Planning statement

2 Dovehouse Street, London, SW3 6LA
1. Introduction

1.1. This statement has been prepared on behalf of our client, Auriens Limited, to support a planning application relating to the redevelopment of 2 Dovehouse Street, London, SW3 6LA.

1.2. This planning application proposes the redevelopment of the site to provide an extra care facility (Class C2) comprising 55 units, communal and wellbeing facilities, back of house and service areas, car and cycle parking, landscaping and plant. The proposed building will comprise lower ground floor to fourth floor levels, a part fifth floor level, and a part basement level.

1.3. This planning application follows five pre-application submissions to the Local Planning Authority (LPA) over a period of nine months. Revisions have been made to the pre-application proposals in order to address the advice provided by the LPA. The proposal has also been presented to the Architecture Advisory Panel (AAP) and a three day public consultation event was held prior to the submission of this application offering local residents and amenity groups an opportunity to view and respond to the proposals.

1.4. This statement provides background information on the site at 2 Dovehouse Street, will set out how the proposal has responded to advice previously given by the LPA, and offers a detailed consideration of the proposals in relation to planning policy and other material considerations. This statement has been set out under the following headings:

- Section 2 – Site, surroundings and planning history;
- Section 3 – Proposal;
- Section 4 – Pre-application discussions;
- Section 5 – Relevant planning policy;
- Section 6 – Planning considerations;
- Section 7 – Conclusions;
- Section 8 – Appendix.

1.5. This statement should be read in conjunction with the following documents which are being submitted as a part of the application:

- Application form;
- CIL form;
- Acoustic report prepared by Waterman;
- Air quality assessment prepared by MLM;
- Arboriculture report prepared by Dr Frank Hope;
- Draft construction management plan prepared by Knightbuild;
- Daylight and sunlight report prepared by Point 2 Surveyors;
- Demolition and construction environmental management plan prepared by Knightbuild;
- Demolition and construction traffic management plans prepared by Knightbuild;
- Design and access statement prepared by PDP LDN including location and block plans, existing and proposed drawings;
- Drainage management plan prepared by Watermans;
1.6. This statement concludes that the scheme will bring forward a number of planning benefits. The most notable, will be the provision of fit for purpose, high quality accommodation for elderly people with specific care needs. The scheme will provide the opportunity for 55 households to have independent living units while having the comfort of 24 hour, 7 days a week on-site nursing and personal care and access to a range of communal and wellbeing facilities. This provision will directly respond to the LPA’s current shortfall of accommodation for elderly people who are in need of care and will comply with planning policy which states that extra care schemes will be supported in the south of the Borough.
2. Site, surroundings and planning history

Location

2.1. The application site is located within the Royal Borough of Kensington and Chelsea (RBKC) and in the Stanley ward. It is located on the eastern side of Dovehouse Street, is adjoined by Dovehouse Green to the south and bordered by Britten Street to the north.

Site characteristics

2.2. The application site is an irregular shape with five boundaries. It extends approximately 60m along Dovehouse Street and 36m along Britten Street. The site has an area of approximately 0.3ha.

2.3. The application site currently contains a 3 storey red brick building with plant at roof level, understood to have been constructed in the 1960s. Primary vehicle access to the site and car parking is via Dovehouse Street and there is a secondary vehicle entrance for servicing along the boundary with Dovehouse Green. The main pedestrian access to the site is off Dovehouse Street.
2.4. The existing building was most recently occupied by Thamesbrook, a 56 bed nursing and care facility managed by RBKC. Thamesbrook House operated at the site until it was closed in June 2014.
Surrounding area

2.5. The application site directly adjoins the Chelsea Farmer’s Market to the east which comprises a series of 1 storey buildings. This is the only site which directly adjoins the site. It is noted that there is a planning application currently being assessed by RBKC for the redevelopment of this site (ref no. PP/16/04366). This planning application is discussed in further detail in the following paragraphs.

2.6. The area surrounding the site comprises:

- Mixed use retail and workshop buildings on the corner of Britten and Sydney Streets which extend to 3 storeys in height.
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- Royal Brompton Hospital buildings including the Britten Wing directly to the north of the site which extends to 4 storeys in height.

