

# **Residential Development 3-11 Lancelot Place SW7 1DR**



## **Planning Statement**

**tp bennett**  
for  
**High Point Estates Ltd**

**February 2019**



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## 1 INTRODUCTION

- 1.1 This Planning Statement is submitted in support of a planning application by High Point Estates Ltd for redevelopment of an existing residential site in Knightsbridge to replace 5 single family dwellinghouses.
- 1.2 The Local Planning Authority for the site is Westminster City Council (WCC).
- 1.3 The proposals are for the redevelopment of Nos. 3-11 Lancelot Place to provide five single family dwellinghouses (Class C3) comprising two basement levels plus sub-basement plant room, (as implemented under planning permission reference 15/10163/FULL), ground, first, second and third floor levels.
- 1.4 This Planning Statement assesses the proposals against the policies in the Development Plan and other material considerations. The Statement is structured as follows:
- Section 2 – provides detail of the application proposals
  - Section 3 – briefly describes the site and surrounding area
  - Section 4 – outlines the site’s planning history and pre-application engagement undertaken by the applicant
  - Section 5 – provides an overview of the principal planning policy and guidance relevant to the assessment of the proposed development
  - Section 6 – provides an assessment of the proposal against the provisions of the Development Plan and other material considerations
  - Section 7 – considers the likely approach to planning obligations
  - Section 8 – conclusions
- 1.5 This Planning Statement should be read in conjunction with the following documents which form part of the planning application:
- Application form and certificates (online)
  - Site location plan, existing and proposed drawings (tp bennett)
  - Design & Access Statement (tp bennett)
  - Townscape & Heritage Assessment (tp bennett)
  - Statement of Community Involvement (Four)
  - Energy & Sustainability Statement (Libra Services)
  - Sunlight & Daylight Study (GIA)
  - Arboricultural Assessment (BTC)

## 2 PROPOSED DEVELOPMENT

2.1 This planning application is seeking permission for an alternative design to an approved and part implemented redevelopment. The extant permission (reference 15/10163/FULL) relates to a similar proposal for 5 family dwelling houses, approved in 2016:

*"Demolition and redevelopment of Nos. 3-11 Lancelot Place to provide five single family dwelling houses (Class C3) comprising two basement levels (plus sub basement plant room), ground, first and second floors levels."*

2.2 While this is a new application, the scale of change proposed to the extant consented scheme was advised by Council officers to be outside the scope of a minor material amendment to that consent and that, therefore, a fresh application was required for the entire redevelopment as proposed to be revised. However, the substantive issues have been addressed through the extant consent, including the basement provision.

2.3 The terrace of five houses previously occupying the site has been demolished and excavation of the approved two basement levels has commenced, in co-ordination with an adjacent approved development, at 15 Lancelot Place, also currently under construction.

2.4 The proposals for the site relate to the above ground element of the development where approval for a different design of townhouse is sought on the same footprint as the extant consented scheme.

2.5 As described in detail in the accompanying Design & Access Statement and scheme drawings, the development comprises:

- 5 family sized townhouses, each with 5 bedrooms arranged over four above ground levels (incorporating a mansard top level) and two basement levels
- A consistent scale, massing and appearance that retains a terraced layout, with individually identifiable dwellings fronting Lancelot Place, more befitting of the emerging character of the street
- Attractive contemporary architecture that is respectful of its historic context whilst creating its own identity
- High quality façade finishes incorporating a locally appropriate palette of materials
- Usable front garden and rear terrace areas at ground level that incorporate light wells for basement accommodation below
- 'Mansard' level accommodation that creates space for greening and incorporates a step back front and rear to maximise sunlight and daylight penetration at street and rear garden levels
- Inventive internal arrangement and architectural treatment that minimises the interlocking between buildings that is characteristic of high density urban environments

- A highly efficient building environmental performance; highly insulated, low energy consumption from renewable sources and zero emissions
- A significant contribution to the local Community Infrastructure Levy, 25% of which will be available for allocating to projects in the Knightsbridge Neighbourhood Forum area

2.6 The differences with the extant consented scheme are the increase in height and size of dwellings (up from four bedrooms) and the change in external appearance. There is no alteration to the volume and footprint of the consented basement. The consented scheme attracted no CIL contribution, it being approved prior to the adoption of a charging schedule by Westminster City Council.

### 3 SITE AND SURROUNDING AREA

#### 3.1 The site

- 3.1.1 The 432sqm (0.04ha) site is within the administrative boundary of WCC.
- 3.1.2 A detailed analysis of the site and surrounding area is provided in the submitted Design & Access Statement.
- 3.1.3 The application site currently comprises a cleared site, part way through construction of a consented redevelopment.
- 3.1.4 A terrace of five family dwelling houses previously occupied the site (see below). These buildings dated from the 1950s, constructed in a neo-Georgian style and comprised ground floor and two upper storeys, the top level being a pitched roof with dormer windows back and front.

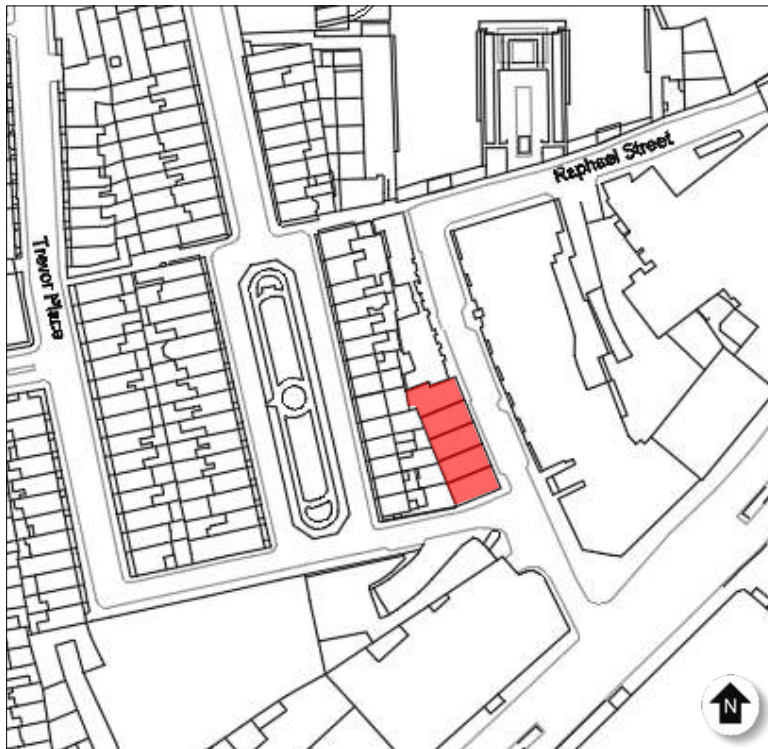


**Above:** The terrace of five dwelling houses that occupied the site (prior to demolition)  
**Below:** Street elevation showing the pre-existing relationship with the now demolished No. 15 Lancelot Place (outline of Trevor Square properties in grey)



- 3.1.5 The site has the benefit of planning permission granted in February 2016 for five replacement family dwellinghouses (reference 15/10163). Details of the approved development are included in Section 4, Site history & pre-application engagement.

3.1.6 The site location is shown in the plan below.



Above: Site location plan

### 3.2 The surrounding area

- 3.2.1 A retained rear garden wall forms the boundary with Knightsbridge Conservation Area to the west and immediately beyond are the gardens and backs of houses fronting Trevor Square, which are grade II listed buildings.
- 3.2.2 The immediate townscape is of mixed character and scale. The conservation area and listed buildings to the west are in residential use with buildings mainly dating from the early/mid-nineteenth century period.
- 3.2.3 To the east and south the scale of development is substantially different, with significantly larger buildings in a mix of uses, including residential, retail and office, in predominantly mid to late twentieth century buildings.
- 3.2.4 As such the smaller buildings that previously occupied the west side of Lancelot Place, including within the application site, represented the interface between the larger modern buildings to the east and the older and more modestly scaled properties to the west.





**Above:** Aerial view of site (highlighted red) and its surroundings prior to demolition of pre-existing dwelling houses (source Google Earth)

3.2.5 In terms of the immediate site setting, the west side of Lancelot Place was occupied by buildings out of character with:

- the 4 storey plus basement historic townhouse scale of the Conservation Area;
- the monumental scale and mass of the 10 storey mid 20th Century apartment building and Harrods Depository building to the south;
- the modern apartment and office complex rising to 12 storeys to the east
- and the Knightsbridge Apartments rising to 11 storeys on higher ground to the north.

3.2.6 The proposals described here seek to address this varied local townscape, providing a carefully considered contextual design that attempts to unify the disparate elements, existing and emerging, found within the site's immediate setting.

## 4 SITE HISTORY AND PRE-APPLICATION ENGAGEMENT

### 4.1 Planning history

4.1.1 The individual properties (Nos. 3-11) have recent planning history. The details of the most recent relevant extant consent covering the entire site (which is part implemented) is set out in the table below, followed by the application history for individual properties over the previous three decades.

<b>Reference</b>	<b>Description of development</b>	<b>Decision/date</b>
15/10163	Demolition and redevelopment of Nos. 3-11 Lancelot Place to provide five single family dwellinghouses (Class C3) comprising two basement levels (plus sub-basement plant room), ground, first and second floor levels.	<b>Approved</b> 23 February 2016
17/01814/ADFULL	Details of Construction Traffic Management Plan pursuant to condition 4 of planning permission dated 23 February 2016 (15/10163/FULL).	<b>Approved</b> 01 March 2017

#### 4.1.2 **3-7 Lancelot Place (excludes Nos. 9 and 11):**

Permission was refused in 2013 for the demolition and redevelopment of 3, 5, and 7 Lancelot Place to provide three dwellinghouses comprising two basement levels, ground, first and second floors. The reasons for refusal sited bulk, height, detailed design, the impact on the character and appearance of the adjacent Conservation Area and the impact on the amenity of the adjoining property at 9 Lancelot Place.

