

PLANNING STATEMENT

MOUNTVIEW LODGE, 9 SWISS TERRACE, BELSIZE ROAD,
LONDON, NW6 4RR

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Document 1 – Site Location Plan

Document 2 – Area Schedule

1 Introduction

- 1.1 This Planning Statement accompanies a detailed planning application submitted on behalf of Graham Shapiro in respect of a roof extension proposed at Mountview Lodge, 9 Swiss Terrace, Belsize Road, London, NW6 4RR (“the Application Site”). The application seeks planning consent for the following:

Erection of roof extension to provide new sixth, seventh and eighth floors to provide 8 new residential units, associated landscaping and external cycle parking at ground floor.

- 1.2 This planning statement reviews the planning application proposals in light of the development plan, national policy, relevant guidance and material considerations and sets out the clear and demonstrable benefits of delivering additional residential accommodation in this location.
- 1.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. For reasons more fully set out in this planning statement, the development accords with the development plan and its compliance with other significant material considerations, principally the National Planning Policy Framework (2018) ("NPPF"), and further reinforces the case for a grant of planning permission.
- 1.4 The application is submitted with the following accompanying documentation:

Document	Author
Planning Application Cover Letter	Quod
Planning Application Forms	Quod
Planning Statement	Quod
CIL Submission	Quod
Affordable Housing Statement (Included within Planning Statement)	Quod
Red Line Application Boundary	Woods Hardwick
Application Drawings	Woods Hardwick
Accommodation Schedule	Woods Hardwick
Design and Access Statement	Woods Hardwick
Daylight and Sunlight Assessment	BVP
Energy Statement	Furness Green
Sustainability Statement	Etude
Noise Impact Assessment	Clarke Saunders
Air Quality Assessment	WYG
Surface Water Drainage Proforma	RPS
Tree Survey	Tyler Grange

- 1.5 This suite of documents demonstrate that the application proposals accord with development plan policy and that there are significant material considerations which weigh in favour of development.

1.6 This Planning Statement is structured as follows:

- **Section 2 - Development Context:** This section discusses the planning history for the Application Site, the local surrounding area and pre-application consultation.
- **Section 3 - Details of the Proposed Development:** This section introduces the application proposals.
- **Section 4 - Development Plan Policy:** This section provides a commentary on the development plan and NPPF, together with other material considerations.
- **Section 5 - Planning Assessment:** This section evaluates the proposed development against the relevant policies of the development plan and national planning policy/guidance and material considerations.
- **Section 6 - Planning Obligations:** This section reviews the planning obligations that will be provided in connection with the development and considers the Community Infrastructure Levy liability arising out of the development.
- **Section 7 - Conclusions:** This section provides a summary of the justification for granting planning permission for the development proposals.

1.7 This application submission follows a period of pre-application engagement with Camden Council. The full extent of this consultation is discussed in detail within the following section.

2 Development Context

- 2.1 This section reviews the current characteristics of the Applications Site, and provides an overview of the surrounding area to provide a physical context to the application proposals. A site plan illustrating the Application Site boundary is provided at **Document 1**. Photographs of the Application Site appear within the accompanying Design and Access Statement.
- 2.2 This section also identifies the historic context of the proposals and their evolution through discussion with Camden Council.

Application Site

- 2.3 The Application Site is located on Belsize Road, to the north (70m) of Swiss Cottage Underground Station and south (500m) of Finchley Road Underground Station within the London Borough of Camden.
- 2.4 The existing building is 6 storeys, and reads alongside the neighbouring building of the same height. The building was granted prior-approval for change of use from B1 office to C3 residential in stages during 2013-2015 and change of use has been implemented. The building has also undergone external improvements in the form of rendering and window replacement (since 2014). The building represents part of a transition between residential and commercial locations.
- 2.5 The building is not listed, nor are there any located within the immediate vicinity, with the closest situated beyond Swiss Cottage Underground Station (175m – south east). The site is not located within a Conservation Area.
- 2.6 The site is highly accessible with a Public Transport Accessibility Level (PTAL) of 6b (Best).

Surrounding Context

- 2.7 The surrounding area contains a range of built forms and scales with an 11 storey building to the north east of the site, and an 8 storey building immediately south. To the west the properties along Belsize Road are residential, whilst the eastern boundary of the site is formed by the commercial and retail properties of Finchley Road.
- 2.8 The application site is highly accessible to public transport, pedestrians and cyclists and offers significant opportunities to travel by sustainable transport modes. The Application Site is located in close proximity to several bus stops located on Finchley Road and approximately 70m from Swiss Cottage Underground Station, and 450m from Finchley Road Underground Station.
- 2.9 There are a number of parks and open spaces within walking distance of the site including:
- Regents Park (approximately 750m south east of the site);
 - Hampstead Heath (approximately 1.4km north east of the site); and
 - Paddington Recreation Ground (approximately 1.5km south west of the site).
- 2.10 The area is therefore well-placed to support further much-needed homes.

Planning History

2.11 Relevant planning history for the site relates to several prior approval applications, detail of which is re-provided below:

Ref. No	Description of Development	Decision/Date
2013/6128/P	Change of use from office (Class B1a) to 14 self-contained residential units (Class C3) comprising 2 x studios, 6 x 1-bedroom and 6 x 2 bedroom flats at first to fifth floor level	Approved 20/11/13
2014/0589/P	Change of use from office (Class B1a) to 6 self-contained residential units (Class C3) comprising 2 x studios and 4 x 1 bed flats at lower ground & ground floor levels.	Approved 08/04/14
2014/5817/P	Change of use from offices (Class B1) at 1st to 5th floor levels to residential use (Class C3) to provide 20 units (15 x 1 bed, 5 studios).	Approved 12/11/14
2015/5562/P	Change of use at ground floor level from offices (Class B1a) to residential use (Class C3) to provide 1 x 2 bed unit, 1 x 1 bed unit, 1 studio unit.	Approved 23/11/15

2.12 The existing building on site is now entirely in residential use with the exception of the lower ground floor which is in office use.

