to another (within Use Classes A3, A4, A5 and D2); and The use of local management agreements to ensure that the vicinity of premises are managed responsibly to minimise impact on the surrounding area. Contributions to schemes to manage the off-site effects of a development.</p>	<p>Employment and Business Support; Community Facilities; Amenity Space; Design; Sustainability; Employment and Business Support; Provision of flexible shops and business space; Transport; and Provision of Public Open Space.</p>

Appendix 4: **The Lighthouse 'A Place of Worship'**

Why The Lighthouse is a place of worship.

The online Oxford English Dictionary defines 'worship' in three ways as:

"The feeling or expression of reverence and adoration for a deity" and
"Religious rites or ceremonies, constituting a formal expression of reverence for a deity,"
and "Great admiration or devotion shown towards a person or principle."

<https://en.oxforddictionaries.com/definition/worship>

There is a widespread understanding within Christianity that the reverence, adoration and devotion shown to the deity is expressed in the whole of life and not just in formal gatherings with other people. It is put thus:

"True worship is a matter of the heart expressed through a lifestyle of holiness."

<http://www.christianitytoday.com/biblestudies/bible-answers/spirituallife/what-is-true-worship.html>

and

"True worship is a way of life.... Worship is any surrendered response to truth."

<http://ministry127.com/christian-living/true-worship-is-a-way-of-life>

The 'lifestyle of holiness' and 'surrender to truth' is expressed in all aspects of work and church life. All Christian activity is, therefore, an act or expression of worship. It is an expression of reverence, adoration and devotion in response to Christians' understandings of the nature of the deity and their perceived relationship with that deity. Where the design and purpose of the building is for the expression of this devotion, the building is a place of worship.

Christians are likely to be at the forefront of staffing or managing most of the services proposed in the Lighthouse. This includes the Café, the Spear youth unemployment training, the children's and youth work (apart from the accommodation run for young people who have been in care) the marketing and communications and the community and business development activities.

Among the proposed delivery partners, XLP is a faith based charity. The accommodation for people training for the Church of England priesthood will house people whose commitment to training is an expression of their devotion.

Seeking to partner with St. Christopher's Fellowship in accommodating young people who are in care or otherwise unable to live with their families, is also an act of worship. It is an expression of the Christian value that all humans are of supreme worth. The church communicates this value through providing hospitality and sanctuary to vulnerable young people. The church bothers to do this because it believes this is in line with the will of God. This then, is a 'response to truth.'

On this understanding, The Lighthouse is wholly a place of worship.

Tim Keightley
September 2016

Appendix 5: Howarth Tompkins Design Review Panel Response, February 2017

Our Ref: 1326-LET-46:04.01

15/02/2017

David Peres da Costa
London Borough of Camden
Development Management Regeneration and planning
5 Pancras Square
London
N1C 4AG

Dear David,

Holy Trinity Church

London Borough of Camden Review Panel

This letter responds to the Design Review Panel's report following our meeting to discuss the proposed Lighthouse project on the Finchley Rd.

Summary

The church has responded separately about the scope of the brief and how it meets their needs.

We have considered the set back of the frontage to create a bigger external threshold space within the constraints of the site. Our scheme presented at the DRP pushed back the entrance by 1.75m from the back of pavement site boundary. On review we have now pushed the entire frontage of the building back by a further 200mm which now provides a 1.95m recess from the back of pavement boundary and a total pedestrian area depth of 5.53m from the carriageway kerb edge to the entrance threshold. The front façade piers backing onto the Finchley Rd pavement are now set back from the boundary line by 250mm.

Any further set back is constrained by the existing pedestrian pathway that rises steeply from the Finchley Road pavement level up towards the Alban House entrance and is not DDA compliant. To work within these existing site levels, without cutting into the slope of the pathway, a corner entrance that enables the free flow of people onto the pathway as well as providing level access from the Finchley Road is bound by these constraints.

The openness of the existing pedestrian pathway provides a generous external threshold to the new building allowing access to both the front and rear entrances.

The following notes relate to specific points raised:

Scheme layout

The change in site levels and intensity of building uses has encouraged us to develop a dynamic and exciting internal layout, which unites the function of the building as both a 21st century church as well as a community centre.