A subsequent appeal was dismissed on the grounds of detailed design and impact on No 9. However, the Inspector rejected the Council's case relating to bulk, height, character and appearance, stating in his decision that "*the form and bulk of the new building would not be disproportionate with existing development, and would therefore not be harmful to the character or appearance of the area*".

#### 4.1.3 **3 Lancelot Place:**

In 1991, permission was granted for the partial reconstruction of the house to include an additional mansard storey and rear extension.

In 1992, permission was granted for the amalgamation of Nos. 3 and 5 into one dwelling house. Subsequent to this, permission was granted for various alterations to the roof in connection with the use of No. 3 and No. 5 as a single house.

In 1993, permission was granted for rear extensions and roof alterations in connection with the continued use of 3 and 5 as two separate dwellings.

#### 4.1.4 **7 Lancelot Place:**

In 1994, permission was granted for a roof extension with dormer windows and a new rear conservatory at ground floor level.

Subsequently, in December 1994, permission was then granted for a full width ground floor extension and first floor extension along with a revised mansard design to the roof extension.

4.1.5 **9 Lancelot Place:**

In 1995, permission was granted for a two storey rear extension with single storey conservatory extension.

4.1.6 **11 Lancelot Place:**

In 2013, permission was allowed at appeal for works including the excavation of a basement, creation of lightwells and erection of extensions. This application was not implemented.

In 1998, permission was granted for the erection of a mansard roof extension.

**4.2 Other nearby permissions**

4.2.1 **15 Lancelot Place**

Permission was granted for the demolition and redevelopment of the existing buildings to provide two replacement buildings at ground and two upper levels and excavation of part two/ part three storey basements, to create 1 x 5 bedroom unit and 2 x 1 bedroom units with associated roof gardens and terraces, car parking and cycle parking. A previous consent dating from 1995 had been part implemented. The approved scheme was considered on the same committee as the extant permission relating to the proposal site. Non material amendments were made to the permission. This development is currently under construction.

The Council planning committee report granting consent for the original scheme noted the following:

*"The scale and bulk of the proposed buildings is greater than the existing buildings on the site, and also compared with the existing (and proposed) buildings to the south at 3-11 Lancelot Place. They would not however be unduly greater in scale or bulk compared with the buildings which were approved to be built by the 1995 approval and as such, in combination with the comparison of architectural merit, this increase is considered to be acceptable. Whilst the buildings would cause some minor harm to the setting of the adjacent listed buildings and conservation area through this very close scale, again this is not unduly more harmful than the 1995 approval and is partly mitigated and justified by the merits of the proposed new design."*

The applicant has also sought to closely co-ordinate construction activity, in particular demolition and joint working on excavation and piling of the conjoined basement areas in order to minimise disruption to the surrounding properties, the bulk of which are residential.

4.2.2 **Trevor Square (various)**

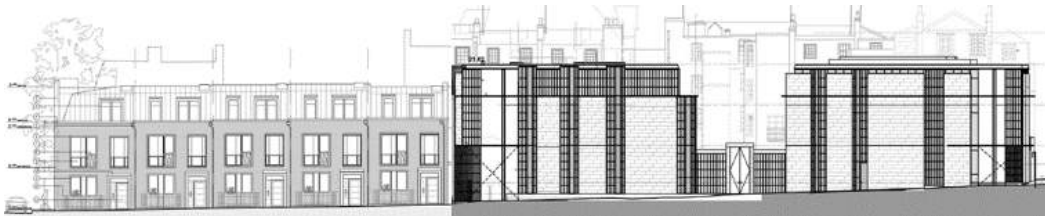
A number of permissions have been granted for extensions to the rear and roof levels of dwellinghouses that back onto the site with addresses in Trevor Square.

The design team has carefully analysed these property histories in order to build an accurate picture of the altered massing of these historic buildings, the location of habitable windows and to inform the design of the application site proposals.

**4.3 Conclusions on planning history**

4.3.1 A study of the planning history of Lancelot Place and its environs reveals a changing townscape of varied character that has emerged over a number of decades. Combined with the findings of the Townscape and Heritage Assessment, this has informed the application proposals and provided a robust baseline position for positive planning and sensitive and contextually appropriate design.

4.3.2 **15 Lancelot Place** - The design team has responded positively to this new neighbour and has sought to knit the application proposals into this emerging context. A key driver for revisiting the extant permission on the application site is that it no longer represents a sustainable high quality design given this new context, looking out of scale and conflicted aesthetically by drawing too much of its inspiration from a disappearing townscape.



Above: The extant consent scheme (left) alongside the extant consent scheme under construction for No. 15 Lancelot Place

Taken as an overall composition, the combined street frontage as approved presents a jarring and confused mix of styles and scales (see above).

4.3.3 **Trevor Square** – The planning history for properties in Trevor Square demonstrates the capacity of the historic townscape to accommodate sympathetic change and increases in height without harm to the character and appearance of the Conservation Area or the setting of the Grade II listed buildings. It is indicative also of the need for buildings to adapt to the changing needs of modern families, patterns of work and requirements for space.

A key driver for revisiting the extant permission on the application site was that new homes should be robust enough to meet the current and future demands for family sized dwellinghouses in the Knightsbridge residential market. The application proposals have been designed to offer some form of future proofing through the efficient use of volume, provision of generous internal space above the guidance minimums and utilising an efficient but flexible layout. This avoids the need for piecemeal future extensions to the properties.

#### 4.4 Pre-application engagement

- 4.4.1 The design of the application site proposals has been informed by extensive pre-application discussion and consultation with WCC, the Knightsbridge Association, Knightsbridge Neighbourhood Forum, local residents, businesses, workers, visitors and other interested parties and elected representatives dating back to late 2016. A series of meetings and consultation events have taken place where iterations of the scheme have been presented, discussed and amendments made in response to comments received. A detailed account of pre-application engagement is included in a Statement of Community Engagement (SCI) submitted with this application. The Design & Access Statement accompanying the planning application contains a visual account of the evolution of the proposals during the course of pre-application engagement.
- 4.4.2 Pre-application discussions resulted in the applicant and WCC entering into a Planning Performance Agreement in May 2018. That agreement is intended to cover the determination period of this planning application. In this spirit of collaboration, the applicant is committed to continuing the dialogue begun in the pre-application period and through public consultation (as described in the SCI).
- 4.4.3 The following is a summary of the key issues for stakeholders and consultees that emerged during pre-application engagement. These are further discussed and analysed in relation to planning policy in sections 5 and 6.
- 4.4.4 **Land use** - There was universal acceptance that a residential re-use of the site was the most appropriate land use. There was disagreement amongst those consulted regarding the size and character of residential units. Whilst there is some policy support for a mix of unit sizes, WCC made it clear in pre-application discussions that the way policy should be interpreted was that family dwellinghouses should be replaced by family dwellinghouses and that, for this site, this meant retaining five houses as opposed to a mix of family sized units (houses and apartments or maisonettes). An earlier alternative mix of unit types proposed by the applicant was subsequently dropped and the application site proposals have returned to a five townhouse format.

- 4.4.5 **Design** - There was general support for the proposed design approach and the appearance of the revised application site proposals was considered to be an improvement over the extant consented scheme, particularly in relation to the changing context of the west side of Lancelot Place. The key issue for some existing residents was the increase in height compared with the extant consented scheme and its potential impacts on townscape, heritage and residential amenity (see below). WCC were clear in their guidance that the proposals should be no higher than the adjacent scheme under construction at No 15 Lancelot Place and that the residential amenity of neighbouring residential properties should not be unacceptably compromised. The Knightsbridge Society welcomed the fresh architectural approach and did not object to the overall scale of the proposals.
- 4.4.6 **Townscape & Heritage** – There was a general consensus that the row of townhouses that used to occupy the site were not of sufficient townscape or historic merit to warrant retention. There was also broad agreement that a ‘terrace’ of houses was an acceptable typology upon which to base a revised proposal. Despite the proposals being no taller than the scheme under construction at No. 15, only 1.5m taller than the extant consented scheme, 1.9m taller than the pre-existing terrace and not as tall as either the townhouses in Trevor Square to the west nor the frontage to Lancelot Place on the east side of the street, some residents and their representatives still felt the application site proposals were too tall. They felt this would result in an unacceptable sense of enclosure to the street and the properties to the west (within the conservation area). The proposals have been carefully designed following a detailed study of context and result in a scale and sense of enclosure commonly found on residential streets throughout Knightsbridge Conservation Area.
- 4.4.7 **Residential Amenity** – There were some concerns that the proposals would unacceptably reduce sunlight and daylight levels within the street in Lancelot Place and rear gardens of Trevor Square properties. Studies into this were in an embryonic form when these proposals were discussed at pre-application stage and the application is now appropriately supported by a comprehensive analysis of these aspects. Despite the application proposals resulting in frontage to frontage and back to back distances being adhered to and improved upon on upper floors where possible compared with the extant consented scheme, residents were still concerned that their privacy would be affected. The design and orientation of above ground windows serving habitable rooms on the western elevation in the design have been very carefully considered in response. An above ground level balcony on one property was removed in light of the concern expressed by the immediate adjoining neighbour. Within a public street environment, there is little expectation for privacy equivalent to a rear garden and the proposals are not considered to have altered this.