Image – Britten Wing, Royal Brompton Hospital

- Residential development to the west of the site across Dovehouse Street which extends to 4 storeys in height.

Image – adjacent residential development along Dovehouse Street including Henry Moore Court

- Retail and employment mansion block development to the south east of the site fronting the King’s Road which extends to 5 storeys in height.
2.7. The site sits within the wider context of the institutional uses associated with the Royal Brompton Hospital which are primarily located to the north and north east of the site; and the commercial and retail uses which extend both east and west along King’s Road.

Use and occupier

2.8. Thamesbrook comprised a total of 3,112sqm and 56 bed spaces including 31 beds for nursing care, 20 beds for dementia care and 5 beds for slow stream rehabilitation. Thamesbrook was temporarily closed in 2014 following the detection of intractable Legionella bacteria in the water system. Residents were relocated to alternative residences.

2.9. Prior to the closure of Thamesbrook, substantial problems relating to the building fabric and equipment had been identified and service reviews concluded that the institution did not meet Care Quality Commission (CQC) standards for care homes. It was also identified as having an inefficient layout, insufficient facilities and deteriorating quality. Further problems included the lack of suitably skilled staff, high running costs and lack of compliance with the Council’s vision for elderly person’s accommodation.

2.10. Following its closure, RBKC undertook a review of the existing institution in order to determine its future. A public consultation period was carried out by RBKC from December 2014 to January 2015, and following the formal review of consultation responses, the facility was permanently closed in July 2015 and RBKC made the decision to dispose of the site. RBKC published their preferred option for the site – to be redeveloped as a private extra care facility.
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Planning designations

2.11. According to the Royal Borough of Kensington’s Planning Policy Map the site does not have any site specific planning designations.

2.12. According to the Environment Agency’s Flood Map the site is located within flood zone 1 (less than 1 in 100 annual probability of river or sea flooding).

Heritage assets

2.13. The site is not located within a Conservation Area and the existing building is not locally or statutorily listed.

2.14. There are however, several Conservation Areas which lie close to the site including –

- Cheyne;
- Royal Hospitals;
- Chelsea Park/Carlysle;
- Chelsea.

Image – map showing the location of surrounding Conservation Areas
2.15. St Luke’s Church is approximately 125m from the application site is a Grade I Listed Building.

**Trees**

2.16. The site contains 16 existing trees. These are located in the northern part of the site, along the Dovehouse Street frontage and within the existing courtyard along the eastern boundary. There are seven Tree Protection Orders (TPO) flags on the property. The existing trees are of varying quality, but generally poor to moderate.

**Accessibility**

2.17. The site is in a very accessible location, having a PTAL rating of 6A (excellent). The site is approximately 1km west of Sloane Square station and 730m south of South Kensington station.

2.18. Bus stops KJ and KH are located within a 3 minute walk from the site and are served by 49 and 211 bus services. Many more bus services are also available along King’s Road (approximately 5 minutes walk) and Fulham Road (also approximately five minutes walk).

**Infrastructure**

2.19. The site is located within the safeguarded route for proposed Crossrail 2 (Chelsea Hackney line). It is understood that one of the tunnels is located under the site and there is a planned Crossrail station adjacent to the site.

*Image – Crossrail 2 safeguarding areas
Purple – safeguarding limits; Blue – Area of Surface Interest*
Planning history

2.20. The site has not been subject to any recent planning applications which impact on the current redevelopment scheme.

2.21. The applicant is aware of a series of pre-application meetings which were held with the Council during 2015 (before their involvement in the site). The current proposal has considered RBKC’s advice in so far that it is relevant to the current proposal. Copies of the advice issued by the Borough is appended to this statement at Appendix 1 and a summary is also provided.
3. Proposal

3.1. This planning application proposes the redevelopment of the site to provide an extra care facility (Class C2) comprising 55 units, communal and wellbeing facilities, back of house and service areas, car and cycle parking, landscaping and plant. The proposed building will comprise lower ground floor to fourth floor levels, a part fifth floor level, and part basement level.

3.2. The scheme will comprise a total of 12,203sqm (GIA) over part basement, lower ground, ground to fourth floor levels, and a part fifth floor.