Crucial to the mission of the Lighthouse are two, inextricably linked ideas: the joyful celebration of faith and an open hearted welcome, both to the congregation and to the community at large. Together they inform the entire design of the Lighthouse building, and are encapsulated in the conceptual interrelationship of the central worship space with the main public 'face' of the building, which addresses the busy thoroughfare of the Finchley Rd. The upper part of the external front elevation is a circular filigree of patinated metal contained in a simple square facade, exactly mirroring the plan geometry and scale of the vaulted worship space and auditorium at the heart of the building and the church organisation.

The two lower street-fronting storeys, behind which is the double height entrance foyer, café and the outer curve of the auditorium, are visually porous to make the building as welcoming and unthreatening for as large a cross section of the community as possible. In addition to illuminated signage and a large cross within this zone, a highly visible café server, informal seating and advertised events and activities make clear the building's identity and invite exploration from passers by.

The church will use AV presentations within the auditorium and require the space to be flexible in use. Therefore the natural light entering into the auditorium will require close control. There is a possibility of introducing more light from behind the altar, however this would be a decision for the Church.

Pushing back the auditorium is constrained by the rights of light to Alban House, and lowering the auditorium limits space for the studio below. Early on we discounted a basement due to the cost implications.

Circulating through the worship space at the heart of the building on a day-to-day basis strengthens the presence of the auditorium and is regarded as a palpable benefit by the client. The expressed form of the curved auditorium is visible from both entrance foyers, with the internal "street" circulation between the ground and first floor entrances passing underneath the circular form to connect the two entrance levels.

Place-making, character and quality

As described above, the recessed corner entrance with the pedestrian pathway alongside provides a generous public space for people to gather, meet at the entrance, and allow for a moment of pause before either entering the building from the Finchley Road or continuing up the pathway to

the rear entrance adjacent to Alban House.

The entrance and circulation zones serve both as arrival spaces, public refreshment areas and informal gathering spaces, interconnected by clear routes and sufficiently demarcated to allow multiple options for inhabitation and flexible use. They are designed to convey in physical form the open welcome of the church towards the entire community. They are emphatically not intended to reinforce perceptions of exclusivity or replicate nineteenth century liturgical traditions.

Relationship to surroundings: access and integration

The Lighthouse will be a beautiful, open hearted and hard working new building at the centre of a diverse and complex London community.

The double height entrance foyer and auditorium's curved exterior surface expresses the worship space at the heart of the building. On entering the building, the main stair located directly off the entrance foyer connects to the first floor auditorium foyer and entrance.

The vibrant street fronting café provides an informal welcome and will have a strong connection to the activity of city life along Finchley Road. Being able to operate independently from the church activities, the cafe will be a facility for the whole community. "This living room of the Finchley Road" will encourage passers by to come into the church and learn about the building. The large windows are divided into smaller panes providing a domestic scale of glazing creating a greater sense of enclosure and shading within the cafe yet still ensuring good levels of natural light and transparency.

Architecture

The balance of the front and side facades is a crucial aspect of the architectural resolution. On one level the street façade is a pure sign, representing the worship space within, whilst on another level the formal three dimensional character of the upper part of the building needs to be properly expressed. An earlier design option explored a thicker edge to the upper level northwest corner, but as the scheme progressed a more slender edge was preferred. This establishes a more seamless connection between front and rear facades, uniting the Finchley Road decorative screen frontage with the curved rear slatted screen that sweeps away from the corner and envelopes the upper level stepped terraces.

In response to the DRP comments we have retained our original façade design that extends the radiating fins of the central circle out to the edge of the square screen.

Joanna Sutherland

Joanna Sutherland
For and on behalf of Haworth Tompkins Limited

Encs.

Appendix 6: Holy Trinity Church Design Review Panel Response, February 2017

2 February 2017

To Whom It May Concern:

London Borough of Camden Design Review Panel
Holy Trinity Church's response to Report of Chair's Review Meeting

This letter responds to the report of the Design Review Panel following the church's meeting with the panel to discuss the proposed 'Lighthouse' project.

Summary

We welcome and affirm the Panel's conclusion that the scheme is in good hands and that the design is a good attempt to reconcile the demands of the brief with a constrained site.