- 4.4.8 **Construction Impacts** – Noise, traffic management and disturbance during construction was a key concern for residents when the extant scheme was originally proposed. As a consequence, a construction traffic management plan (TMP) was required by condition and approved by WCC prior to the construction activity on the application site commencing. The approved TMP is submitted with this application for information. A recurring message through consultation with local stakeholders and residents was that the works had been well managed to date with the on-site team being communicative, contactable, responsive and professional in their approach. Co-ordination of construction impacts with the adjacent development at No. 15 has been a key objective for the applicant with a commitment to minimise the magnitude of noise, traffic and disturbance by limiting the extent of simultaneous work on the two sites.
- 4.4.9 To be clear, the current construction activity on site relates to the implementation of the consented scheme (reference 15/10163/FULL).





## 5.2 National Planning Policy

- 5.2.1 National planning policy is contained in the National Planning Policy Framework (NPPF, 2018). It sets the primary point of reference for plan making and decision taking nationally and all regional and local policies should be aligned with its contents. It contains policy relating to land use, design, transport, climate change and process and procedure that development proposals should have regard to.
- 5.2.2 At the heart of the NPPF is a presumption in favour of sustainable development (para 11). Development proposals that accord with an up-to-date development plan should be approved without delay and applications for housing should be considered in the context of that presumption. Planning decisions should promote an effective use of land in meeting the need for homes, while safeguarding and improving the environment and ensuring safe and healthy living conditions (para 117).
- 5.2.3 Substantial weight is given to the value of using suitable brownfield land within settlements for homes (para 118). The NPPF promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing. For example, it supports opportunities to use the airspace above existing residential premises for new homes and encourages decision takers to allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene (para 118 c) to e)).
- 5.2.4 The NPPF states that planning decisions should support development that makes efficient use of land (para 122), taking into account:
- a. the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
  - b. local market conditions and viability;
  - c. the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
  - d. the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
  - e. the importance of securing well-designed, attractive and healthy places.
- 5.2.5 The NPPF places particular importance on planning policies and decisions avoiding homes being built at low densities, ensuring that developments make optimal use of the potential of each site (para 123). It also states (c) that *"in this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and*

*sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."*

- 5.2.6 Development should create pedestrian priority accessible places that are safe, secure and attractive and allow for the efficient delivery of goods, and access by service and emergency vehicles (para 110). Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (par 109).
- 5.2.7 The NPPF places great emphasis on achieving well-designed places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (para 124). Design quality should be considered throughout the evolution and assessment of individual proposals (para 128). Permission should be refused for 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, though where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development (para 130).
- 5.2.8 Development proposals that have the potential to affect heritage assets should describe the significance of assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (para 189).
- 5.2.9 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (para 196). When determining planning applications, local planning authorities should consider the desirability of new development in making a positive contribution to local character and distinctiveness (para 192 c)).
- 5.2.10 When determining planning applications for renewable and low carbon development, local planning authorities should a) not require applicants to demonstrate the overall need for renewable or low carbon energy and b) approve the application if its impacts are (or can be made) acceptable (para 154).
- 5.2.11 The NPPF states that the application of the presumption for sustainable development has implications for the way communities engage in neighbourhood planning (para 13 & 14). Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.

### 5.3 Regional Planning Policy

5.3.1 This application raises no strategic issues and is not referable to the Mayor. The London Plan 2016, consolidated with alterations since 2011, constitutes regional planning policy affecting the development of the site. Outside of the contribution the proposals make to meeting the strategic objectives of the plan, there are specific themed policies which directly apply to the determination of this application.

5.3.2 At time of writing, a draft new London Plan was published for consultation between December 2017 and March 2018. In accordance with section 338(3) of the GLA Act, the main issues arising from consultation are now being presented before a Secretary of State appointed panel to conduct an examination in public ("EIP"). Given the early stage of the draft plan pre-examination process and having regard to the tests set out in para. 48 of the NPPF, the policies of the emerging draft new London Plan are given little weight at the present time.

5.3.3 The relevant policies from the London Plan are:

- 3.3 Increasing Housing Supply
- 3.4 Optimising Housing Potential
- 3.5 Quality and Design of Housing Developments
- 3.8 Housing Choice
- 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- 5.2 Minimising Carbon Dioxide Emissions
- 5.3 Sustainable Design and Construction
- 5.6 Decentralised Energy in Development Proposals
- 5.7 Renewable Energy
- 5.9 Overheating and Cooling
- 5.10 Urban Greening
- 5.13 Sustainable Drainage
- 6.3 Assessing Effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.1 Lifetime Neighbourhoods
- 7.2 An Inclusive Environment
- 7.3 Designing out Crime
- 7.4 Local Character
- 7.6 Architecture
- 7.8 Heritage Assets and Archaeology
- 7.14 Improving Air Quality
- 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes
- 7.21 Trees and Woodlands

- 8.2 Planning Obligations

5.3.4 The degree of overlap and detailed interpretation provided by local policies within Westminster's City Plan, saved Policies within the UDP and the Knightsbridge Neighbourhood Plan is discussed in the Section 6.

#### **5.4 Local Planning Policy**

5.4.1 Local development plan policies for the area are contained within the City Plan (Nov 2016) and the Saved Policy contained in the UDP (2007). Clarification on policy as it relates to the provision of affordable housing and in lieu payments was given in April 2015, April 2015 and June 2017.

5.4.2 In accordance with Regulation 20 of the Neighbourhood Planning (General) Regulations 2012, WCC formally 'made' (adopted) The Knightsbridge Neighbourhood Plan on 11 December 2018. It is therefore now part of the statutory development plan for Westminster, and is to be used alongside the council's own planning documents and the Mayor's London Plan in determining planning applications in the Knightsbridge Neighbourhood Area.

5.4.3 At time of writing, WCC is currently working on a complete review of its City Plan. Informal consultation was undertaken on the first draft of Westminster's City Plan 2019-2040 in November and December 2018. Following consultation, any representations received will be considered and the draft plan will be revised in advance of formal consultation under regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012. Given the very early stage of the consultation process and having regard to the tests set out in para. 48 of the NPPF, the policies of the emerging draft City Plan are given little to no weight at the present time.

5.4.4 The relevant policies from the City Plan and Saved from the UDP are as follows:

##### *UDP*

- DES1 Principles of urban design and conservation
- DES9 Conservation areas
- DES10 Listed buildings
- ENV5 Air pollution
- ENV6 Noise
- ENV7 Controlling noise from plant, machinery and internal activity
- ENV12 Waste and recycling storage
- ENV13 Protecting amenities, daylight, sunlight and environmental quality
- ENV17 Nature conservation and biodiversity
- H3 To Encourage the provision of more housing
- H4 Provision of affordable housing
- STRA 25 Parking control
- TRANS 23

*City Plan*

- S14 Optimising Housing Delivery
- S15 Meeting Housing Needs
- S16 Affordable Housing
- S25 Heritage
- S28 Design
- S31 Air Quality
- S32 Noise
- S33 Delivering Infrastructure And Planning Obligations
- S38 Biodiversity And Green Infrastructure
- S40 Renewable Energy
- S41 Pedestrian Movement And Sustainable Transport
- S42 Servicing And Deliveries
- S44 Sustainable Waste Management
- CM28.1 Basement Development

5.4.5 The Knightsbridge Neighbourhood Plan includes policies on a range of matters including area character, heritage, community uses, retail, offices, housing, cultural uses, transport and the environment. The relevant policies from the Knightsbridge Neighbourhood Plan are as follows:

- KBR1: Character, design and materials
- KBR4: Public realm and heritage features
- KBR9: Roofscapes and balconies
- KBR10: Urban greening
- KBR21: Household and commercial waste consolidation
- KBR22: Construction activity
- KBR30: Motor vehicle use
- KBR33: Utilities and communications infrastructure
- KBR34: Healthy air
- KBR35: Renewable energy
- KBR37: Natural environment
- KBR38: Trees
- KBR39: Sustainable water
- KBR40: Healthy people

5.4.6 As a relatively new document, the applicant and design team have had the benefit of dialogue with the Knightsbridge Neighbourhood Forum in an attempt to understand its principal objectives, the local challenges to policy compliance and the wealth of background intelligence embedded in its evidence base. The design team have used this dialogue to refine and finalise the proposals submitted as part of this planning application. The applicant remains committed to continuing the dialogue post submission in the spirit of further refinement and enhancement aligned with the objectives of the plan policies.

5.4.7 In addition to local planning policies, supplementary planning guidance is relevant in the form of the following:

- Design Matters in Westminster SPG (2001)
- Designing Out Crime in Westminster SPG (1997)
- Basement development in Westminster SPD (2014)

## **5.5 Key Planning Issues**

5.5.1 Early engagement is encouraged in the NPPF (para 39) including consideration of formal Planning Performance Agreements (para 46), and the applicant has entered into such an arrangement with WCC covering pre-application and post submission periods in the spirit of positive and creative dialogue (para 38). This has informed the interpretation of relevant policies and the identification of key planning issues that the proposals should be addressing.

5.5.2 Extensive pre-application discussion with the Knightsbridge Association, Knightsbridge Neighbourhood Forum, local residents, businesses, workers, visitors and other interested parties and elected representatives dating back to late 2016 has also informed the design team's approach. These discussions were described in section 4.4 and in the Statement of Community Involvement submitted with the planning application.