Pre-application Consultation

2.13 The applicant met with Camden Council for a pre-application meeting on 4th July. This meeting reviewed a range of development control matters including the principle of development, amenity and design/conservation in the context of the emerging/draft proposals.

2.14 Following the pre-application meeting the Council's formal written minutes were received on 13th July 2018. This established the following key points:

- Subject to a refined design, there is no objection to extending the height of the building.
- The impact of a height increase on daylight and sunlight to surroundings would need to be assessed as part of a full application.
- In design terms the proposed 7th & 8th floors are overly complex and should do more to reflect the existing clean and simple form of the host building and setting of the adjacent Centre Heights.
- The proposed roof garden compromises the height and bulk of the building. Camden will take a balanced view with regards to amenity space provision, taking into account a space's usability, attractiveness and the visual impact on the building and surroundings as a whole.
- The unit mix of the scheme needs to be broader.

- 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. This includes new and existing buildings. The rooftop at no. 9 Swiss Terrace is considered to be an appropriate site for a green or brown roof.
- The Council does not object in principal to a roof extension at this site.

2.15 The scope of the planning application was also agreed.

Pre-application Response

2.16 In response to the comments received at pre-application stage the proposal was revised as set out below:

Design

2.17 The architectural approach to the proposed roof extension has been revised so that the 6th and 7th storeys now represent an extrusion of the host building's clean and simple architecture, with the 8th storey proposed in an alternative simplified style removing the curved roof profile.

Roof Garden

2.18 In order to reduce the height and bulk of the building / clutter across the roofline, the previously proposed roof garden has been removed in favour of a green roof which seeks to enhance biodiversity at the site.

Unit Mix

2.19 The unit mix has been increased from a mix of 1 bed 1 person and 1 bed 2 person units to include the following:

Unit Size	Proposed Number of Units	% of Accommodation
Studio	2	25%
1 Bed 2 Person	3	37.5%
2 Bed 3 Person	2	25%
2 Bed 4 Person	1	12.5%

Daylight and Sunlight

2.20 A full daylight and sunlight assessment has been included as part of this application submission. The results of this are detailed in Section 5 of this Planning Statement.

Summary

2.21 To summarise, the proposed development seeks to deliver 8 additional units via a sensitive, high quality 3-storey roof extension. As highlighted the surrounding area contains a range of built forms and scales, with an 11 storey building to the north east of the site and an 8 storey building immediately to the south. This variation in scale in the immediate context is set to further increase following the completion of a 2-storey roof extension to Centre Heights, which is understood to be under construction (2015/2997/P – granted March 2016).

- 2.22 The site is situated in a highly sustainable location (PTAL 6b), benefitting from close proximity to two underground stations (Swiss Cottage & Finchley Road).
- 2.23 The pre-application discussion has informed the final scheme details as submitted. Positive responses are presented within the application relative to themes identified. This represents a positive pre-application process to front-load planning issues ahead of submission and enable a swift determination, cognisant of relevant material considerations; this is supported at all levels.

3 Proposed Development

3.1 This section describes the proposed development and defines the principal components of the scheme. The application is accompanied by a full set of visual and illustrative material, prepared by Woods Hardwick which illustrates the development proposals and explains the rationale behind the design.

Key Development Proposals

- Erection of new 6th, 7th and 8th storey to provide residential accommodation in the form of 8 new residential apartments – comprising the following unit mix:

Unit Size	Proposed Number of Units	% of Accommodation
Studio	2	25%
1 Bed 2 Person	3	37.5%
2 Bed 3 Person	2	25%
2 Bed 4 Person	1	12.5%

- All units to be compliant with Part M of the Building Regulations with level entrance thresholds.
- New 6th and 7th floors that take precedence from the apartments at lower levels already located at Mountview Lodge.
- New Zinc-clad 8th floor designed to take reference from the existing roof-top plant room and other buildings found in the vicinity. The 8th floor is set back slightly from the existing building line which allows for the provision of two balconies, which provide policy compliant private amenity space for two units.
- New rationalised plant room located at sixth floor.
- Provision of 14 external cycle spaces at ground floor, located adjacent to the building entrance.
- Extended stairwell, lift and service riser throughout the new floors to maintain ease of circulation. The lift will terminate at the 8th floor, whilst the stairwell will continue to rise to the roof for maintenance access.
- Provision of new green roof at roof level (approximately 115m²) designed to encourage biodiversity and improve outlook at the building.
- External windows and detail designed to match or remain proportionate to current facade design at Mountview Lodge. The windows on the sixth and seventh floor have been designed to match those on the floors beneath replicating the existing design of the host building.
- Inclusion of a sensitive palette of materials designed to mirror the existing building design whilst also providing a break in the building's articulation at 8th floor level;
- Enlarged external bin store to provide an addition 1320 litres of capacity for new residents.

4 Development Plan Policy

- 4.1 This section provides a commentary on the nature of the development in the context of development plan policy, policy guidance and other material considerations. An assessment of local development plan policy and specific local policy issues are dealt with in Section 5 within this statement.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals shall be determined in accordance with the development plan unless material considerations indicate otherwise. The site is situated in Camden, and as such the development plan consists of the London Plan (2016), The Camden Local Plan (2017), Proposals Map (2018) and Site Allocations document (2013).
- 4.3 The development plan should be read in the context of National Policy Guidance which is a material consideration and the emerging London Plan.