- The part basement will contain the main kitchen, vehicle parking, plant and circulation space only. There will be no resident access to this level.
- The lower ground floor will contain communal and wellbeing facilities, back of house and service areas as well as one extra care unit.
- The ground floor will contain an entrance/lobby space, communal facilities, service space and extra care units.
- The floors above will contain extra care units.

3.3. The extra care facility will comprise 55 self contained extra care units arranged as set out below. The 55 extra care units comprise 60% of the net internal area.

- 19 x 1 bedroom units (35%);
- 3 x 1 plus study units (5%);
- 25 x 2 bedroom units (45%);
- 8 x 2 bedroom plus study units (15%).

3.4. The extra care facility will offer the following services to residents:

- Nursing and personal care services available 24 hours a day 7 days a week;
- Domestic services;
- Access to communal and wellbeing facilities;
- Management, security and emergency support;
- Activities organiser;
- Meals;
- Transportation coordination and valet services.

3.5. The extra care facility will contain a range of communal and wellbeing facilities.

- Reception and concierge;
- Reading room and cafe;
- Gallery;
- Consultation rooms;
- Occupational health rehabilitation area;
- Cinema;
- Dining room;
3.6. The building will also comprise a range of back of house and service areas including main kitchen and associated storage areas, staff rest and dining room, staff changing rooms, storage and plant areas, mobility scooter storage, vehicle parking, refuse and recycling storage and service bays. Nurse’s stations and sluice rooms will also be provided at the upper levels of the building. The communal and wellbeing facilities and back of house and service areas will comprise 40% of the net internal area.

3.7. The proposed scheme will provide two vehicle access points. There will be a drop off facility located along Dovehouse Street providing off-street and level access to entrance/reception area. The second access point will be off Britten Street. This will provide access to a service area on the ground floor for small vehicles such as transit vans, ambulances and hearses. It will also provide access to the car parking facilities located at basement level which will be accessed via a car turntable and car lift, and stored in an automated stacking system. 18 vehicle parking spaces will be provided at basement level and vehicles will be parked using a valet style service.

3.8. Refuse and recycling storage will be provided at ground floor level along with a bike and mobility scooter storage area with the capacity to store 4 mobility scooters and 10 bikes. A substation is also located at ground floor area accessed of Britten Street.

3.9. The proposal will re-establish a traditional building line along Dovehouse Street and Britten Street, will improve the relationship to Dovehouse Green and will create an open garden space within the centre of the site. The proposed building seeks to respond to the various massing contexts which surround the site and will comprise base, middle and top components. The proposed building form can be described as follows:

- A three storey element along the Dovehouse Street frontage which responds to the scale of the residential buildings along the western side of Dovehouse Street. The third and fourth floor levels are setback 7m from this element. A drop off facility has been incorporated along this elevation created by a setback of the ground, first and second floors.
- The building along Britten Street comprises four floor levels and a setback fourth floor level.
- The building to Dovehouse Green comprises five floor levels with a setback fifth floor level.

3.10. The proposed building will comprise the following materials:

- Light brick, reconstituted stone, granite plinth and metal balustrade to the Dovehouse Street elevation. The fourth floor level will comprise metal finish and clear glazing.
- Red brick, light brick, reconstituted stone, granite plinth and metal balustrade to the Britten Street elevation. The fourth floor level will comprise metal finish and clear glazing.
- Red brick, light brick, reconstituted stone, granite plinth and metal balustrade to the Dovehouse Green elevation. The fourth floor level will comprise metal finish and clear glazing.
4. **Pre-application discussions**

4.1. Five pre-application submissions have been made to the LPA over a period of nine months. A schedule of the pre-application submissions made to date is set out below:

<table>
<thead>
<tr>
<th>Pre-application submission</th>
<th>Submission date</th>
<th>Meeting date</th>
<th>Response date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>26 April 2016</td>
<td>18 May 2016</td>
<td>1 June 2016</td>
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<tr>
<td>2</td>
<td>19 September 2016</td>
<td>27 September 2016</td>
<td>Withdrawn</td>
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<tr>
<td>3</td>
<td>16 November 2016</td>
<td>22 November 2016</td>
<td>19 December 2016</td>
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<td>9 December 2016</td>
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<td>5</td>
<td>9 January 2017</td>
<td>11 January 2017</td>
<td>19 January 2017</td>
</tr>
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4.2. Copies of the advice issued by the Borough are appended to this statement at Appendix 1. A pictorial summary of the pre-application submissions are provided at pages 32 and 33 of the accompanying Design and Access Statement.

