

# Francis Gardner Apartments

## Response to Objections

### Planning Application 2020/0928/P

1. A planning application was submitted in February 2020, and validated on 5<sup>th</sup> March 2020, for the “*demolition of existing student accommodation building (Sui Generis) and erection of a seven storey plus basement student accommodation building (Sui Generis) with associated external works*” at 89-91 West End Lane, London. The application was accompanied by the following extensive set of plans and documents:

- 17060\_ex(-- )01 Location Plan
- 17060\_ex(-- )02 Existing Site Survey
- 17060\_ex(-- )03 Existing Site Elevations
- 17060\_ex(-- )04 Existing Building Plans
- 17060\_ex(-- )05 Demolition Plan
- 17060\_pl(-- )01 Proposed Site Plan
- 17060\_pl(9-)01 Existing Visual 1
- 17060\_pl(9-)02 Proposed Visual 1
- 17060\_pl(9-)03 Existing Visual 2
- 17060\_pl(9-)04 Proposed Visual 2
- 17060\_pl(9-)05 Proposed Visual 3
- 17060\_pl(20)01 Proposed Front Elevation
- 17060\_pl(20)02 Proposed Rear Elevation
- 17060\_pl(20)03 Proposed Side Elevation
- 17060\_pl(20)04 Proposed South Side Elevation
- 17060\_pl(21)01 Proposed Building Section AA
- 17060\_pl(21)02 Proposed Building Section BB
- 17060\_pl(23)01 Proposed Basement Floor Plan
- 17060\_pl(23)02 Proposed Ground Floor Plan
- 17060\_pl(23)03 Proposed 1st - 4th Floor Plans
- 17060\_pl(23)04 Proposed Fifth Floor Plans
- 17060\_pl(23)05 Proposed Sixth Floor Plan

- 17060\_pl(27)01 Proposed Roof Plan
- SY617-100-0001 General Arrangement - Ground Floor Landscape Plan
- SY617-100-0002 General Arrangement - Basement Level Landscape Plan
- SY617-100-0003 General Arrangement - Ground Floor External Paving Plan
- SY617-100-0004 General Arrangement - Basement Level External Paving Plan
- SY617-100-0005 General Arrangement - Ground Floor Boundary Treatment
- SY617-100-0006 General Arrangement - Basement Level Boundary Treatments
- SY617-100-0007 General Arrangement - Ground Floor Tree Strategy Plan
- SY617-100-0008 General Arrangement - Ground Floor Planting Strategy Plan
- SY617-100-0009 General Arrangement - Basement Level Planting Strategy Plan
- SY617-100-0101 Section A – A
- SY617-100-0102 Elevation B – B
- SY617-100-0103 Section C - C
- Planning statement
- Design and Access Statement including:
  - Waste storage and collection (section 4.03)
  - Accessibility statement (section 4.02)
  - Crime impact assessment (section 4.02)
  - Computer visualisations showing the development in context with its surroundings.
- Draft Delivery and Servicing Plan and Design
- Student Housing Management Plan
- Desk based archaeological assessment.
- Heritage Statement
- Basement impact assessment with appendices including Ground Investigation reports, flood risk and drainage
- Construction Management Pro Forma
- Drainage report
- Sustainable Drainage Systems (SuDS) Strategy (including Camden pro-forma)
- Sustainability statement (including BREEAM).