Development Plan

London Plan (2016)

- 4.4 The latest version of the London Plan was adopted in 2016 and sets out the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years.
- 4.5 The document brings together the geographic and locational aspects of the Mayor’s other strategies – including those dealing with:
- Transport;
 - Economic Development;
 - Housing;
 - Culture;
 - A range of social issues such as children and young people, health inequalities and food; and
 - A range of environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste.
- 4.6 The document also provides the framework for the development and use of land in London and the strategic, London-wide policy context within which boroughs should set their detailed local planning policies.

Camden Local Plan (2017)

- 4.7 The Local Plan was adopted by Camden on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.
- 4.8 The document identifies the Local Plan as the key delivery mechanism for the Camden Plan and other Council strategies including the Joint Health and Wellbeing Strategy.
- 4.9 The document identifies 13 strategic objectives for Camden which include the following:

- *To create the conditions for growth, ensuring it takes place in the most appropriate and sustainable locations and minimises the impacts of development, and to harness the benefits of this growth so it meets the needs of Camden's communities for homes, jobs and services and preserves and enhances the borough's unique character and appearance.*
- *To secure safe, socially mixed and balanced areas with strong, cohesive and resilient communities to help reduce inequality in the borough, while supporting the provision of the accessible facilities and services needed to meet community needs.*
- *To provide homes that meet the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of dwelling sizes. Self-contained housing is the priority use of the Local Plan.*
- *To support the existing and future successful development of our town and neighbourhood centres and the retail areas in Central London, while adapting to changes in their role and how people shop.*
- *To promote high quality, safe and sustainably designed buildings, places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our conservation areas and our other historic and valued buildings, spaces and places.*
- *To promote sustainable transport for all and to make Camden a better place to cycle and walk around, to reduce air pollution, reliance on private cars and congestion and to support and promote new and improved transport links.*
- *To make sure that development in Camden minimises its energy use by encouraging local efficient energy generation, achieving the highest possible environmental standards, and is designed to adapt to, and reduce the effects of, climate change.*
- *To promote and protect the high levels of amenity and quality of life that makes Camden such an attractive, successful and vibrant place for residents, workers and visitors.*

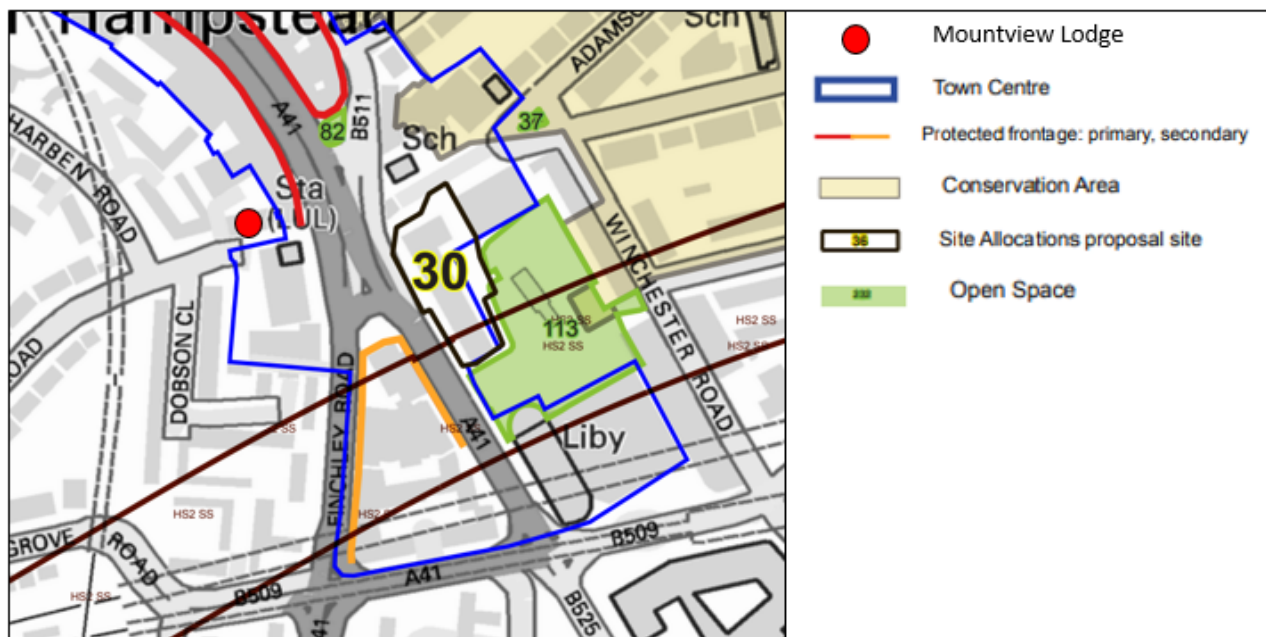
Site Allocations Document (2013)

- 4.10 The Site Allocations document sets out the Council's key objectives and guidance for development of land and buildings on significant sites which are likely to be subject to development proposals during the lifetime of the Core Strategy (2010-2025).

Development Plan Designations

- 4.11 The relevant extract from the Camden Proposals Map (2018) is provided below:

Figure 4.1 - Camden Proposals Map Extract



4.12 This confirms the site has no designation on the adopted proposals map, nor are there any site allocations guiding development on the site. The above extract also confirms the site is outside of the following designations:

- Town Centre;
- Protected Frontage;
- Conservation Area;
- Site Allocations; and
- Open Space.

4.13 The policies relevant to the current proposals are considered individually within the analysis part (Section 5) of this report.

Material Considerations

National Planning Policy Framework (2018)

4.14 The revised National Planning Policy Framework was published in July 2018 and is the first revision of the document since 2012.