4.3. The pre application discussions that have been held to date are summarised below. Given the number of meetings and informal discussions held, the feedback has been summarised on an issue by issue basis.

**Land use**

4.4. As part of pre-application 1 the LPA confirmed that an extra care facility falls within Class C2 and the provision of an extra care facility at the site complies with planning policy, in particular Policy CK1 and CH2 (part c). The LPA requested further information in relation to how the proposed development accords with the LPA’s definition of extra care and confirmed that an operator statement would have to accompany a planning application to outline the proposed service provision and management structure of the facility.

4.5. Key operator statement details were provided as part of pre-application submission 3 and the LPA advised that the broad principles were acceptable as part of the pre-application 4 response. However, further clarification was sought in relation to the basic level of care, design features to cater for elderly residents, assistive technology to cater for elderly residents, staff ratios and provisions for dementia patients. Further clarification of these points has been addressed in the operator statement being submitted with this planning application.

**Mix and quality of accommodation**

**Unit mix**

4.6. As part of pre-application 1, the LPA advised that 3 bedroom units were not supported. The mix of extra care units was revised in response to the LPA’s advice and the proposal provides 40% 1 bedroom units (35% 1 bedroom only and 5% 1 bedroom with a study) and 60% 2 bedroom units (45% 2 bedroom only and 15% 2 bedroom with a study). Further consideration of the mix is set out in section 6 of this statement.
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Quality of accommodation

4.7. As part of pre-application 1, the LPA requested further information in terms of unit layout to assess the internal living conditions created for future occupiers. The layout of the development has been developed and detailed internal layouts are being submitted with this planning application. The proposal does not result in any solely north facing single aspect units, and maximises the internal living conditions for future occupiers by creating large openings which maximise access to sunlight and daylight, and offers outlook to private and public open spaces.

Built form, massing and townscape

Building line

4.8. As part of pre-application 1, the LPA advised that the reinstatement of a traditional building line along Dovehouse Street and Britten Street was welcome. As part of pre-application 3, the LPA advised that the building line should be setback to provide further relief to Dovehouse Street. The proposed building line is considered to be an appropriate response to site and surroundings, re-establishing a traditional building line which is consistent with historic form.

Massing and height

4.9. As part of pre-application 1, the LPA confirmed that the surrounding context was varied and that the proposed building would have to sensitively respond to all contexts. The LPA suggested that a storey be removed from the scheme to more appropriately fit in with the surrounding context. The form and massing of the building was revised in response to the LPA’s advice to better respond to the surrounding context including a reduction in building height relative to the emerging Chelsea Farmer’s Market site proposal, a further setback (total 7m) behind the 3 storey shoulder height along Dovehouse Green and further refinement of form along the Britten Street frontage. These changes were considered to result in the building fitting more comfortably within the context, particularly in relation to the residential development along the western side of Dovehouse Street.

4.10. Within the pre-application 2 meeting, the LPA advised that the proposed massing and height was supported in principle, subject to the development of the detailed design. Following the meeting the LPA verbally advised that the massing and height was not supported and suggested that the height of the proposal be reconsidered. Following this advice, further testing of the scheme was carried out including analysis of the proposal in 10 key views. A 3D model was also built which demonstrated how the proposal would fit within the surrounding context. As part of pre-application 3, the LPA acknowledged that following a review of the 3D model, the proposal was considered to sit comfortably within the surrounding existing and emerging context. As such, the proposed massing and height has been retained and further detailed design development has occurred.
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4.11. During pre-application meeting 2 discussions and as part of the pre-application 3 response, the LPA suggested that the height of the Dovehouse Green ground floor be increased to define the base of the building and relate better to the emerging Chelsea Farmer’s Market site proposal. As part of pre-application 3 and 4, it was demonstrated that an increase in the height of the ground floor would result in an increase in overall building height which would be contrary to previous advice given in relation to the massing and height of the building. It was considered that the architectural treatment and materiality of the ground and first floors to Dovehouse Street successfully defined the base of the building without requiring an increase in building height.