- Acoustic report.
  - Air Quality Assessment
  - Daylight and sunlight assessment.
  - Lighting assessment
  - Transport assessment and travel plan.
  - Landscaping scheme - refer to drawings SY617-100-0001 to SY617-100-0001 and SY617-100-0101 to SY617-100-0103).
  - London Healthy Urban Development's Rapid Health Impact Assessment Tool
  - Planning obligations / heads of terms.
  - Some documents were too large to submit online and a CD was subsequently submitted containing the following documents:
    - Preliminary Arboriculture Assessment
    - Preliminary Bat Roost Assessment
    - Preliminary Ecological Appraisal
    - Appendix B: Ground Investigation Phase 1 Desk Study Report
2. Following the submission of the application, approximately eighty letters of objection have been received, predominantly from residents of adjacent properties at Kings Gardens, 93 West End Lane, 97 West End Lane, 12 Smyrna Road, Smyrna Mansions and Gascony Avenue. A letter has also been received from West Hampstead Gardens and Residents Association (WHRA), The NW6 Residents Group and one from the Combined Residents Association of South Hampstead (CRASH). Eight letters of objection have been submitted from unknown addresses. A summary of the objections has been prepared by Keeble Brown and is attached at Appendix 1.
3. The main issues of objection relate to:
- Design impacts including:
    - Rational for redevelopment
    - Scale and massing
    - Heritage impacts on the Conservation Area
    - Amenity and privacy (including daylight/sunlight impacts)
  - Construction impacts (including traffic, dust, air quality etc)
  - Consultation
4. Some letters of objection also raise concerns regarding the level of detail submitted with the application. The application was submitted with an extensive set of accompanying drawings, assessments and reports as

detailed at paragraph 1 of this document. The application includes photomontages of the existing and proposed development in the street scene, including a view from the north and south. This allows an easy comparison of the existing and proposed and gives a clear presentation of how the proposed development will look in the street, over and above what can be understood using solely the submitted elevations.

5. This document is submitted as a response to the objections and each issue is responded to in the following sections and includes all representations submitted at the date of submission.

## Design

6. Design issues are among the most raised issue in the objections submitted. This includes objection to the demolition/replacement of the existing building, scale, massing, height, design of the rear and south elevations, overlooking and amenity impacts. These issues have been addressed in the detailed reports and assessments submitted with the application and are also responded to below.

### Design, scale and massing

7. The set of plans submitted with the application includes an outline of the existing building on the proposed site plan and proposed elevations, this allows an easy comparison of the existing and proposed building footprint. The design of the proposed development has evolved, as set out at section 4 of the Planning Statement, over a two year period and through detailed discussion with the London Borough of Camden (LBC) planning department and Local Review Body (LRB). The evolution of the design is also set out in the Design and Access Statement. The Applicant has presented to the LRB on two occasions, most recently in November 2019. The final design presented with the application takes on board comments raised by planning and LRB over this two year period and is considered to present a high quality replacement building which will have a positive impact on the site and wider setting. The LRB response from the November 2019 panel confirms *"agreement has been reached on the overall bulk and form of a new building, which is similar to the existing structure"*. The massing and expression of the new building has been chosen in order to mediate between the domestic scale neighbours and the larger mansion house. The proposed building would have a stepped plan, ridge lines and bay windows to transition between these varying scales in order to maintain the existing character of the area.
8. Some concern has been raised in the objections submitted regarding the proposed rear and southern elevations, which are less detailed in comparison to the front elevation. This approach has been taken deliberately to reflect the character of the conservation area which has theatrical front/main elevations with quieter rear elevations. These elevations have been simplified in relation to detail but the materials (brick, balustrade and metal work) are of a high quality and ensure these elevations are suitable for the location and context. Throughout the conservation area the buildings are more decorative at the front elevation with sides and rear elevations often being quieter and more reserved. This is reflected, in relation to materials, in the character appraisal for the conservation area which states the majority of buildings are faced in red brick but with yellow stock brick used for the back and sides of houses. The southern elevation has been designed without windows to avoid overlooking into Kings Gardens and increase privacy at this elevation. It is considered this is a significant improvement to the current condition and the improvement in relation to privacy impacts should be welcomed, particularly with the removal of the external stairwell at this elevation.