5.5.3 The applicant and design team have drawn inspiration from the adopted Neighbourhood Plan and its overall objectives and the aim has been to produce a sustainable, high quality residential development that can serve as an exemplar for future schemes in the plan area.

5.5.4 The key planning policy issues have been identified as follows:

- Land use
- Design & heritage
- Residential amenity
- Transport, highways and parking
- Sustainability

These and other material considerations, including construction impacts, Community Infrastructure Levy and planning obligations are discussed in the sections of the document that follow.

## 6 ASSESSMENT OF THE PROPOSAL

### 6.1 Introduction

6.1.1 As outlined in Section 2, the application seeks planning permission for the following development:

*Redevelopment of Nos. 3-11 Lancelot Place to provide five single family dwellinghouses (Class C3) comprising two basement levels plus sub-basement plant room, (as implemented under planning permission reference 15/10163/FULL), ground, first, second and third floor levels*

6.1.2 This section of the Planning Statement assesses the proposal against the policies of the Development Plan and other material considerations as described in Section 5. The main issues to be addressed in respect of this application are:

- Land use (including affordable housing contribution) (6.2)
- Design & Heritage (including scale, height and massing, landscaping, townscape and views) (6.3)
- Residential amenity (including daylight and sunlight, privacy, air quality and noise) (6.4)
- Transport, highways and parking (6.5)
- Sustainability (including energy strategy) (6.6)
- Construction impacts (6.7)

### 6.2 Land Use

6.2.1 Policy S14 of the City Plan states that the council will work to achieve and exceed its Borough housing target set out in the London Plan and that all residential uses, floorspace and land will be protected. Residential use is the priority across Westminster, except where specifically stated. The policy seeks for the number of residential units on development sites to be optimised.

6.2.2 Unitary Development Plan policy H5 seeks to ensure that an appropriate mix of unit sizes is achieved in all housing developments. It seeks 33% of new units to be family sized, or rather to achieve 3 bedrooms. The more recently adopted Policy S14 stipulates that there is a demand for three bedroom units and the majority of housing stock across the Borough is one and two bed units.

6.2.3 Policy S15 is not prescriptive in terms of the mix, instead recommending that an 'appropriate' mix of units is created. Pre-application advice confirmed the proposed mix to be acceptable and a deviation away from five family houses to be a departure from policy.

6.2.4 Policy H2 of the draft London Plan also indicates that small sites have an important role in delivering London's housing requirements. The plan sets targets for each London Borough for the amount of housing they should provide

annually from small sites. The City of Westminster is required to provide 529 homes from small sites per year. The policy describes that the demolition and redevelopment of existing buildings is encouraged when the development site has good transport links (PTAL score of 3-6).

- 6.2.5 Policy D6 of the draft Plan requires that the optimal housing density be sought, especially in locations that boast strong transport links. The proposed development has the capability to provide additional residential accommodation on a brownfield site which is well connected to local transport networks.
- 6.2.6 The NPPF (paras 118 & 122) seeks the optimal use of brownfield land in balance with housing need, viability, local character and infrastructure. Policy 3.4 of the London Plan (2015) provides guidelines for appropriate residential densities dependent on location and access to public transport links. Given the site's excellent transport links (PTAL Score of 6a), it is expected that a residential development should achieve between 140 and 405 u/ha.
- 6.2.7 The site in its pre-existing state provided a density of 125 u/ha which is below policy requirements but reflects the suburban character and layout of the former terrace, at odds with its otherwise urban setting. The proposed scheme has the same density expressed as units per hectare, but has increased and optimised the use of the site in terms of an increase in habitable rooms. At 875hr/ha the proposed scheme density falls within the London Plan density matrix guideline figure of 650–1100 hr/ha. The scheme is therefore considered to be an appropriate response to optimising residential delivery in compliance with policy, whilst respecting the surrounding townscape, land uses and subsequent considerations arising in respect of residential amenity.
- 6.2.8 Policy GG2 of the draft London Plan (2017) encourages development that is well connected and on brownfield sites to be intensified to promote higher density developments in well located areas. The proposed redevelopment would better utilise the current site and include a net uplift in habitable rooms that is very well situated in relation to local transport networks.
- 6.2.9 The proposed development in land use terms is therefore compliant with adopted and emerging policy positions as set out in the development plan and the draft London Plan (2017). The proposed development is considered to be in accordance with Policy S14 on the basis that the quantum of residential units is maintained, 100% of the units are family sized dwellinghouses and development of a currently underutilised residential site is optimised.
- 6.2.10 The townhouses meet and exceed the minimum residential space standards for new development as set out in the Technical Housing Standards - Nationally Described Space Standard (2015). Emerging policy in the first draft City Plan (2019) seeks to place an upper limit on the floorspace of new homes (150 sqm GIA), but the plan is at such an early stage of consultation that this will carry no weight in the assessment of this proposal.



- 6.2.11 It should be made clear that the current extant consented properties all exceed this proposed new policy maximum benchmark, the largest being just over 300sqm GIA. The now demolished terraced houses were all approaching the proposed benchmark size, the smallest at 142 sqm GIA. Advice received during pre-application discussion with Council officers on the interpretation of H5 of the UDP was clear that family dwellinghouses were the appropriate typology for this site. Following this advice precludes the provision of, say, apartments with floorspace within the proposed new benchmark.
- 6.2.12 Each proposed unit benefits from usable amenity space in the form of a rear patio and light well. A terrace at second floor level and a railing enclosed buffer zone is provided at the front of each property, giving scope for greening. In accordance with policies KBR9 and KBR10 of the KNP, these spaces have been designed from the outset to be an integral part of the design composition. Opportunities for greening are built in and the above ground mansard terrace is stepped back from the façade and will not be accessible to residents in order to protect the private garden areas of surrounding properties. In terms of amenity space and greening space available to future occupiers, the proposals provide an enhancement compared with the pre-existing condition. Each property is proposed to have at least 19 sqm of such space, and much more for No. 11.

***Affordable Housing***

- 6.2.13 The NPPF and National Planning Practice Guidance (NPPG) on planning obligations (July 2018) state that contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area). The NPPG goes on to point out that planning obligations must be fully justified and evidenced. Where affordable housing contributions are being sought, planning obligations should not prevent development from going forward.
- 6.2.14 Policy S16 of the City Plan relates to affordable housing. It requires that proposals of 10 or more new residential units, or over 1,000m<sup>2</sup> (GEA) of additional residential floorspace will be expected to provide a proportion of the floorspace as affordable housing. The proposals will result in 5 replacement units with a total Gross External floor area (GEA) of 2,139 sqm; an uplift of residential floorspace (compared with the pre-existing condition) of around 1,325 sqm (GEA). This results in a total internal floor area (including all non-habitable internal space such as rooms for building plant machinery) of 1,757 sqm (GIA); an uplift of residential floorspace (compared with the pre-existing condition) of around 1,039sqm (GIA).
- 6.2.15 The expectation of the London Plan, the UDP and the City Plan is that affordable housing should be provided on site. Policy S16 states "Where the Council considers that this is not practical or viable, the affordable housing should be provided off-site in the vicinity. Off-site provision beyond the vicinity of the development will only be acceptable where the Council considers that the

affordable housing provision is greater and of a higher quality than would be possible on or off site in the vicinity, and where it would not add to an existing localised concentration of social housing..."

- 6.2.16 Applying the WCC Interim Guidance, a scheme of this size is expected to provide 160 sqm of its floorspace as affordable housing (or the equivalent of two 80 sqm units). However, the advice received during pre-application discussion with Council officers on the interpretation of H5 of the UDP was clear that family dwellinghouses were the appropriate typology for this site, precluding the incorporation of smaller affordable apartments by way of an on-site provision. In any event, the applicant will put forward a case stating that the provision of on-site affordable housing would render the scheme unviable so that it would not proceed. The applicant confirms that they do not have a suitable property located elsewhere in the vicinity of the development that could be utilised for provision of off-site affordable housing.
- 6.2.17 A financial viability assessment will be submitted in support of this application. WCC is expected to appoint independent consultants to review this assessment. The applicant's potential contribution towards planning obligations, including affordable housing, will be the subject of negotiation in light of this independent review of viability. Any contribution would be expected to be secured by condition or legal agreement.

### **6.3 Design & Heritage**

- 6.3.1 The application is accompanied by a Design and Access Statement (incorporating a townscape and heritage assessment as an appendix) where the proposed design approach is described and the heritage aspects raised by the proposals are considered in detail. This Planning Statement does not seek to repeat this assessment, but set out below is a discussion of the key design and heritage issues that need to be considered in determining the application and how they relate to the relevant planning policies.

#### ***Design***

- 6.3.2 Policy DES1 of the saved UDP policies states that development should be of the highest standards of sustainable and inclusive urban design and architectural quality, and should improve the quality of adjacent spaces around or between buildings, showing careful attention to definition, scale, use and surface treatment. Policy KBR1 of the KNP seeks that development protects and enhances Knightsbridge's distinctive character through exemplary standards of sustainable design and use of appropriate high quality materials. Policy KBR 4 and KBR 9 seeks to ensure that heritage features within the public realm are protected and enhanced and the roofscape and detailed design of balconies within proposals are carefully considered and detailed.
- 6.3.3 Policy 3.5 of the London Plan states that the design of all new housing developments should enhance the quality of local places. The design of all new

dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives.

6.3.4 Policy 7.4 of the London Plan states that buildings, streets and open spaces should provide a high quality design response that:

- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- e) is informed by the surrounding historic environment.