Layout

4.12. As part of pre-application 1, the LPA suggested changes to the two storey drop off zone on Dovehouse Street. In response to this advice, the drop off zone was reduced to a single height for pre-application 2. As part of pre-application 3, the LPA advised that the drop off zone along Dovehouse Street was not supported and suggested alternative options including drop off on kerbside or drop off along Dovehouse Green. For pre-application 4, it was demonstrated that the most suitable location for the drop off was Dovehouse Street and the priority is to have this facility off street to cater for elderly residents. Various revised drop off options were then submitted to the LPA for review including a lay by and 5m setback option. Following further discussion with the LPA, the LPA recommended that a reduced setback option be explored. A 2.5m setback option was then submitted to the LPA and the LPA agreed as part of the pre-application 5 response that this was the most appropriate option to take forward.

4.13. As part of pre-application 1, the LPA suggested the colonnade along Dovehouse Street be reduced. The colonnade was reduced in width for pre-application 2.

4.14. As part of pre-application 1, the LPA suggested that Dovehouse Street and Dovehouse Green be activated and suggested that more permeable links be created throughout the site. For pre-application 2, an active use (cafe) was introduced at the ground floor level on the corner of Dovehouse Street and Dovehouse Green. Within the pre-application 2 meeting, the LPA requested further consideration of the active use on Dovehouse Street and Dovehouse Green given its relationship with the adjoining extra care units. For pre-application 3, the active use was omitted in response to the LPA’s advice (and also following consultation with local community groups and Ward Councillors). As part of pre-application 3, the LPA again advised that activation of the Dovehouse Green elevation was required in terms of active use and pedestrian entrances. Two options for the activation of Dovehouse Green were then submitted to the LPA (reading room and cafe in the middle of the elevation or reading room and cafe on the corner adjoining the Chelsea Farmer’s Market site). The LPA confirmed as part of the pre-application 5 response that the corner location was the most appropriate option to take forward.

4.15. As part of pre-application 3, the LPA suggested that separate entrances be provided to the extra care units on the ground floor. It was demonstrated as part of pre-application 4 that providing additional entrances to extra care units was contrary to the LPA’s design guidance for elderly persons accommodation which prefers one single entry point for operational and security reasons. Separate entrances have not been included for this reason.

4.16. Further detail of the built form, massing and townscape evolution is provided within the Design and Access Statement which accompanies this planning application.

January 2017
4.17. As part of pre-application 1, the LPA advised that the emerging architecture was positive and should be developed further.

4.18. During pre-application meeting 2, the LPA suggested further consideration of design elements to treat the scale of the building including size and design of the upper storeys, building composition, framing, parapet lines and materiality. The LPA also suggested the alignment with the adjacent scheme should be revised. As part of pre-application 3, the design of the building was revised following further consideration of building composition, proportions, framing, solid to void ratios, modulation and materiality. The revised scheme comprised a defined based, middle and top component, shallow framing, 30/70 solid to void ratio, single windows and materials including brick, glass mansard and frameless dormers.

4.19. As part of pre-application 3, the LPA suggested further consideration of design elements to treat the scale of the building and enhance the architectural treatment. The LPA suggested that the Dovehouse Green and Dovehouse Street elevations be treated separately to differentiate that status of architecture within the development. As part of pre-application 4, it was demonstrated that these elevations had been treated differently and further consideration was given to the palette of materials used within the building.

4.20. During the pre-application 2 and 3 discussions, the LPA also suggested the omission of some projecting balconies, the omission of the transition element along Britten Street, the reduction of high level terraces, change to the proportions of glazing on the top storey facing Dovehouse Green and re-consideration of the palette of materials. The proposal was revised in response to these suggestions as part of pre-applications 3 and 4.

4.21. Further detail of the design and architecture evolution is provided within the Design and Access Statement which accompanies this planning application.