9. Comments were made by the LRB in relation to the main elevation, northern flank wall and internal layout and these have been taken on board in preparing the final design. However, no comments were received, or changes suggested in relation to the southern or western (rear) elevations. The LRB recommended the elevation details should be fine-tuned to simplify window designs and accentuate strong elements, such as the white glazed brick bands. The new rear elevation is a lot more simple and repetitive than the existing rear elevation which has a greater degree of articulation with shallow bay windows and the escape balconies etc. However, the simplicity of the proposed rear elevation was something that was encouraged at the Design Review Panel meeting stage, where the Applicant was encouraged to go further with the bay treatment to the front and go quieter on the design of the rear elevation. This is reflected in the current design submitted at application stage, following the extensive pre-application discussions.
10. The redevelopment of the site has focused on providing a high-quality development, using high quality materials. The design has developed over a number of years, in consultation with LBC and LRB, to arrive at the current design which is considered to be the most appropriate response to the site location and context, offering a unique opportunity to improve this part of the Conservation Area which currently has a neutral contribution to the character of the Conservation Area. It is considered the proposed development clearly complies with Policy D1 of the Camden Local Plan and Policy 7.6 of the London Plan.

#### Heritage impacts on the Conservation Area

11. The objections submitted raise concerns regarding the impact of the proposed development on the South Hampstead Conservation Area (SHCA). The existing building is not identified as making a positive contribution to the character of the SHCA as confirmed in the pre-application response from LBC, the LRB panel and the Heritage Statement submitted with the application. The Heritage Statement, prepared by The Heritage Collective considers the contribution the existing building makes to the SHCA and comes to the firm conclusion that Francis Gardner does not make a contribution to the character and appearance of South Hampstead Conservation Area such that there should be an automatic presumption in favour of its retention. In arriving at this conclusion, consideration has been given to the significant alterations and extensions over time, and the lack of architectural quality of the building. This conclusion is in keeping with Camden Council's opinion expressed in the Conservation Area Appraisal that this building makes a neutral contribution of the conservation area. Demolition in itself would not be harmful to the conservation area provided an appropriate replacement structure/s followed, as is the case.
12. In relation to the proposed development, the Heritage Statement confirms the proposal will result in a small change within the conservation area with the demolition of the building and replacement building. However, the existing building is of limited interest and the replacement is of sufficiently high quality in terms of detailing and overall form to have no material impact on the character and appearance of the conservation area, which is robust enough to undergo such a change without causing harm to significance. The design is appropriate for this setting and the conclusion of the Heritage Statement is that the proposed development will assimilate well into the existing residential context of the site as the additional bulk, scale and massing has been handled carefully, setting the roof top extension back from the street frontage and ensuring the adjacent buildings are not affected by the proposed new building. The window proportions and detail work well within the surrounding context and the modulation of the facades breaks down the bulk of the building and provides visual interest to the streetscape. This contrasts with the existing building, with its blank brick

elevations. The three bays provide a feature of interest.

13. Overall, in relation to heritage impacts, no harm is assessed to the heritage asset and paragraph 196 of NPPF is not engaged. The proposed development complies with the requirements of the NPPF, the London Plan and Policy D2 of the Camden Local Plan in delivering a scheme which respects the conservation area around it, while providing a high standard of new accommodation for the area.

Amenity and privacy (including daylight/sunlight impacts)