The brief was devised wholly in response to community need and the desire to develop the potential of the site to meet that need.

Our architects are looking at a small set back of the lower ground and first floors and will be illustrating the entrance and threshold sequence from Finchley Road.

The auditorium is designed to have the capacity to respond to need and to provide a resource for future generations. Holy Trinity is one of many similar charismatic, informal and modern, churches experiencing year-on-year growth in the numbers of people attending. Currently some 300 people attend at least twice a month.

It is common within this tradition when a new enlarged church building is established that further church growth follows. It is reasonable, therefore, to anticipate that this growth will continue and to plan accordingly.

In addition, the plan is to use the auditorium as a venue for Christian conferences and for the arts and as a performance venue for community groups, schools and partner charities as well as for degree award ceremonies.

Scheme layout

We consider that like all key urban property, our space should "work hard". The church exists for the whole community, not just for its members. The plans allow the site to meet its potential to serve that community and to encourage community life. This is the church's passion.

The façade is the formal expression of the building's function. The building is a church for the 21st Century (not the 19th Century). It is a new expression, not a traditional expression. It stands for a welcome and a place of belonging for believer and non-believer alike; a place for relationship rather than conformity to a set of rules, belief systems or boundaries as a mark of belonging.

In addition, the plans clearly show there will be a cross situated over both entrances indicating the Christian nature of the building.

We are a modern church, and the use of AV presentations and using the worship area for a variety of performance styles means natural light is not always helpful. We also wish to avoid the sad situation of many church buildings which offer very limited opportunity to be used by the wider community because the worship space (nave) takes up virtually all the footprint, with enormous windows and high vaulted ceilings constraining the site to one floor.

As currently designed, the new building will provide a beautiful worship space.

The flexible spaces are not an 'optional extra' but integral to the purpose of the building.

Each space has a purpose; for example, to provide fit-for-purpose facilities for existing work, such as the Spear young people's employment readiness programme.

We envisage a wide range of community use by small specialist interest informal educational and health and fitness groups and committees. Holy Trinity School will use the lower ground floor as a gym.

Partner charity XLP will use the space for small group and mentoring work with vulnerable young people.

The church also needs the spaces for its own ministries of healing prayer, Christian education, counselling and family support.

One whole floor is to be allocated for the Lighthouse Home. This will be run by St Christopher's Fellowship and will accommodate seven young women coming from "looked after" backgrounds.

Each of the various spaces, therefore, will help us to provide support for some of society's most vulnerable people, and we cannot see that it would be right to scale down the building and lose the space to do this.

Place-making, character and quality

The plans clearly show a cross situated over both entrances and an electric events noticeboard on display to one side of the main entrance.

The Café space should be seen more than 'merely' an introductory space before a person enters the auditorium. The Café will be a destination. The intention is that a person using only the Café will feel just as welcomed and belonging to The Lighthouse as any other user who may use more of the building's resources. The Café is part of the building's distinctive purpose.

Within the auditorium there will be Christian symbolism such as a font and a cross, much as there is in the present building.

Relationship to surroundings: access and integration

The new building will have a long generous window to the reception and cafe inside. It will be inviting people to come in for hospitality and welcome. The reception and cafe will serve as a "third space" for people to sit and relax, with a clear view of the worship auditorium above. We believe this is exactly the kind of in between space that will enable a person to decide whether to go into the worship area.

Architecture

We are committed to the Lighthouse being built to the highest of design and build standards and that what is built conforms very closely to the agreed design and to our brief.

Inclusive and sustainable design

It is our understanding that the 'commended' commitment to passive ventilation means that the building cannot be set back without fundamentally compromising the current design, and that this was recognised by the Design Review Panel during the Review meeting.

Next steps

We found the open discussion at Design Review Panel helpful with some useful points raised, particularly regarding detailed design.

However, as outlined above the brief set is considered to fully meet the project requirements in terms of amount of space, proposed end users and anticipated growth in user numbers.

For these reasons, we will not be revisiting the brief. Whilst our team will be addressing the design comments raised (façade design and western entrance door) we do not foresee another DRP being useful at this stage.

Yours faithfully,



Tim Keightley
Executive Director

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