6.3.5 Policy 7.6 of the London Plan states that buildings and structures should:

- a) be of the highest architectural quality
- b) be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c) comprise details and materials that complement, not necessarily replicate, the local architectural character
- d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

6.3.6 Issues around residential amenity are dealt with in section 6.4 and climate change adaptation is dealt with in section 6.6. Heritage issues are addressed in more detail below.

6.3.7 The character and appearance of the proposals are based on a thorough understanding of the site and its surroundings and the Design & Access Statement that accompanies this planning application sets out how the development has drawn inspiration from the findings of a detailed urban design analysis of the Knightsbridge area. The proposals allow the positive attributes of the existing place to influence the character of the proposals.

6.3.8 The proposals comprise a locally appropriate pattern and grain of development in the form of a terrace of properties orientated to face Lancelot Place and wrapping around the corner with Trevor Square, finished in a subtly articulated flank reminiscent of corner treatments found throughout the residential streets of Knightsbridge. They are a contemporary take on the historic terraced

townhouses found throughout the Knightsbridge Conservation Area, but specifically those found in Trevor Square immediately adjacent to the site to the west. The high quality materials proposed to be used are commonly found within the area. These are described in more detail below.

- 6.3.9 The scale, height and massing of the proposed development has been carefully considered, respecting the existing context whilst responding to the emerging context and character in Lancelot Place. The height of the proposed houses does not exceed any of its immediate neighbours, existing or under construction. The height in comparison to historic properties in Trevor Square is markedly lower.
- 6.3.10 The proposed buildings are set lower by having a ground floor that steps down from street level in Lancelot Place and upper levels sculpted to step back away from the rear of Trevor Square properties to maintain a comfortable degree of enclosure comparable with the pre-existing relationship and stepped back with a mansard top level fronting Lancelot Place to maintain its a human scale. The overall height of the proposals is consequently only 1.5 metres higher than the extant consented scheme. The sense of enclosure within Lancelot Place is also comparable with historic streets throughout the Conservation Area at an approximate ratio (building height:street width) of 1:1.
- 6.3.11 Principal windows and building entrances fronting Lancelot Place are behind an appropriately designed buffer zone, mimicking a front 'area' found in historic townhouses in Knightsbridge. Space for greening and a lightwell is incorporated. This arrangement provides an attractive and enhanced edge to the public realm whilst maintaining a visual connection that strikes a balance between passive surveillance and security and a sense of arrival and 'home as retreat' for the new occupants.
- 6.3.12 No works beyond the boundary of the site and within the public realm are proposed directly. Nevertheless, the setting of the application site contains some negative townscape aspects outside the control of the applicant that the proposals have attempted to address. The local allocation of Community Infrastructure Levy contribution from the development for environmental improvements, in particular at the junction of Lancelot Place and Trevor Square would be strongly supported by the applicant.
- 6.3.13 At between 340–380 sqm (GIA), including all habitable and non-habitable space such as plant rooms, the homes comfortably exceed the Mayor's relevant space standards for residential units of this size. This will enable them to provide prime residential accommodation appropriate for the location and generously sized rooms in convenient and efficient room layouts which are functional and fit for purpose, with enough scope to meet the changing needs of their occupants over their lifetimes.

6.3.14 Consequently, the proposals comply with relevant local and national policies and guidance, in particular DES1 of the UDP, KBR1, 4, 9 and 10 of the KNP, Policies 3.5, 7.4 and 7.6 of the London Plan and paragraphs 124 and 128 of the NPPF (2018). In accordance with para 130 of the NPPF, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.

**Heritage**

6.3.15 There are no designated listed buildings on the site and it is not within a conservation area, but within the vicinity of the site is a mixed historic and contemporary townscape with some heritage buildings in close proximity.

6.3.16 The western boundary of the site is formed by the eastern edge of the Knightsbridge Conservation Area and the buildings immediately to the west are Grade II listed (1-16 Trevor Square, numbered consecutively). These comprise a terrace of attractive early 19<sup>th</sup> Century houses, with predominantly four above ground floors an 'area' enclosed by railings at the front, steps up to a front door and a basement level. On the Trevor Square façade these are finished in a yellow brick with channelled stucco to ground floor with first floor balconies. Many have been altered and extended at roof level and at the rear. Nevertheless, by virtue of their listing and location within a conservation area, the row of townhouses 1-16 Trevor Square are nationally significant heritage assets.

6.3.17 In respect of listed buildings, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on WCC to "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." Similarly, for conservation areas, Section 72 of the Act requires WCC to pay special attention to "the desirability of preserving or enhancing the character or appearance of that area."

6.3.18 The concept of the setting of either a listed building or a conservation area is not enshrined in planning legislation and does not attract the weight of statutory protection. The circumstances of development located outside of a conservation area but within its setting is not explicitly dealt with by the NPPF, and the NPPF does not introduce any separate test. The NPPF does introduce the concept of 'substantial harm' to heritage significance (para 195) and that local authorities should refuse proposals that result in it.

6.3.19 The national Planning Practice Guidance advises that substantial harm to heritage significance is a high test, so that it may not arise in many cases; those cases would be likely to involve physical harm to the heritage asset itself. The proposals do not involve works to any of the buildings or structures either on the adjacent listed buildings or within their curtilage.

- 6.3.20 The NPPF advises that the setting of a heritage asset can contribute to its significance. Opportunities should be sought for new development within conservation areas and within the setting of heritage assets that would enhance or better reveal the significance of the heritage asset. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 6.3.21 Policy 7.8 of the London Plan (Heritage Assets and Archaeology) states that: “development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail”.
- 6.3.22 Policy S28 of the City Plan requires development to incorporate exemplary standards of sustainable and inclusive urban design and architecture, encouraging imaginative modern architecture provided that it respects Westminster’s heritage and local distinctiveness and enriches its world-class city environment.
- 6.3.23 The setting of a listed building or conservation area is not a concept that lends itself to an exact definition, applicable in every case. The individual circumstances of the proposals, their design and location, will have a strong bearing on whether or not any harm to setting can be identified or whether they can enhance or better reveal heritage significance.
- 6.3.24 Guidance on the concept of setting and the application of policy tests in relation to development proposals is contained in The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, Historic England Nov 2017). It advises a five step process:
- Step 1:** Identify which heritage assets and their settings are affected  
**Step 2:** Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated  
**Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it  
**Step 4:** Explore ways to maximise enhancement and avoid or minimise harm  
**Step 5:** Make and document the decision and monitor outcomes
- 6.3.25 The townscape and heritage assessment included in the Design & Access Statement accompanying this application has used this stepped process to inform its findings.
- 6.3.26 In summary, the setting of the site and its surroundings is defined, in part, by visual means, but also historic association; cultural, social and economic. The design team has considered this in its broadest terms and drawn inspiration from the site context to inform the adopted design approach.

- 6.3.27 The site has historically been used for purposes other than residential, being occupied by a chapel, subsequently used for the sale and storage of furniture in connection with the Harrods store. Its development for a terrace of houses in the 1950s represented a departure for the street, which around that time still had a commercial/industrial character, now effectively gone.
- 6.3.28 The street remains on its former alignment, but with its focus now on serving the substantial scale late 20th and early 2000s redeveloped area around Knightsbridge Green. It represents a marked transition between this and the conservation area to the west. As a gateway to the conservation area, it is perfunctory, with some unsightly aspects, particularly around the rear of Brompton Road where service access to buildings dominate.
- 6.3.29 A key aspect of historic association, for the site and the street, is therefore variety and change and the potential unifying role contemporary development can make in an area with an emerging character.
- 6.3.30 The immediate setting for the conservation area on its eastern edge closest to the application site is limited if defined in visual terms. The edge is marked by the backs of properties in Trevor Square. The backs and roof profile have not previously been assessed as contributing to their heritage significance, as evidenced by the existing buildings' proliferation of alterations at rear ground, first floor and roof levels. Their completeness and architectural homogeneity within the setting of the square itself is the basis of their listing as a group and inclusion in the conservation area (prior to subsequent alterations), along with a sense of intimacy and enclosure provided by the mature vegetation in the centre of the space.
- 6.3.31 The southern end of the application site is partially visible from the southern end of the square, but is not a dominant foreground element. The intervisibility between the application site and the conservation area is, therefore, largely limited to the back to back relationship with 1 – 16 Trevor Square. The application site cannot be seen from within the heart of the square or the remaining streets within the conservation area to the west and its presence is therefore not perceived within the area of most historic significance in the vicinity of the site.
- 6.3.32 The application site proposals have been designed from the viewpoint of opportunity for enhancement as a key townscape element outside but on the approach to the conservation area and as a partially visible but subservient element of a view out of it. The removal of the pre-existing terrace is regarded as an improvement in itself, being a series of buildings that failed to protect or enhance the character of its setting.
- 6.3.33 The scale of the proposed replacement houses has been kept subservient to the scale of 1-16 Trevor Square and the backs are proposed to be finished to mirror those of the listed buildings; finished in a sympathetic combination of

yellow brick and metalised roofing material befitting the appearance of a sequence of mansard roofs separated by fire breaks. They respond to the listed terrace in terms of urban grain and format, mimicking the basement, three full floors and mansard arrangement of an historic terraced townhouse of the late 18th or early 19<sup>th</sup> Century period.