4.15 Paragraph 2 of the NPPF states:

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

- 4.16 The NPPF introduces the presumption in favour of sustainable development. Paragraph 7 of the NPPF states:

The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

- 4.17 As clearly stated at paragraph 14:

Plans and decisions should apply a presumption in favour of sustainable development.

*For **decision-taking** this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 4.18 Section 5 of the revised NPPF relates to delivering a sufficient supply of homes. Paragraph 5 states:

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

- 4.19 Additionally with regards to small sites paragraph 68 states:

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;

c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

4.20 Section 11 of the NPPF relates to making effective use of land. Paragraph 118 sets out a number of objectives for planning policies and decisions including:

Support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

4.21 The central theme of the NPPF is the presumption in favour of sustainable development, and encourages local authorities to approve applications swiftly that are in accordance with the development plan.

Supplementary Planning Document and Guidance

4.22 Camden has also adopted several planning guidance documents. Those relevant to this application comprise:

- Interim Housing CPG (March 2018);
- Housing CPG (as amended March 2018);
- Amenity CPG (2018);
- Design CPG (July 2015 updated March 2018);
- Sustainability CPG (July 2015 updated March 2018); and
- Planning Obligations CPG (July 2015 updated March 2018).

Conclusions

4.23 Development plan policy and guidance is supportive of sustainable development. The delivery of housing in sustainable locations is encouraged at all policy levels.

4.24 The application site is not subject to a site specific allocation and thus is subject to the wider provisions of the development plan and material considerations relevant to the proposals. The proposals present an opportunity to provide much needed housing in the area.

4.25 The following section sets out the topic-based references to the relevant policies from the documents identified within this section.

5 Planning Assessment

5.1 This section provides an assessment of the application proposals in light of the development plan and material considerations relevant to the scheme. It considers the main issues and planning considerations raised by the planning application proposals as follows:

- Principle of Development – New Homes
- Affordable Housing
- Residential Design
- Design
- Daylight/Sunlight
- Energy/Sustainability
- Air Quality
- Parking and Transport

5.2 Each consideration is addressed in turn within this section.

Principle of Development – New Homes

5.3 The NPPF makes clear the following:

- LPA's should boost significantly the supply of housing;
- LPA's should, as a minimum, seek to meet the area's objectively assessed needs; and
- LPA's should only expand into the green belt after considering brownfield development.

5.4 As highlighted previously Section 11 of the NPPF relates to making effective use of land. Paragraph 118 sets out a number of objectives for planning policies and decisions including:

Support(ing) opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

5.5 London Plan (2015) Policy 3.3 seeks to increase housing supply stating The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. The policy also identifies annual average housing supply for the period 2015-2025. The minimum ten year target for Camden is set as 8,892 houses equating to an annual monitoring target of 889 units per annum.

5.6 Further to the above the draft London Plan (2017) identifies 10 year housing targets for net housing completions (2019/20-2028/29) for each borough. In Camden this is set at 10,860, equating to an annualised average of 1,086. This has therefore increased significantly from the existing London Plan position.

- 5.7 Local Plan Policy H1 (Maximising Housing Supply) states the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.
- 5.8 The policy states Camden will seek to exceed the target for additional homes, particularly self-contained homes by:

Regarding self-contained housing as the priority land-use of the Local Plan; (Quod Emphasis)

Working to return vacant homes to use and ensure that new homes are occupied;

Resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing; and

Where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

- 5.9 The provision of 8 new homes is a significant material consideration in the determination of this application. The benefits of this proposal are significant, in contributing to meeting the identified need for housing within Camden which fully accords with development plan policy.
- 5.10 There is therefore explicit policy support for the delivery of residential accommodation at all policy levels and the provision of 8 additional homes at this highly sustainable location ought to be supported.
- 5.11 Further to the above the application site has a PTAL of 6b (best). There is explicit policy support for maximising residential densities and reduced reliance upon private cars in these locations.

Affordable Housing

- 5.12 Local Plan Policy H4 (Maximising the Supply of Affordable Housing) states the Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- 5.13 Policy H4 states Camden will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. With regards to developments proposing a capacity of fewer than 10 dwellings the policy states the Council will accept a payment-in-lieu of affordable housing.
- 5.14 Targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home. Targets are applied to additional housing floorspace proposed. A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity.
- 5.15 A full accommodation schedule is provided at **Document 2**.

5.16 The GIA uplift for the proposed development is 617 sqm providing indicative capacity for 6 homes and a target contribution percentage of 12%. In order to calculate affordable housing contributions the Council uses GEA measurements, and in the absence of GEA measurements being provided the Council will apply a ratio of 1.25 to GIA figures to calculate the GEA. In this instance the GEA figure (684.4) is included within the area schedule (**Document 2**).

5.17 The payment in lieu is £2,650 per sqm which is the payment level for affordable housing. Using the methodology provided in the Council's guidance on Housing and Planning Obligations (above) this would indicate a contribution of **£217,565.00** for the development.

5.18 The full affordable housing payment-in-lieu calculation is set out in Section 6 of this report. The proposal provides a policy compliant affordable housing contribution to be paid under S106 of the Town and Country Planning Act 1990 (as amended) and is therefore in accordance with the development plan.

Residential Design

Unit Mix

5.19 Local Plan Policy H6 relates to Housing Choice and Mix and states the council will seek to secure a variety of housing suitable for existing and future households overall across development in the borough.

5.20 Local Plan Policy H7 relates to large and small homes and states the council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

5.21 The policy states Camden will seek to ensure that all housing:

- contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and
- includes a mix of large and small homes.

5.22 Additionally Policy H7 highlights the council will take a flexible approach to addressing the mix of dwelling sizes proposed in each development, having regard to criteria including the character of the development, the site area and site size, and any constraints on developing the site for a mix of homes of different sizes.