14. The objections submitted raise concerns in relation to amenity and privacy impacts, particularly in relation to daylight, the increase in the number of windows on the rear elevation and the proposed roof terraces.
15. Privacy and amenity have been key considerations in the development of the proposed application. Concern has been raised that the number of windows on the rear elevation has increased. There are 46 windows in the existing rear elevation (based on the windows visible to the surveyor) with a coverage of 55.8m<sup>2</sup>. The proposed rear elevation includes 44 windows with a total coverage of 55.2m<sup>2</sup>, therefore there is a small reduction in the coverage of windows on the rear elevation. The building line of the proposed development is no closer to the buildings to the rear than the existing building. This is clearly shown on the proposed site plan. Care has been taken when designing this elevation to balance the amenity needs of future residents to provide sufficient ventilation and daylight, but also to minimise any overlooking and privacy impacts on adjacent residents. The proposed windows are the minimum size required to provide adequate ventilation and sunlight whilst minimising overlooking on the residents to the rear. The southern elevation has been designed without windows to avoid overlooking into Kings Gardens and increase privacy at this elevation.
16. Some concerns have also been raised regarding the inclusion of roof terraces and the potential for a lower standard of living for student tenants. The primary reason for the redevelopment of the site is to bring the accommodation up to the standard required for modern accommodation which is simply not possible through refurbishment of the existing building. The current site is lacking sufficient amenities for the student accommodation and is not accessible. The proposed development offers a significant improvement with 290m<sup>2</sup> of internal amenity (gym, entertainment room, lounge etc) and 240m<sup>2</sup> outdoor amenity (including a sunken courtyard to the rear and a roof terrace) and also provides accessible accommodation. The LRB panel (November 2019) suggested the building would benefit from more green space and planting, and that the option of including an external communal roof garden should be explored. A small communal terrace has now been included adjacent to the communal lounge area on the top floor. This is well set back from the adjacent residential properties and is also provided to the street elevation, further minimising any impacts on adjacent residents. Individual terraces are provided on only four studios on the top floor and will have access by only four residents, again these are set back from the main elevations to minimise impacts on adjacent residents.
17. A Student Management Plan (SMP) has also been submitted with the application and a sample (confidential) tenancy agreement. This will require students to abide by a “good neighbour policy” as a condition of their tenancy. Any instances of excessive noise will be managed by the Applicant/Operator. These demonstrate the measures which will be implemented to ensure the student accommodation is managed to minimise impacts on adjacent residents. The SMP confirms the manager will be a member in good standing of the National Code of Standards for privately owned/managed student accommodations. The accommodation

will be registered with ANUK. The development, if approved, will be required to comply with the SMP through planning conditions and the s106 legal agreement. The site currently is not controlled by any s106 or planning condition requirement for a SMP and therefore the redevelopment allows the opportunity to bring these aspects of the student accommodation under control of the SMP to the benefit of adjacent residential amenity.

18. Loss of daylight has been the most commented upon issue raised in the objection responses. A Daylight and Sunlight Report has been prepared by eb7 in relation to the proposed development and was submitted with the planning application. The report considers the impacts on daylight of adjacent properties and demonstrates there are no significant impacts on the daylight available to adjacent residents as a result of the redevelopment of the site. To summarise:
  - 93 West End Lane - The results of the VSC assessment have shown that in all but one location the levels of daylight remain above the standard BRE target. The single exception is located on the rear elevation at third floor level (W4). Whilst the window receives a reduction of 0.7 times its former value (below the 0.8 target), the further NSC result for this bedroom shows that there will be no impact at all to the distribution of light within the room. This suggests that the impact to daylight within this room will not be noticeable to occupants. The results for the ASPH assessment have shown that all windows would retain levels of sunlight above the standard BRE targets.
  - 15-64 Sidney Boyd Court - The results of the VSC assessment have shown that in all location the levels of daylight remain above the standard BRE target. The results for the ASPH assessment have shown that all windows would retain levels of sunlight above the standard BRE targets.
  - 1-50 King's Gardens - The results confirm that in all locations the VSC, NSC and APSH would retain levels of daylight and sunlight above the standard BRE targets. The results confirm that in all locations the VSC, NSC and APSH would retain levels of daylight and sunlight above the standard BRE targets.
  - 1-8 Smyrna Mansions – The results confirm that in all locations the VSC, NSC and APSH would retain levels of daylight and sunlight above the standard BRE targets.
  - 12 Smyrna Road – The results confirm that in all locations the VSC and NSC would retain levels of daylight above the standard BRE targets. The assessment of the development on this property is fully consistent with BRE guidance.
  - 76 Gascony Avenue - The results confirm that in all locations the VSC, NSC and APSH would retain levels of daylight and sunlight above the standard BRE targets.
19. The detailed daylight and sunlight report therefore demonstrates the impacts on daylight and sunlight of adjacent residents are acceptable.
20. Overall, it is considered the proposed development clearly demonstrates compliance with the London Plan Policy 7.6 B (d), Policy 7.15 and the Camden Local Plan Policies A1 and A4 in relation to amenity. This is demonstrated through the various reports submitted with the application, including Table 4 of the Planning Statement.