- 6.3.34 The proposed flank of the southern end of the terrace ties in with the flank of 16 Trevor Square, adopting its palette of materials and lining through with channelled stucco and brick. In common with corner treatments found throughout the conservation area, a different parapet treatment is proposed above 3<sup>rd</sup> floor level as a further nod to the architectural inspiration of the late 18th or early 19<sup>th</sup> Century townhouse setting. It presents an enlivened frontage compared with the pre-existing terrace and enhances its street setting and the approach to the conservation area.
- 6.3.35 The proposals, therefore, remove an unsympathetic and visually jarring townscape element represented by the pre-existing terraced dwellings and propose a replacement terrace of a more sympathetic design, compatible with the appearance of the historic setting and using high quality complementary external materials that have precedence within the site setting. In terms of overall scale, the proposals complete the composition of the street block with buildings no higher than their immediate neighbours. No direct harm to the heritage assets will result. The proposals represent a character and appearance that is respectful of setting and enhances townscape. Consequently, they meet the test of 'less than substantial harm' as set out in the NPPF (para 195) and NPPG and comply with relevant local policies and guidance, in particular DES1, DES 5, DES 9 of the UDP and KBR1 and KBR9 of the KNP.
- 6.3.36 Other technical aspects of design relating to energy, air quality and noise are addressed separately below.

## **6.4 Residential Amenity**

6.4.1 Development impact upon existing residential amenity is multi-faceted, and in relation to these proposals is in large part concerned with the location and design of the proposed buildings, their spatial relationship with adjoining buildings, the content and performance of building plant within them and the temporary impacts of construction activity. Being a small scale car free development not involving a tall building, impacts will be localised and significant impacts around traffic, microclimate and overshadowing across a wider area will not arise. The areas addressed here, therefore, focus on the following:

- Daylight and sunlight
- Privacy
- Air quality and noise
- Construction impacts (including basement development)



6.4.2 Supporting technical information submitted with the planning application includes a Daylight and Sunlight study, an Energy and Sustainability Statement, an Acoustic Assessment and an Arboricultural Assessment. Temporary impacts concerning the current construction of the consented scheme are addressed in previously approved documentation and these are resubmitted for information purposes. The findings of all these documents are summarised here as they relate to relevant planning policies.

***Policy Overview***

6.4.3 Policy ENV13 of the UDP states that the Council will resist proposals that would result in a material loss of daylight/sunlight, particularly to dwellings, and that developments should not result in a significant increased sense of enclosure, overlooking or cause unacceptable overshadowing. Similarly, Policy S29 of the City Plan aims to protect the amenity of residents from the effects of development. Paragraph 123 (c) states that “when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

6.4.4 Housing Supplementary Planning Guidance (London Plan, March 2016) will also be relevant. This offers guidance on the interpretation of policy and the application of the relevant Building Research Establishment (BRE) standards in relation to daylight and sunlight. In summary, this calls for an appropriate degree of flexibility in the application of the BRE Handbook to the particular circumstances of London. It states:

- that the BRE Handbook is applied sensitively to high density development, especially in areas such as town centres, where alternative targets (from the normal standards) may be more appropriate;
- that the application of the BRE Handbook needs to be consistent with optimizing housing capacity and growth generally in recognition of the need for change in an area;
- that comparisons should be made with the daylight and sunlight values achieved in comparable areas and typologies across London (rather than strictly with the national numerical values); and
- that to fully optimise housing potential on large sites may necessitate a departure from the current “standards”.

6.4.5 Policy KBR 40 of the KNP encourages development to mitigate any adverse impact on the local noise environment, informed by a noise assessment as appropriate. Policy ENV7 of the UDP seeks to control noise generated by building plant. Policy KBR 34 seeks development that aims to be at least ‘air quality neutral’ and not cause or contribute to worsening air quality. Policies S31 and S32 of the City Plan seek to minimise emissions of air pollution and

noise pollution from static sources including impacts on existing residents and future occupants of buildings. Policies 7.14 and 7.15 of the London Plan seek to improve air quality and reduce and manage noise arising from development, improving and enhancing the acoustic environment.

- 6.4.6 Policy KBR22 of the KNP seeks to protect the residential amenity of existing residents from impacts arising from construction activity through dust and emissions, light pollution, noise and vibration during deconstruction and construction. Policy CM28.1 of the City Plan and SPD produced by WCC sets out the residential amenity issues that development which includes basements needs to address.

***Daylight and Sunlight***

- 6.4.7 The submitted Daylight and Sunlight information is based on a detailed three dimensional computer model of the proposals and their built and emerging context (established by survey). This identifies the impact of the proposals in terms of daylight and sunlight upon buildings in the vicinity of the site. The pre-existing, extant consented scheme currently under construction and the current proposed amended design have been assessed.

- 6.4.8 Every window in every adjacent and affected building is identified and the impacts analysed and assessed in reference to the guidance contained in the Building Research Establishment (BRE) Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice (2011). Three methodologies for daylight assessment are provided:

- The vertical sky component (VSC)
- The no sky line (NSL)
- The average daylight factor (ADF)

A single methodology for sunlight assessment is provided:

- Annual probable sunlight hours (APSH)

The ADF is not generally recommended by the BRE for assessing daylight to existing surrounding properties and as such has not been considered by the submitted study.

- 6.4.9 In its introduction, the BRE guidance emphasises that it is intended to be applied sensibly and flexibly and in the spirit of promoting development rather than constraining it. Where relevant, local planning authorities commonly refer to the BRE guidance when considering planning applications but will need to do this in balance with the swathe of other planning policy considerations, including the tests contained within the NPPF concerning the presumption in favour of sustainable development (para 11) the optimal use of land for new homes (para 123) and the Mayor’s advice on the application of the BRE Handbook. Full compliance with the guidance in proposed layouts tends to result in a low rise suburban character so this flexible application of the

guidance is more likely to be required in denser urban settings such as that of the application site.

- 6.4.10 The findings of the study have identified, comparing the extant consented scheme's impacts with the current proposals' projected impacts, that the majority of pertinent window apertures in adjacent measured properties experience no greater than a 1.3% absolute change in VSC. One exception exists, identified in the report as W1/F02 on the currently under construction 15 Lancelot Place, but the relevant window will retain a VSC value of 25.1%.
- 6.4.11 No room within the surrounding properties will experience greater than an absolute change in NSL beyond 1.4sqm compared with the consented scheme. Such marginal differences in daylight (VSC and VSL) are unlikely to be perceptible.
- 6.4.12 In terms of sunlight (against the ASPH criterion), 148 of 179 rooms (82.7%) in adjacent properties experience no change in annual or winter sunlight conditions beyond the extant consented scheme.
- 6.4.13 It is not considered that the proposed scheme will create any additional material or noticeable change to the levels of daylight and sunlight enjoyed by the surrounding properties and as such the development performs well against the BRE guidance and within the flexibility in its application to a denser urban context such as this.
- 6.4.14 A corresponding study of daylight and sunlight within the application site and for the proposed amended building design concludes that all proposed habitable rooms will have access to good daylight and sunlight and all main living areas will enjoy excellent levels of sunlight. Where levels of daylight and sunlight lower than the BRE guidance is experienced, these are either a result of measures to mitigate for the privacy of adjoining existing residents through design and orientation of proposed windows or at ground and basement level and due to the presence of taller existing buildings in the vicinity of the site.
- 6.4.15 The proposals are considered to be in line with paragraph 123 (c) of the NPPF and policies S29 of the City Plan and ENV13 of the UDP saved policies.

**Privacy**

- 6.4.16 Successful management of overlooking of private gardens and building intervisibility (window to window) in a close knit urban residential area, protecting existing resident's reasonable expectation of privacy, is the aim of policy as contained in the development plan. Part (F) of Policy ENV13 seeks to resist development which would result in a significant increase in overlooking. The proposals have been designed to mitigate against a material and detrimental alteration to the pre-existing relationship.

- 6.4.17 In the pre-existing situation, a row of five terraced houses over three levels occupied the site with back to back distances between Lancelot Place and Trevor Square (main rear façade to main rear façade) of between 8 and 13.5 metres. The separation between fronts of buildings in Lancelot Place was around 12 metres and this is not proposed to change. Most properties in the street block containing the application site, including those houses on the site now demolished, have been extended at the rear, and at roof level resulting in narrower back to back distances at ground level and introducing further window apertures on upper levels.
- 6.4.18 Development of the site presents an opportunity to alter this back to back relationship in balance with the need to provide adequate amenity, daylight and sunlight for future residents of the proposed new homes. The layout and architectural treatment of the western elevation of the proposed development has been designed to directly address this by stepping back the proposed building at ground level from the western boundary compared with the footprint of the demolished buildings and also introducing a graduated stepping back on upper levels to increase back to back distances. The existing 3 metre high wall on the western boundary is retained and ground level interlooking between proposed and existing properties is not possible. In addition, all proposed windows above ground level have been designed to either offer an oblique outlook to the rear (on first and second floor) or windows with openings above eye level within the mansard level, thereby avoiding direct window to window interlooking with Trevor Square properties entirely.
- 6.4.19 The expectation for privacy in dwellings facing a public street is very different. Within the proposals, a buffer zone at the front of each dwelling provides a degree of separation from the street and residents will be expected to employ blinds or curtains to regulate their own levels of privacy as existing residents do currently.
- 6.4.20 The proposals as far as they relate to addressing privacy are considered to meet the requirements of Policies S29 of the City Plan and ENV 13 (F) of the UDP.

***Air Quality and Noise***

- 6.4.21 As a car free residential development on a previously residential site, the potential changes to air quality and the noise environment are limited to those arising from energy generation, heating and cooling mechanical and electrical plant within the site.
- 6.4.22 The Energy and Sustainability Statement submitted with the application has considered air quality and noise as part of its assessment of the environmental performance of the building. The findings of the statement are described in more detail in section 6.6.