5.23 The proposed residential development will incorporate the following mix:

Unit Size	Proposed Number of Units	% of Accommodation
Studio	2	25%
1 Bed 2 Person	3	37.5%
2 Bed 3 Person	2	25%
2 Bed 4 Person	1	12.5%

5.24 The proposal provides a range of apartment types ranging in size from studios to 2 bedroom 4 person units which is appropriate given the location of the site and is therefore in line with Policies H6 / H7.

- 5.25 It is also worth highlighting that since pre-application stage the unit mix has been revised as a direct response to comments and significantly increases the variation in unit sizes above the pre-application position.
- 5.26 In addition to the above all units are compliant with overall space standards outlined in Policy 3.5 of the London Plan and compliant with Part M of the Building Regulations (step free access to the front door).

Amenity Space

- 5.27 Local Plan Policy D1 relates to design and identifies criteria the council will seek in order to secure high quality design in development. This includes incorporating outdoor amenity space.
- 5.28 Supporting justification states private outdoor amenity space (including balconies and roof terraces) can add significantly to resident's quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space.
- 5.29 The 6th and 7th floors seek to extrude the host building, matching its existing style and therefore there is no opportunity to provide balconies at these levels. However, the set-back at 8th floor level allows for the provision of external balconies for the two no. two-bedroom apartments on the proposed top floor.
- 5.30 The proposed balconies benefit from direct access and are designed to be compliant with emerging London Plan Policy D4, providing a minimum of 5sqm external space with a minimum depth and width of 1.5m.
- 5.31 It is worth highlighting that a roof top terrace was originally proposed for units not benefiting from a private balcony. This was removed as a direct response to pre-application feedback with Camden who advised:

Whilst the Council is keen to encourage the provision of high quality private amenity space, we will also take a balanced view taking into account a space's usability, attractiveness and the visual impact on the building and surroundings as a whole. As such the provision of the rooftop space in this instance is not considered to be adequately usable, and does not provide significant enough benefit to outweigh its visual intrusion through compromising the height and bulk of the building, in particular the need for a lift core and other clutter across the roofline.

- 5.32 In line with Local Plan Policy D1, it is therefore considered that all options for private amenity space have been explored and provision maximised as part of the proposal.

Design

- 5.33 As outlined above the Local Plan Policy D1 (Design) is the overarching design policy for Camden. It states the Council will seek to secure high quality design in development and sets out detailed criteria proposed development will be assessed against in order to ensure this. Policy D1 states the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 5.34 The high quality design of the proposal and response to pre-application feedback is presented in full within the accompanying Design and Access Statement, however the key design points are discussed below:

Building Height & Scale

- 5.35 The proposed extension involves a new 6th, 7th and 8th Storey. The buildings that immediately surround the site (Centre Heights and Overground House), currently stand at eleven and eight storeys respectively. The site is capable of supporting additional height, and with the additional three floors Mountview Lodge would be brought into alignment with neighbouring buildings. As highlighted previously it was acknowledged at pre-application stage that the current host building was suitable for a roof extension.
- 5.36 Additionally Centre Heights was identified as a prominent 20th century heritage landmark building. In response to this the proposed extension has been designed to be sensitive to this setting with very limited visibility from Finchley Road.

Appearance

- 5.37 The design has been influenced by analysis undertaken in the local area and revised in direct response to pre-application feedback which advised the proposed extension be simplified to mirror the clean and simple form of the host building.
- 5.38 The existing building combines render and zinc cladding (with the existing windows and curtain walling in a bronze anodised finish). The proposed extrusion of the new sixth and seventh floors has replicated the facade design using a simple combination of render and bronze windows in order to mirror the design of the host building. Matching the existing façade design elongates the building visually and ensures the additional massing is proportionate and more elegant than the current arrangement.
- 5.39 With regards to the 8th storey, this has been stepped back to provide a break in the building's articulation (this also allows for the provision of private external balconies for the two units on this floor). The 8th floor set-back offers a clean and simple building profile that prevents the new building outline from looking disproportionate. In keeping with the existing zinc clad roof top plant room, the proposal uses the same material to clad the new top floor.

Landscaping

- 5.40 At roof level the proposal includes a new green roof which is designed to improve biodiversity on site and the outlook from Centre Heights (which currently looks out onto roof plant associated with the lower ground floor office of Mountview Lodge).
- 5.41 The external balconies at 8th floor level also provide additional opportunity for further greening of the proposed extension.
- 5.42 It's worth highlighting that the pre-application proposal sought to include a roof garden which has been removed in direct response to pre-application feedback. This was on the basis that the green roof provides biodiversity benefits without compromising the height and bulk of the building.

Daylight/Sunlight

- 5.43 Local Plan Policy A1 relates to managing the impact of development and states the Council will seek to protect the quality of life of occupiers and neighbours and that permission will be granted for development unless this causes unacceptable harm to amenity. The policy highlights factors that will be considered including sunlight, daylight and overshadowing.
- 5.44 The application submission is supported by a full Daylight and Sunlight Statement. The report considers the potential effect of the development, in terms of the daylight, sunlight and overshadowing effects of the

proposed development on the surroundings. The report also assesses the internal daylight provision to the proposed accommodation within the scheme.

Daylight

- 5.45 With regards to daylight, the report concludes that the daylight availability to the neighbouring buildings would be retained in accordance with the BRE recommendations. Additionally, within the proposed accommodation, the layout ensures that the habitable rooms would receive the benefit of good daylight and this has been confirmed by the results.

Sunlight

- 5.46 With regards to sunlight, the report concludes sunlight availability to neighbouring residential properties that face within 90° of south demonstrates that BRE's recommended values would be satisfied.
- 5.47 Additionally, the proposed accommodation has a layout which has been well considered in relation to site constraints and would satisfy the London Plan.