### Rational for redevelopment

21. The objections submitted have raised concerns regarding the rationale for the redevelopment of the site. As recognised in the objections submitted, the site has undergone a number of redevelopments over the years. The Archaeology Report submitted with the application dates the present building back to the early 1900s, with major renovations and repairs taking place following bomb damage during the Second World War and the building was converted into Carlton Mansions by 1953. There have been further changes to the site in more recent years with the building converted and refurbished in 2004/2005. As the existing building has undergone significant alterations and extension over time, as a result, it has a complex internal layout with stairs linking different levels. The building does not provide access for all. These alterations have significantly compromised the viability of the existing property for any further conversion and in its present form building cannot offer the quality of accommodation that is required. The proposal to demolish and rebuild was taken after careful consideration. The proposal presents the opportunity not only to create a building that meets modern standards of accommodation and sustainability but also contributes in a positive way to the streetscape and character of West Hampstead.
22. These reasons have been explained to LBC and LRB during the extensive pre-application discussions. The recent report from the LRB states *“while the panel understands the reasons for demolishing and replacing the existing building, it would encourage reuse of the building fabric wherever possible to reduce climate impact”*. The Applicant takes on board these comments, noting the concerns regarding the demolition of the existing building relate to sustainability concerns rather than a preference to retain the existing building. It is unlikely the bricks can be reused on site but there may be potential to reuse some materials within the local area or to remove the materials in a more sustainable way. The potential to reuse some of the existing building fabric is something that can be considered post consent and can possibly be considered as part of the Construction Management Plan or BREEAM requirements.
23. Whilst it has been possible, in the past, to refurbish the building to improve the standard of accommodation it is considered there is no further to scope to improve the existing building. The proposed development will provide a building which has a positive contribution to the character of the area, offers improved accommodation, better communal and external spaces, accessible and sustainable accommodation and a chance to provide an increased amount of student accommodation without compromising the Council's priority to deliver self-contained homes.

### Construction

24. It is clear from the objections submitted that construction issues are, understandably, a concern for local residents. These elements have been considered, as far as possible, in the application documentation. For example, the Air Quality Assessment by REC Ltd confirms the potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of demolition, earthworks, construction and trackout activities from the site. The assessment follows current and appropriate guidance and methodology and has presented a robust and conservative assessment and is in accordance with Greater London Authority methodology. Assuming appropriate mitigation measures are implemented, air quality impacts during the construction phase are considered to be acceptable for a development of this size and nature. Section 5.1.5 of the report sets out appropriate mitigation measures including for site management,

preparing and maintaining the site, operations, water management, demolition, construction and trackout. The mitigation measures provided to reduce the risk during the demolition and construction phase are presented for a “medium” risk site. Assuming the relevant mitigation measures outlined in Table 17 of the report are fully implemented, the residual effect from all dust generating activities is predicted to be not significant, in accordance with the GLA guidance. The Applicant has also confirmed, in the CMP pro-forma, that the Construction Logistics and Community Safety (CLOCS) standard will be abided by during construction. The Applicant team’s current assumptions are contained in Section 20 of the pro-forma and will be developed with both the demolition and main contractor during contract negotiations and incorporated within the contract conditions. This will help to ensure traffic is managed appropriately during construction stage. These assumptions are copied below for ease of reference:

- Deliveries will be contained wherever possible between 0930-1630 each day and 0800-1200 on Saturday.
  - A hardstanding will be constructed within the curtilage of the property and all deliveries will be marshalled onto site.
  - The hardstanding will be regularly cleaned to eliminate any earth being carried off site onto the carriageway.
  - A wheel washing facility may be required dependent upon construction phase.
  - All vehicles will be accommodated within the curtilage of the site for loading/unloading.
  - Full time traffic marshals will be employed at the site entrance and exit managing vehicle interface with pedestrians and road traffic.
  - All deliveries will be made using a booking in system to ensure no vehicles are waiting on West End Lane at any time. The system will be managed by the Principal Contractor. The booking system is likely to be governed by a logistics manager, deliveries booked 24 hours in advance, advised to site 30 minutes prior to estimated time of arrival.
  - All suppliers will be advised of and sign up to this system prior to orders being placed.
  - The use of local suppliers will be encouraged to reduce the impact on the wider road network.
  - Any exceptional deliveries such as tower crane erection and dismantling will be arranged and agreed in advance with TfL.
25. The overall duration on site is anticipated as 23 months for both the demolition and construction and working hours will be within the standard Camden working hours. The effect of any noisy or dusty work will be minimised by all means available and comply with Camden’s Minimum Requirements for Building Construction (CMRBC). Concerns raised about damage to adjacent buildings will be controlled through the party wall process. In any case, the Basement Impact Assessment (BIA) submitted with the application concludes the damage categories for each of the adjacent structures during the various phases of development are largely confined to Category 1 (Very Slight) or below and as such, there would not be any cause for concern.
26. Overall, it is considered that construction impacts will be acceptable, subject to mitigation being implemented during construction. The detailed Construction Management Plan cannot be completed until a

contractor is on board and this cannot happen until planning permission is granted. Construction impacts will be carefully controlled through a s106 legal agreement, should planning permission be granted. LBC will require a Construction Management Plan and consultation with the local community will be required as part of this, including a Community Working Group. As this will be included in any s106 the Applicant will have a legal obligation to comply with the requirements (including controlling hours of working and impacts on noise, dust, traffic etc). This will ensure not only that the construction stage is adequately managed, but also that local residents are well informed about the construction programme and activities. The Council will expect ongoing engagement with neighbouring residents, businesses and organisations during the course of the works. If planning permission is granted, it is anticipated that regular updates and newsletters will be circulated as part of the ongoing consultation with the local community.

## Consultation

27. The National Planning Policy Framework (NPPF) encourages early engagement and good quality preapplication discussion to enables better coordination between public and private resources and to improve outcomes for the community. Paragraph 40 of the NPPF states:

*“Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community.”*

The Applicant engaged in a two-year pre-application discussion process with the London Borough of Camden (LBC) prior to submission of the application and also carried out a community consultation process from December 2019 to April 2020.

### Pre-Application Discussions with LBC

28. The Applicant has been engaging with the London Borough of Camden on the proposed redevelopment of the site since October 2017. The pre-application discussions allowed issues such as the principle of the use, redevelopment, design, scale, massing etc to be discussed and developed over a two-year period, including two presentations to the Design Review Panel. Some concerns are raised in the objections that this pre-application discussion is not available to the public. The pre-application discussion with the Council is fully set out at section 4 of the Planning Statement and the development is also set out at section 3.04 of the Design and Access Statement. Images of the original proposal (Figure 3 of the PS) and the proposal presented to the Design Review Panel in November 2019 (Figure 4 of the PS) are contained within the Planning Statement. The progression from the original proposal to the current application design can clearly be seen through a simple comparison of these images. The PS sets out the most changes which have been made since the November 2019 Design Review Panel including the change to a triple bay façade (third bay added on the north-west corner of the building), extending the bays to fifth floor at all three bays and internal rationalisation of the floorplan. The application documentation provides a clear and transparent summary of the pre-application discussions to allow the public to see how the proposal has progressed over the two-year period prior to submission.