- 6.4.23 There will be no emissions arising from the strategy for energy supply, heating, hot water and ventilation of the building. An electrically driven, ground source heat pump will provide the heat source for heating and domestic hot water for each dwelling. A photo voltaic array is proposed on the horizontal element of the roof of each dwelling.
- 6.4.24 In terms of internal air quality, Mechanical Supply and Extract Ventilation with Heat Recovery (MVHR) is proposed with a heat reclaim from the extract to the supply duct. Two such units will be provided. This proven low-energy and highly efficient ventilation method, extracts moisture-laden stale air from 'wet' areas, such as kitchens and bathrooms. The heat from this stale air is recovered via a heat exchanger, and this tempered air delivered into the living areas of the home. Each dwelling shall utilise this technology with terminations to atmosphere occurring through the external walls at high level or roof level. Fresh air inlets will have high efficiency filters fitted to minimise particulates being brought into the dwelling. Each unit will operate summer bypass to help mitigate the risk of overheating.
- 6.4.25 Ventilation, heating and hot water control systems will be located within a services channel underneath basement level 2 (accessible through a hatch in each dwelling). One MVHR unit is located at basement level vented via a lightwell to the rear of each dwelling and the other MVHR unit is within the top floor of each dwelling, vented via the roof. These are the only noise generating plant apparatus in the new homes audible beyond the boundary of the site. An assessment of their acoustic performance has been undertaken in parallel with the energy strategy and this finds that, being contained within the envelope of the building and expelled via acoustically treated ductwork (silencers), the proposed building plant will meet the policy requirement contained in ENV7 by not exceeding 10db below the minimum external background noise level at the nearest sensitive properties. The acoustic assessment measured the minimum background noise level (LA90 15 mins) at 49.2 db and the highest predicted noise level of the MVHR units (at the nearest neighbouring window at basement level) as 37.6 db(A).
- 6.4.26 It is considered that, in terms of air quality, the proposals are at least air quality neutral and meet the requirements of Policy KBR 34 of the KNP, Policy S31 of the City Plan and Policy 7.14 of the London Plan.
- 6.4.27 In terms of noise, the application is accompanied by an acoustic assessment that demonstrates how the electrically driven building plant is very low impact and can comfortably meet the relevant requirements of Policy ENV7 of the UDP, Policy KBR 40 of the KNP, Policy S32 of the City Plan and Policy 7.15 of the London Plan.

## 6.5 Transport, highways and parking

- 6.5.1 The application is accompanied by a Transport Statement prepared by Transport Planning Practice. It finds that the site benefits from excellent accessibility. The site is within an area with a Public Transport Accessibility Level rating of 6a (excellent), with 11 bus services within a 3-4 minute walk from Lancelot Place in Brompton Road and Knightsbridge, Knightsbridge London Underground station 330m to the south west of the site and a cycle hire docking station lies 300m to the west of the site.
- 6.5.2 The site is located on a one way street serving as a looped access road with Raphael Street accessed from Brompton Road and connecting back to it at Knightsbridge Green. The street is lined with marked parking bays and is within a controlled parking Zone (CPZ area A (A3)). Zipcar car club bays are within easy reach in Trevor Place and Hans Road, both not more than 3-4 minutes walk from the site.
- 6.5.3 Policy 6.13 of the London Plan promotes car free development in locations with high public transport accessibility. This is supported by Policy KBR 31 of the KNP. Policy T6 of the draft New London Plan states that car free development should be the starting point for all development proposals in such locations. Policy S41 of the City Plan prioritises reducing reliance on private motor vehicles and single person motor vehicle trips.
- 6.5.4 Guidance received during pre-application dialogue with WCC confirmed that car free development in this location would be acceptable. The development does not propose to include parking on site. There is on-street parking in Lancelot Place available and this arrangement will not alter following development. In terms of usage of motor vehicles, the proposals have a neutral impact compared with the pre-existing situation and comply with the spirit and detail of the above policies.
- 6.5.5 Policy KBR29 states that proposals that are likely to generate significant transport movements should demonstrate no significant adverse impacts on: a. air quality b. road safety c. the pedestrian environment and movement d. cycling infrastructure; e. disabled access; and f. the street network. NPPF para 32 states that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."
- 6.5.6 Compared with the pre-existing situation where five townhouses occupied the site, the proposed replacement townhouses will not generate significant additional transport movements or severe impacts.
- 6.5.7 An analysis of WCC's own parking beat survey of streets in the area has established car parking bay capacity in the surrounding streets. Survey results included the site when fully occupied (2015). No additional demand for parking is anticipated to arise as a result of the proposals.

- 6.5.8 Policy TRANS 23 of the UDP states that where the on street parking threshold in an area is over 80% then this will result in an unacceptable level of deficiency and increase parking stress in the area. The day time parking occupancy of residential parking bays within a 200m radius of the site fluctuates between 73 and 75%. The night time parking occupancy of residential parking bays within a 200m radius of the site is 78%.
- 6.5.9 Parking pressure in this area is below the stress level even accounting for the use of the site for five houses and therefore the development is consistent with the aims of the City Council's policy TRANS 23 (B) and (D).
- 6.5.10 Cycle storage is included in each house, at basement level 1, accessible via stair and lift. Two spaces are provided per dwelling. This meets the requirements of the draft London Plan standards in this regard and complies with policy 6.9 of the London Plan and policy S41 of the City Plan.
- 6.5.11 Policy ENV12 (Waste and recycling storage) of the UDP, Policy KBR21 of the KNP (Household and commercial waste consolidation) and Policy S44 of the City Plan (Sustainable Waste Management), require developments to make appropriate arrangements for waste management, space available within them for the needs of occupiers and secure a viable means of collection. S42 of the City Plan (Servicing And Deliveries) seeks to manage the wider impacts of deliveries to and from sites and offset the cost and impacts of any change in arrangements.
- 6.5.12 The development will not generate additional or different requirements for waste collection, servicing or deliveries than the pre-existing 5 houses that occupied the site. The existing arrangement of access from the street is proposed to continue. Within each house, an area at basement level 1 is allocated for waste and recyclable material storage, accessible via stair and lift. Storage containers will be brought to street level on the day of collection as per the previous arrangement.
- 6.5.13 The proposed development is accessible to a number of local facilities and transport connections. Lancelot Place is a local route serving a number of developments fronting Brompton Road and Knightsbridge. Given that the development would result in no net additional units, the proposals are not considered to detrimentally impact on the operation of the local road network, pedestrian or highway safety during operation or result in a material increase in trips that result in a material impact upon amenity. Appropriate arrangements have been made within the design to allow storage of cycles, waste and recyclable material and facilitate safe and efficient servicing of the development once completed. Traffic management arrangements are in place for the construction of the extant scheme and it is envisaged that these will be extended to cover the modified design should this be approved. Planning conditions would be expected to secure these arrangements. In terms of

transport, highways and parking, the proposed development is considered to have met the requirements of relevant policy.

## 6.6 Sustainability

- 6.6.1 Policies within the Knightsbridge Neighbourhood Plan (KNP) place great emphasis on the sustainable aspects of development and the potential contribution this makes to the improvement of a range of environmental indicators affecting the amenity of the neighbourhood. Policy KBR35 of the KNP (Renewable Energy) states that major development must minimise energy use and maximise the proportion of energy used from renewable sources. Policy KBR9 (Roofscapes & Balconies) seeks the location of plant in proposals within basement levels or concealed within the roof area. Linked issues relating to air quality and noise were dealt with at 6.4.
- 6.6.2 The energy and carbon requirements of The London Plan are detailed in Chapter 5 London's Response to Climate Change. Policy 5.2 Minimising Carbon Dioxide Emissions, coupled with GLA's guidance on preparing energy assessments, requires all new-build residential developments to reduce carbon emissions by 35% against the Part L 2013 Baseline.
- 6.6.3 Policy S39 of the City Plan requires major development to link to and extend existing heat and energy networks where practical and viable or provide site-wide decentralised energy generation. It encourages smaller developments to be enabled to connect into heat and energy networks. Policy S40 requires major development to achieve 20% reduction of CO2 emissions where appropriate and practical.
- 6.6.4 The Greater London Authority Guidance on Preparing Energy Assessments details the Energy Hierarchy which states how the carbon reduction needs to be reported at each stage Be Lean, Be Clean, Be Green. The submitted Energy and Sustainability Statement follows this methodology and its findings are set out below.
- 6.6.5 The regulated CO2 emissions for the entire development could be reduced by **37.85%**:

### **Be Lean** - use less energy

In accordance with this strategy, the development will incorporate a range of energy efficiency measures including levels of insulation exceeding Building Regulations, tight air permeability and the installation of high performance triple glazing. The implementation of these measures are expected to reduce CO2 emissions by **10.44%** when compared to a notional building built to current Part L Building Regulations (2013).

### **Be Clean** - supply energy efficiently

This stage of the hierarchy cannot be applied to this development.

### **Be Green** - use renewable energy



A feasibility study was carried out to determine the most appropriate renewable technology for this development. Based on the site context, a Ground Source Heat Pump (GSHP) with Photovoltaics (PV) considered most suitable and would further reduce CO2 emissions by **27.41%**.

- 6.6.6 This saving would require the installation of high quality PV panels and a NIBE fighter Ground Source Heat Pump. GSHP and PV were considered to be best suited to this development due to the significant amount of CO2 savings achieved and the consequent benefits in terms of noise and emissions.