Overshadowing

- 5.48 With regards to overshadowing, the report highlights the closest neighbouring amenity area would not be subject to any difference in permanent overshadowing. This would satisfy the BRE criteria.
- 5.49 It is therefore concluded that, having due consideration for the nature of urban development the scheme causes the minimum impact on existing surrounding properties whilst achieving acceptable results within the proposed development.

Energy

- 5.50 Local Plan Policy CC1 (Climate Change Mitigation) sets out the council's aims to tackle the causes of climate change in the borough by ensuring developments use less energy and assess the feasibility of decentralised energy and renewable energy technologies. It requires:
- All new residential development will be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy).
 - The Council will expect developments of five or more dwellings and/or more than 500 sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible. This is in line with stage three of the energy hierarchy 'Be green'. The 20% reduction should be calculated from the regulated CO2 emissions of the development after all proposed energy efficiency measures and any CO2 reduction from non-renewable decentralised energy (e.g. CHP) have been incorporated.
- 5.51 The application submission is supported by a full energy statement which identifies the following key 'energy' requirements are considered as applicable for the development:
- Minimum compliance with Approved Document L1B: Conservation of fuel and power in existing dwellings (2010 Edition with amendments to 2018).

- Demonstrate how the design of the development minimises overheating and reduces reliance on air conditioning systems.
- Maximise energy efficiency and the use of low carbon energy.
- Use of LTZ technologies on site, for example solar photovoltaics or thermal systems, wind turbines.

5.52 It is proposed that the thermal performance of the building envelope will be better than the Building Regulations, minimum requirements, as these passive elements will be there for the life of the building.

5.53 The Energy Statement concludes that overall the scheme is achieving an energy reduction of over 41% when compared to the current Part L requirements. Additionally emissions are estimated to be reduced by over 3 Tonnes of CO2 per year. It is therefore considered that the proposal is in full compliance with Policy CC1.

Sustainability

5.54 Local Plan Policy CC2 relates to adapting to climate change and states the Council will require development to be resilient to climate change. The policy identifies any development involving 5 or more residential units or 500 sqm or more of any additional floorspace is required to provide a sustainability statement. Policy CC2 also outlines a number of sustainable design and construction measures to be considered as part of development proposals.

5.55 The application submission is supported by a full sustainability statement. The London Borough of Camden aims to reduce the environmental impact of buildings through planning policy and guidance. The requirements set by the Council have been used to inform the proposed scheme.

5.56 The key points emerging from the Sustainability Statement are provided below:

1. Water. *Water efficiency measures will be implemented through fittings and fixtures. This will limit water use to less than 105 litres/person/day.*

2. Flooding. *The site is at low risk of flooding.*

3. Cyclist facilities. *The development will provide 14 additional bicycle spaces at the front of the building.*

4. Waste. *The development will provide two additional 660L capacity wheelie bins, for general waste and recycling.*

5. Trees. *The three existing trees at the front of the building will be retained and protected throughout construction.*

6. Biodiversity. *A biodiverse roof will be installed to encourage biodiversity.*

7. Materials. *A Green Guide rating of "A" or "A+" will be targeted for windows and key construction elements. Procurement will seek to favour responsibly sourced materials.*

8. Resources. *The development will register under Considerate Constructors Scheme and produce a construction waste management plan.*

9. Overheating. *The development will undertake a full overheating assessment using CIBSE TM59 methodology after planning.*

- 5.57 It is therefore considered that the proposal is in full compliance with sustainability policy as set out in the development plan.

Air Quality

- 5.58 Local Plan Policy CC4 relates to air quality and states the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.
- 5.59 The policy highlights 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 the development on air quality.
- 5.60 Additionally, development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.
- 5.61 The application is supported by a full air quality assessment which concludes:

Prior to the implementation of appropriate mitigation measures, the potential impact significance of dust emissions associated with the construction phase of the proposed development has potential as 'high' at some worst affected receptors without mitigation. However, appropriate site specific mitigation measures have been recommended based on Section 8.2 of the IAQM Guidance on the Assessment of Dust from Demolition, Earthworks, Construction and Trackout. It is anticipated that with these appropriate mitigation measures in place, the risk of adverse effects due to emissions from the construction phase will not be significant.

Following a review of the baseline conditions and the DMRB modelling results, it is predicted that concentrations of NO₂ will exceed the AQO at all modelled proposed residential receptors. Therefore additional mitigation is required. All proposed residential units will be provided with filtration via an "AAC Eurovent Nitrosorb (or similar) unit" (AAC Unit) which is combined with the MVHR mechanical ventilation.

There is not predicted to be an exceedance of the AQO for PM₁₀ at any proposed or existing modelled receptors.

The magnitude of the effects of changes in traffic flow as a result of the proposed development, with respect to NO₂ and PM₁₀ exposure, is determined to be 'negligible'.

- 5.62 It is therefore considered that the proposal is in full compliance with Policy CC4 as set out above.
- 5.63 It is also worth noting that in the delivery of the other relevant works for the building (conversion & external upgrade) no adverse impacts will occur as a result of effective management and mitigation.

Parking and Transport

- 5.64 Local Plan Policy T2 relates to parking and car-free development and states the Council will limit the availability of parking and require all new developments in the borough to be car-free.
- 5.65 Local Plan Policy T1 (Prioritising walking, cycling and public transport) states the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

5.66 In line with Policy T2, given the site's very high accessibility to public transport (PTAL 6B) no car parking spaces are proposed as part of the application.

5.67 Specific to cycling the policy states in order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3).

5.68 London Plan Table 6.3 requires the following cycle parking provision:

Land Use		Long-Stay	Short-Stay
C3-C4	Dwellings	1 space per studio and 1 bedroom unit 2 spaces per all other dwellings	1 space per 40 units

5.69 In line with Policy T1 and London Plan Table 6.3 above, there is a requirement to provide 11 cycle parking spaces alongside the proposed extension.