#### Pre-Application Community Consultation

29. Several objections raise concerns regarding the pre-application consultation process with the local community. As noted in the objections, pre-application consultation is encouraged in NPPF and in the LBC Statement of Community Involvement (SCI). However, pre-application consultation is not mandatory or a statutory requirement. As stated in the LBC SCI (para 3.9), “*we cannot require a developer to undertake pre-application discussions or pre-application consultation*”. The Applicant did however choose to carry out a pre-application consultation with the community. The Applicant’s Statement of Community Involvement and the Planning Statement submitted with the application clearly set out the extensive pre-application which was undertaken in advance of the submission of the application. A full log of stakeholder engagement is set out at p17 of the SCI and is summarised below:
- Event held on Monday 16<sup>th</sup> December 2019 at the at Kingsgate Community Centre from 12pm – 7.30pm (from 12pm for local councillors and from 2pm for all other members of the public).
  - Leaflets delivered to approximately 500 residents in the vicinity in advance of the consultation.
  - Editorial and advertising placed in the local weekly newspaper for two weeks prior to the event.
  - Project website (<http://www.francisgardnerapartments.co.uk/>) set up to provide details on the consultation event which went live on 22nd November 2019. The website has been kept up to date with new information and contact details of the project team.
  - Freephone number and email address set-up and provided on all communication efforts.
  - Personal letters, emails and telephone calls were sent/made to various stakeholders including local residents, politicians, freehold directors and community groups.
  - Engagement (phone calls) with local property agents to canvas for feedback from absent owners selling or renting out local property.
  - Meeting with Kilburn Neighbourhood Plan Forum on 29th January 2020.
  - Meeting with freeholders of 97 West End Lane on 04 February 2020.
  - Meeting with the managing agent of Kings Gardens on 02 March 2020.
30. The consultation event was held for a 7.5-hour period with 5.5 hours being open to the public and at least ten members of the project team were available to answer questions or discuss the proposal. At the consultation event a total of twelve A1 information boards were presented with information on the project and a 3D scale model was presented of the site and surrounding area. Uniquely, the 3D model had an insert for both the existing and proposed building at Francis Gardner (see Figures 1, 2 and 3). This allowed members of the public to interchange the buildings and get a feel for the extent of change at a much deeper level than is available through 2D images. The model remains available for use if required to assist the application process.



*Figure 1: 3D scale model of the site and surroundings presented at event (proposed building)*



*Figure 2: Close up of proposed building 3D scale model*



Figure 3: Close up of 3D scale model of existing building (left - side view, right – aerial)

31. It is disappointing to receive negative feedback on the consultation process, which was extensive, well-advertised and delivered effectively using methods that are considered to go above and beyond the normal requirements. The information available at the event remains available on the project website and the 3D model which was used at the consultation event can be made available for viewing by LBC if required. The Applicant has endeavoured to make it clear, throughout the consultation process, that the consultation event in December 2019 marked the beginning of the community consultation rather than being a single event. The Statement of Community Involvement presents an accurate representation of all pre-application consultation with the local community and the Applicant looks forward to continuing to work with the local community as the project evolves.

## Conclusion

32. This document is submitted in response to objections submitted for the planning application to redevelop the site at 89-91 West End Lane. The proposal is to demolish the existing building and redevelop on a similar scale and footprint. The existing site has an established use as student accommodation and the application allows an opportunity to formalise the use while providing a high-quality building both internally and externally. The design of the proposed development has evolved in discussions with the London Borough of Camden over a two-year period including two presentations to the Design Review Panel. The Design and Access Statement sets out in detail how the design has developed. The Applicant began consultation with the local community in December 2019 and will continue to ensure the local community is kept informed of the proposed development. This will continue through to construction stage if the application is approved.
33. The application is supported by a significant number of reports which consider the issues raised by objectors in some detail and, in totality, demonstrate compliance with the London Plan, Camden Local Plan and relevant supplementary guidance. The proposed development offers a high-quality replacement building which, having taken account of the character and appearance of the Conservation Area, will be a positive addition to the area. It is also a highly sustainable building, offering a significant improvement on the existing building. The proposed development is targeting BREEAM (2018) “Excellent” which will make it amount the top 10% of new non-residential buildings in the UK in relation to sustainability.