## 6.7 Construction Impacts

- 6.7.1 Policy KBR22 of the Knightsbridge Neighbourhood Plan states that proposals should be designed in a way that minimises their impacts on amenity, public health and the environment through dust and emissions, light pollution, noise and vibration during deconstruction and construction.

- 6.7.2 The inclusion of two basement levels within the scheme means the proposals need to be considered in the light of Policy CM28.1 of the City Plan. The existence of an existing permission for a two basement level scheme, part implemented is also a material consideration. The policy states:

*"All applications for basement development will:*

*3. not involve the excavation of more than one storey below the lowest original floor level, unless the following exceptional circumstances have been demonstrated;*

*a) that the proposal relates to a large site with high levels of accessibility such that it can be constructed and used without adverse impact on neighbouring uses or the amenity of neighbouring occupiers; and*

*b) that no heritage assets will be adversely affected."*

'Large site with high levels of accessibility' is not defined, but the policy applies to both extensions and redevelopment and acknowledges that tightly constrained urban sites where basements are proposed underneath existing buildings and directly adjacent to residential properties have been the source of much of the concern about basement development within the City. This is not the case in this situation. No heritage assets will be adversely affected.

- 6.7.3 The co-ordinated construction of the basements of 15 and 3-11 Lancelot Place has long been the aim of the applicant in negotiation with the owners of No 15. The joint piling agreement entered into by adjoining owners is submitted with the application for information. In combination with the adjacent site, a road frontage of nearly 95 metres is accessible from Lancelot Place and Trevor Square occupying half an entire street block. It allows the scope to be serviced during the construction phase entirely from a public street, without preventing access to neighbouring properties and, once a compound has been established, can be built within the confines of the site boundary. It is suggested that this

constitutes a large accessible site under the meaning of the policy and that the exception test in policy CM28.1 applies.

- 6.7.4 The applicant has been required to submit a detailed methodology for construction and management relating to the extant permission basement and a traffic management plan for enabling works to proceed. The technical structural elements and environmental impacts associated with the construction of two levels of basement are thus resolvable to the satisfaction of WCC.
- 6.7.5 During pre-application consultations, comments were made relating to potential disruption resulting from construction works. The applicant has been keen to explore how these impacts can be carefully managed in concert with adjacent works at No 15. Positive comments from local residents confirm that works undertaken so far have been professionally and sensitively handled.
- 6.7.6 In the spirit of considerate contractor best practice principles, the applicant endorses the Neighbourhood Plan's focus on managing construction impacts and is committed to compliance with the Council's Code of Construction Practice (July 2016). The applicant further accepts that planning conditions would be appropriate in order to secure a construction methodology including revised traffic management plan in respect of above ground construction works. The applicant would also be open to a condition that restricted the timing of building work which can be heard at the boundary of the site, as is the case with the extant consented scheme. Subject to conditions, the proposals are considered to be in accordance with KBR22 of the KNP.
- 6.7.7 Policy 7.21 of the London Plan (Trees and Woodlands), Policy CM28.1 of the City Plan and KBR38 of the KNP seek to protect from the loss of trees of public amenity value through development, including basement construction.
- 6.7.8 The proposals have the potential to impact on three trees adjacent to the site and within the rear garden areas of properties in Trevor Square. A maturing sycamore (height 10 metres), maturing ash (height 6 metres) and young eucalyptus (height 8 metres) are closest to the site. The trees are not covered by a Tree Preservation Order.
- 6.7.9 An arboricultural assessment, tree survey and heads of terms method statement for their protection has been prepared on behalf of the applicant. This assesses the health of the trees as all category C (low/unsuitable). Nevertheless, it is the intention of the applicant that all trees will be protected and the submitted assessment demonstrates that all are capable of retention. It should be noted that the committee report for the extant consented scheme acknowledged the possibility of the potential loss of trees and that this would not be objected to by WCC. A full method statement for their retention and protection during construction would be expected to be secured via condition.

- 6.7.10 The proposals are considered to have met the requirements of Policy 7.21 of the London Plan (Trees and Woodlands), Policy CM28.1 of the City Plan and KBR38 of the KNP.

## **7 PLANNING OBLIGATIONS AND CONDITIONS**

- 7.1 Under Policy S16 of the City Plan and Policy H4 of the UDP, the proposed increase in net floorspace in the development compared with the pre-existing situation, requires a contribution towards the provision of affordable housing in the City. A 'cascade' approach to the application of policy is applied as set out in policy and described in interim guidance notes produced by WCC. This requires, in the first instance, that affordable housing is provided on site and sets out the tests for alternative means of provision, with the final option being payment in lieu to WCC's centralised affordable housing fund. The proposed affordable housing provision is discussed in Section 6.2.
- 7.2 The applicant has put forward a case stating that the provision of on-site affordable housing would render the scheme unviable so that it would not proceed. The applicant also confirms that they do not have a suitable property located elsewhere in the vicinity of the development that could be utilised for provision of off site affordable housing. The Council is expected to appoint independent consultants to review this assessment and the eventual contribution towards affordable housing and means of securing it is expected to be arrived at through negotiation.
- 7.3 The applicant also expects to enter into discussion with WCC during the determination period about the content of conditions that meet the NPPF's relevant tests. Para 204 of the NPPF states that planning obligations should only be sought where they meet all of the following tests: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- 7.4 Further to the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, the City Council cannot impose a pre-commencement condition (or a condition which must be discharged before works can start on site) on a planning permission without the written agreement of the applicant (unless the applicant fails to respond within set parameters). It is expected that such conditions would cover further construction activity at the site and the management of related traffic. The applicant would be open to any reasonable proposal for such conditions.
- 7.5 With an uplift in residential floorspace, the proposals would attract a Community Infrastructure Levy payment under the Mayoral scheme and WCC's own adopted scheme. The site is within an area where a £50/sqm Mayoral rate and £550/sqm (prime residential) WCC rate would apply (as index linked to date of approval).

## 8 CONCLUSIONS

- 8.1 This planning application is seeking permission for an alternative design to an approved and part implemented redevelopment. The extant permission (reference 15/10163/FULL) relates to a similar proposal for 5 family dwelling houses, approved in 2016:

*"Demolition and redevelopment of Nos. 3-11 Lancelot Place to provide five single family dwelling houses (Class C3) comprising two basement levels (plus sub basement plant room), ground, first and second floors levels."*

- 8.2 The terrace of five houses previously occupying the site has been demolished and excavation of the approved two basement levels has commenced, in co-ordination with an adjacent approved development, at 15 Lancelot Place, also currently under construction.
- 8.3 The proposals for the site relate to the above ground element of the development where approval for a different design of townhouse is sought on the same footprint as the extant consented scheme. The substantive issues were dealt with previously when the consented scheme was considered, but they remain as follows:

### **Land use**

- 8.4 The proposed use of the site is unaltered and the mix of accommodation remains the same, being 5 family sized dwelling houses. In pre-application dialogue with the Council and in pre-application consultation, there was broad agreement that this typology and use was appropriate and policy compliant, the principle being established by the extant permission. The proposals have sought to optimise use of the land, whilst improving the amenities of residents and environmental performance of the buildings themselves.

### **Design & Heritage**

- 8.5 The proposed terrace of new homes is marginally taller than the extant consented scheme but not as tall as the buildings immediately surrounding the site, including the listed terrace of 19th Century properties backing on to the site to the west. The scale, massing and sense of enclosure remains proportionate to and compatible with the existing street and back to back relationships.
- 8.6 No direct works to heritage assets results from these proposals. The proposals contribute positively to the local townscape, removing an inappropriate and low quality pre-existing terrace of houses and redeveloping the site with a carefully considered contextual and contemporary design that takes inspiration from its historic setting. It is compatible with and enhancing of the heritage significance of the setting.

***Residential Amenity***

- 8.7 Opportunities have been taken within the design of the proposals to mitigate against the pre-existing interlocking between dwellings, employing a combination of angled, high level and obscure glazed windows to prevent obtrusive overlooking between neighbouring properties. Renewable energy is employed using low noise and emission impact technology within a sustainable strategy for heating and ventilating the buildings that achieves policy targets for reducing CO2 emissions.
- 8.8 Daylight and sunlight impacts have been carefully measured following appropriate guidance and show that, compared with the extant consented scheme, changes to levels enjoyed by surrounding properties will be barely perceptible.

***Transport***

- 8.9 This is a highly accessible location. A car-free development is proposed that incorporates integrated cycle, refuse and recycling storage, connected with the street via an internal lift. No material change to the pre-existing situation is anticipated.

***Sustainability***

- 8.10 The regulated CO2 emissions for the entire development are predicted to be reduced by 37.85%. This will be achieved by employing a rooftop PV array for each dwelling, ground source heat pump and mechanical ventilation heat recovery.

***Construction Impacts***

- 8.11 Two levels of basement were consented in the previously approved scheme and the process has commenced for their construction in tandem with the adjacent site at No. 15. The current proposals adopt the same footprint and do not propose to alter the extent of the basement. In combination with the adjacent No. 15 this is a large and accessible site and does not impact adversely any heritage assets. Construction methodology and traffic management arrangements for construction have been approved and are being adhered to.
- 8.12 On balance, therefore, the application proposal accords with relevant national and local policies. Where impacts arise they have been taken into account in the design of the buildings or will be controlled through planning condition.
- 8.13 In terms of the overall tests set out in the NPPF, the proposal is considered sustainable development for which there is a presumption in favour of permission being granted.

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