5.70 Several options to provide secure cycle parking provision have been explored as follows:

- **Internally at ground floor** – This is not an option given floorspace is already occupied by existing cycle parking for existing residents on site. This also has the potential to create a security and safety hazard for example blocking corridors and compromising fire escape routes.
- **Internally within new apartments** – This is not possible as the lift which serves the upper floors does not allow for bicycles to be transported to the upper floors via this means.
- **Within the car park to the rear** – Tracking of the existing rear car parking spaces indicates that stacked cycle parking is not an option given the constraints of the existing rear carpark.

5.71 As a solution to the above, seven cycle hoops (providing 14 cycle parking spaces) have been provided externally adjacent to the entrance of Mountview Lodge (within the application boundary). This provision is in excess of the London Plan requirement and therefore considered to be appropriate.

5.72 It is therefore considered that the application is fully compliant with policies T1 and T2 of the Development Plan.

Summary

5.73 This section discusses all relevant development plan and material considerations in respect of the application proposals, providing an assessment to demonstrate that the application accords with the provisions of the development plan.

5.74 The principle of development is justified in the context of development plan policies. This demonstrates that the site is suitable for a roof extension to provide additional homes. Additionally, there are several material considerations weighing in favour of the application proposals.

5.75 The benefits of providing 8 homes in a highly sustainable location are significant in contributing to Camden's housing target. Additionally the palette of materials, general design, layout and bulk and massing represent a strong response to the site's context.

6 Planning Obligations

6.1 This section considers the implication of Section 106 and Community Infrastructure Levy (CIL).

CIL

6.2 From 1 April 2012, a Community Infrastructure Levy (CIL) was introduced across Greater London to help fund the Crossrail development. Any development in Camden will be liable for Mayoral CIL. In Camden, the Mayoral CIL charge is £50 per square metre.

6.3 In addition, if granted planning permission, this proposed development will be subject to Camden's CIL Charge. The tariff came into effect from 1 April 2015. The Charging Schedule is index linked to the BCIS All-in Tender Price Index and elements relative to this proposal are set out as follows:

Type of Development	CIL Rates £ per square metre Net additional floorspace
Residential below 10 dwellings (or 1000 sqm)	£500 (Zone A Central)

6.4 In accordance with Regulation 40 of the Community Infrastructure Levy Regulations the following is calculated based upon the following assumptions:

- Proposed GIAm²
- Less qualifying affordable housing GIAm²
- Less existing floorspace (in lawful use for the prescribed period pursuant to the CIL Regulations 2010 (as amended) to be demolished) GIAm²

6.5 The CIL calculation is provided below, it should be noted that this is not index linked:

- Mayoral CIL = Total Proposed GIAm²: @ £50/m²: 617m² GIA
- LBC CIL = Proposed Residential GIA @ 500/m²: 617m² GIA
- Less proposed affordable GIAm²: 0m²
- Less existing floorspace in lawful use: 0m² GIA
- Total CIL = **£339,350.00**

6.6 Based on the adopted Mayoral CIL and the City of London CIL charges set out above, the CIL charge liable for the application proposals (non-indexed) amounts to **£339,350.00**

Section 106 Contributions

6.7 Camden Planning Guidance 8 relates to planning obligations and provides full details on how planning obligations operate. At the point of pre-application, it was advised that the following Section 106 planning obligations would be likely to form part of any future planning permission:

- Contribution towards affordable housing;
- Construction management plan (including monitoring);

- Car free development for new users;
- Highways contribution;
- Sustainability plan; and
- Energy efficiency and renewables plan.

6.8 Any S106 contributions will be the subject of negotiation during the determination period

Affordable Housing – Payment-in-lieu

6.9 As highlighted in Section 5, the application proposes to provide a policy compliant affordable housing payment-in-lieu in line with Policy H4.

6.10 A full accommodation schedule is provided at **Document 2**.

Additional Residential Floorspace	Capacity (rounded floorspace addition/ 100 sq m)	Affordable housing %ge target (capacity x 2%)	GEA (area schedule)	Affordable housing floorspace target (%ge target x GEA)	Payment in lieu required (floorspace target x £2,650)
617 sq m GIA	6 additional homes	12%	684.4	12% x 684.4 = 82.1	82.1 x £2,650 = £217,565

6.11 The GIA uplift for the proposed development is 617 sqm providing indicative capacity for 6 homes and a target contribution percentage of 12%. In order to calculate affordable housing contributions the Council uses GEA measurements, and in the absence of GEA measurements being provided the Council will apply a ratio of 1.25 to GIA figures to calculate the GEA. In this instance the GEA figure (684.4) is included within the area schedule (**Document 2**).

6.12 The payment in lieu is £2,650 per sqm which is the payment level for affordable housing. Using the methodology provided in the Council's guidance on Housing and Planning Obligations (above) this would indicate a contribution of **£217,565.00** for the development.

