

22 March 2022



Sean Ernsting
The Planning Inspectorate
Room 3D, Temple Quay House
2 The Square
Bristol
BS1 6PN

Nigel Dexter
E: ndexter@savills.com
DL: +44 (0) 20 7420 6374
F: +44 (0) 20 7016 3769

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Via email only to west2@planninginspectorate.gov.uk

Dear Mr Ernsting

100 Avenue Road, London, NW3 3HF
Your Ref: APP/X5210/W/21/3286810

On behalf of the Appellant, Essential Living (Swiss Cottage) Ltd, following receipt of the London Borough of Camden's Statement of Case and some third party representations, please find set out below some final comments in response.

In accordance with normal practice, these comments do not introduce new materials or repeat matters already set out in the Appellant's Statement of Case or the original Application documents but simply clarify matters arising from the LPA's Statement of Case and the third party representations. This note should therefore be read alongside those other documents.

LPA Statement of Case

The general assertion from the LPA throughout their Statement of Case, that the quality of the proposed GRC for the building's frame is not sufficient, is addressed and shown to be misplaced throughout the Appellant's previously submitted documents. The high quality of the proposed material is clear and general commentary on this quality does not need to be repeated here. The Inspector is instead respectfully requested to view the full pack of documents that address this matter.

It should also be restated that the imposition of Condition 18 by the Inspector determining the original application (Ref: APP/X5210/W/14/3001616) on this site sets a clear position that the final choice of materials and finishes were intended to be secured at a later stage. The application that is the subject of this Appeal is the outcome of an extended period of design development to select materials that deliver not only in terms of the appearance of the building but also in supporting sustainability and minimising construction impact.

With regard to specific elements, the following comments are offered.

Appearance and Weathering of GRC Frame

- GRID Architects have offered a detailed assessment of the appearance and weathering of GRC versus other stone or stone-like materials. The LPA's Statement of Case simply notes again that they dispute the quality of the GRC versus other materials in spite of the expert assessment offered by GRID Architects.

- The overall quality of the material is confirmable only through an inspection of the sample materials provided within the Visual Mock-Up (VMU) and the potential viewing of other completed buildings that adopt the same material.
- The Inspector is therefore invited to reach their own view in the context of the extended period of design assessment and evolution that has led GRID Architects to make their recommendation.

Jointing

- The LPA re-state a position of wanting to minimise the amount of jointing within the frame of the building. The proposed GRC material allows for a minimal number of joints and certainly far fewer than would be needed if natural stone or other artificial stone options were used. This is amply demonstrated at Section 05 of the *GRC Proposals Document (December 2020)*, prepared by GRID Architects.

Sustainability

- It is asserted by the LPA at paragraph 6.2 of their Statement of Case that the sustainability benefits of the proposed GRC material versus other stone or stone-like materials have not been evidenced by the Appellant.
- This statement is incorrect; an assessment of sustainability with relevant data is provided at Section 07 of the *GRC Proposals Document (December 2020)*, prepared by GRID Architects.

Use of Metal Cill

- A full case has been previously provided by GRID Architects setting out the reasoning and requirement for the use of a metal cill to minimise staining 'bleeds' to the frame material and that this would be required irrespective of the specific natural stone, reconstituted stone, artificial stone or alternative materials that could be used.
- The specific concern raised by the LPA is that this cill may stand out from the elevation. At p. 16 of GRID's Technical Response document dated 12.08.2021 it is clearly offered that the metal cill would be coloured to match the GRC of the main frame; this approach addresses any concern in regard to the cill standing out.
- The evidence of the need for such a cill, and the LPA pushing back against it on the grounds that it is not necessary, also sits at odds with their assertion elsewhere in their Statement of Case that the proposed GRC will not weather or age. Clearly, the GRC will weather and the proposed cill plays a role in achieving this in a consistent way.

Relationship with Swiss Cottage Library

- A full assessment of the relationship between the Appeal Site and the adjacent Swiss Cottage Library has been set out across the Appellant's submissions and most particularly within the *Submission of Details: Façade Materials Heritage Assessment (June 2021)*, prepared by Turley.
- The comments noted within the LPA's Statement of Case do not add anything further to the case previously stated and this has been fully addressed within other documents and particularly that prepared by Turley.

Third Party Comments

The submissions from Mr T Ewing and Mr T Symes (on behalf of the Belsize Society) are noted. The majority of what has been set out has already been addressed either above or in previous submission, however the following additional commentary is noted:

- Both submissions simply state that the proposed GRC is not a high quality material but offers no justification or reasoning for that statement.
 - o Conversely, detailed evidence from GRID Architects has been presented that sets out not only the high quality of GRC in terms of its visual appearance but also how it out-performs other stone or artificial stone materials in matters including sustainability, reducing wastage during installation, simplified and safer construction processes and weathering and maintenance in the longer term.
 - o This evidence should be considered by the Inspector in their decision-making.
- Both submissions imply that the choice of materials has been driven by financial reasons. However, the body of evidence presented and design assessment previously undertaken by GRID Architects clearly demonstrates that the selection of material is based upon the quality that can be achieved through the use of GRC.
- Mr Symes' statement incorrectly asserts that the Appellant's Statement of Case sets out that London Plan policies are irrelevant to assessment of the proposed development. Indeed, Mr Symes's statement goes on to quote paragraphs of the Statement of Case where an assessment of relevant London Plan policies has been completed.
 - o For the avoidance of doubt, relevant London Plan policies have been assessed. The Appellant's Statement of Case has then highlighted that the principle of the relevant policies of the current London Plan today are the same as the equivalent policies that were contained within the London Plan valid at the time of original determination in 2016. As such, the context in which these proposals are assessed has remained consistent since the original application for development of this site was determined in 2016.
- The recent appeal decision ref: APP/X5210/Q/21/3276844, relating to changes to the provision of affordable housing within the approved development, is not relevant to the assessment of materials for the external appearance of the building that is the subject of this current Appeal.

Summary

The above commentary has clarified a small number of points arising from the LPA Statement of Case and third party comments. These should be read in the context of the Appellant's own Statement of Case and the full package of application materials previously provided in determining this Appeal.

I trust that everything is in order. If any further information is required, please do not hesitate to contact me using the details set out at the head of this letter.



Yours sincerely

NJ Dexter

Nigel Dexter
Associate