7 Conclusions

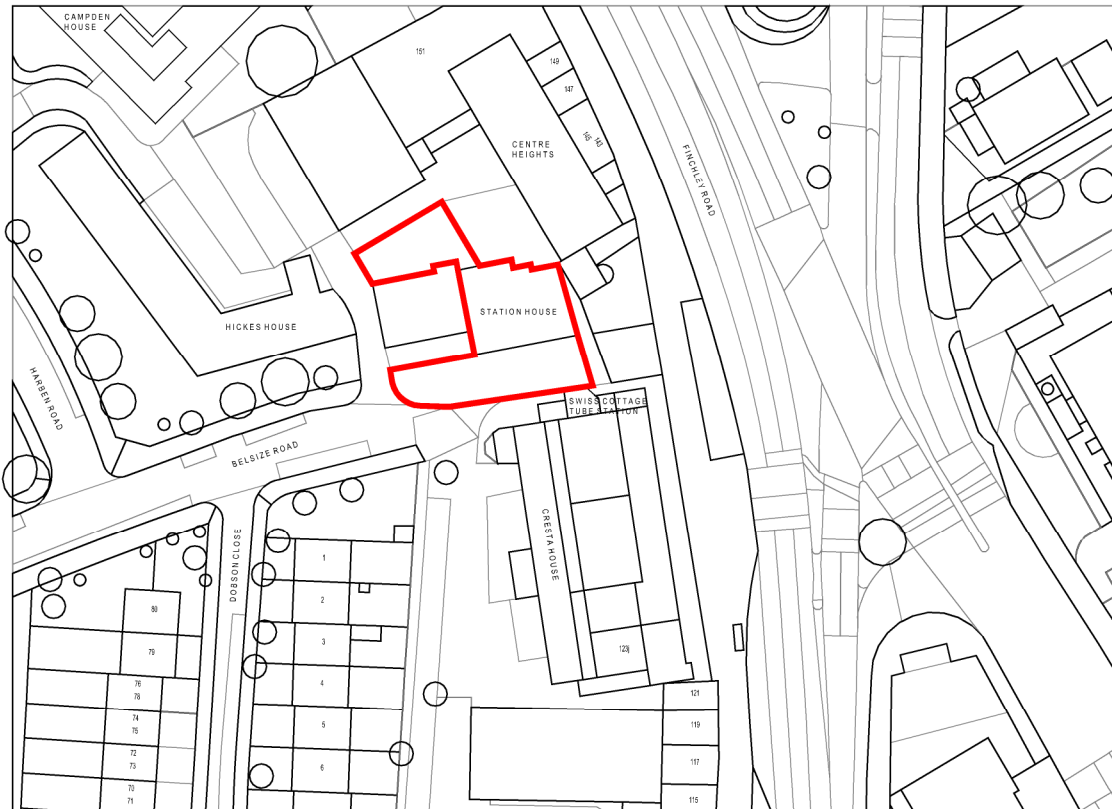
- 7.1 This Planning Statement has addressed a variety of planning considerations which arise as a result of the development proposed at Mountview Lodge. The Planning Statement is one of a suite of supporting documents which justify the proposed development, all of which should be read holistically.
- 7.2 To conclude the planning application should be granted planning permission for the following reasons. The proposal would:
- Facilitate the delivery of 8 much needed residential homes that fully comply with London Plan space standards.
 - Deliver units with level thresholds that follow the requirements set out in Part M of the Building Regulations.
 - Provide a range of apartment types ranging from studios to 2 bed, 4 person units, appropriate for the highly accessible location.
 - Deliver a high quality, carefully considered design solution, refined throughout the pre-application process with direct officer input.
 - Incorporate a sensitive palette of materials designed to mirror the existing building design whilst also providing a break in the building's articulation at 8th floor level;
 - Deliver 14 cycle parking spaces (in excess of the London Plan requirement), promoting the sustainable location of the site.
 - Maximise biodiversity at the site, delivering a new green roof and external balconies with greening opportunities for the units at 8th floor.
- 7.3 The NPPF states that where the development plan is silent or absent on a particular matter, then planning permission should be granted unless “any adverse effect of doing so would significantly and demonstrably outweigh the benefits” of the development. There are no “significant and demonstrable adverse effects” of this development that exist in the first instance. Secondly, even if there were, then they would not outweigh the “benefits” of the proposal.
- 7.4 This development proposal therefore accords with the up-to-date development plan. There are also significant material considerations which weigh in favour of the grant of planning permission.
- 7.5 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. This proposal is in accordance with the development plan, and in addition, there are other material considerations which strongly support the grant of planning permission, such as its compliance with the NPPF.



APPENDIX 1

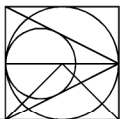
SITE LOCATION PLAN

1. Contractors must check all dimensions on site. Only figured dimensions are to be worked from. Discrepancies must be reported to the Architect or Engineer before proceeding. © This drawing is copyright
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Revision	Description	Drawn	Checked	Date
Preliminary <input type="checkbox"/>	Information <input checked="" type="checkbox"/>	Tender <input type="checkbox"/>	Construction <input type="checkbox"/>	As Built <input type="checkbox"/>

Woods Hardwick
Architects, Engineers and Development Consultants



Title **MOUNTVIEW LODGE, SWISS TERRACE
SWISS COTTAGE**

Details **SITE LOCATION PLAN**

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Scale **1:1250@A4** Date **MARCH 2018** Drawn **JA** Chk **DC**

18086 - P01



APPENDIX 2

AREA SCHEDULE

	GIA		BALCONY	
	m ²	ft ²	m ²	ft ²
SIXTH FLOOR				
Apartment 01	62.4	671.6		
Apartment 02	52.2	561.8		
Apartment 03	45.5	489.7		
SEVENTH FLOOR				
Apartment 04	70.8	762		
Apartment 05	61.3	659.8		
Apartment 06	45.5	489.7		
EIGHTH FLOOR				
Apartment 07	64.3	692.1	17.6	189.4
Apartment 08	63	678.1	22.6	243.2
TOTAL AREAS	TOTAL GIA		TOTAL GEA	
6th Floor	220.2	2370.2	242.5	2610.2
7th Floor	221.9	2388.5	243.3	2618.8
8th Floor	158.3	1703.9	177.3	1908.4
Roof	16.6	178.6	21.3	229.2
Total	617	6641.3	684.4	7366.8

18086 - Mountview Lodge New Floor Areas _ 2018-10-17

(Subject to change through design development)