Subterranean development

4.22. As part of pre-application 1, the LPA advised that the extent of the basement was not supported and that they did not consider the site to be a ‘large site.’ The LPA requested further information in regards to construction traffic management and whether this traffic could be accommodated on site.

4.23. The extent of basement was substantially reduced in response to the LPA’s advice. The basement level was revised to comprise essential service and plant areas only (no resident access) and equates to a 60% reduction from the pre-application 1 submission.

4.24. A Construction Traffic Management Plan and Construction Management Plan were submitted to the LPA as part of the subsequent submissions. These plans demonstrated that all construction traffic could be accommodated on site, in line with the LPA’s basement policy. Pre-application response 4 confirmed that the submitted CTMP was generally acceptable, but requested evidence that construction traffic is able to manoeuvre within the site. This information has been included in the Construction Traffic Management Plan being submitted with this planning application.

Highways and transport
Off-street servicing

4.25. As part of pre-application 1, the LPA advised that a drop off zone on Dovehouse Street was supported in highway and transport terms. The LPA encouraged an off-street servicing facility and in response to the pre-application 1 advice, the off-street servicing and delivery area was revised.

Parking

4.26. As part of pre-application 1, the LPA did not support the proposed 36 vehicle parking spaces. Following this advice, the number of vehicle parking spaces was reduced to 18 and as part of the pre-application 2 discussions, the LPA advised that 18 vehicle parking spaces could be supported. Pre-application advice 4 confirms that 18 off-street vehicle parking spaces are acceptable within an automated car stacker system accessed via a car lift.

4.27. Within the pre-application 2 meeting, the LPA requested further information in regards to the accessibility of the vehicle parking and questioned whether a traditional vehicle parking arrangement could be accommodated. Information was submitted to the LPA as part of pre-application 3 which demonstrated that a traditional vehicle parking arrangement would require a considerable increase in basement excavation (the automatic stacked system was preferred). Pre-application 3 was accompanied by a Transport Statement which provided details on the function of the proposed car lift and automated car stacking system. As set out in the previous paragraph, pre-application advice 4 confirms that an automated car stacker system accessed via a car lift is appropriate.

4.28. In response to pre-application 1, a secure cycle parking was provided at ground floor level for the use of both staff and residents and 20 cycle parking spaces were provided. Within the pre-application 2 meeting, the LPA advised that a lesser amount of cycle parking could be provided due to the nature of expected occupants and that the cycle parking space could be shared with mobility scooters. The proposal was then revised to provide combined parking for 10 bikes and 4 mobility scooters which is considered to be an appropriate provision for the proposed development.

Construction traffic management

4.29. Within the pre-application 2 meeting, the LPA advised that there were no in principles objections to the submitted Construction Traffic Management Plan and Construction Management Plan. As part of pre-application 3, the LPA requested studies of alternative routes to consider the redevelopment of adjacent sites and these additional studies were then submitted to the LPA. Pre-application response 4 confirmed that the submitted Construction Traffic Management Plan was acceptable but requested evidence that construction traffic is able to manoeuvre within the site. This information has been included in the Construction Traffic Management Plan being submitted with this planning application.

Waste Management Strategy

4.30. Pre-application response 4 confirms that the submitted Waste Management strategy is acceptable.

Travel Plan
4.31. Pre-application response 4 confirms that the submitted Travel Plan is largely acceptable with the exception of minor revisions. These revisions have been made in line with the LPA’s advice and are being submitted as part of this planning application.

Transport Assessment

4.32. Pre-application response 4 confirms that the submitted Transport Assessment is largely acceptable with the exception of the consideration of the forecast trip generation and minor revisions. These revisions have been addressed in the Transport Assessment bring submitted with this planning application.

Amenity

4.33. As part of pre-application 1, the LPA requested further information in relation to sunlight/daylight, privacy and sense of enclosure impacts. A Daylight and Sunlight report is being submitted with this planning application and amenity impacts are discussed in further detail in section 6 below.

Trees and landscaping

4.34. As part of pre-application 1, the LPA advised that the removal of existing on-site vegetation could be accepted given that the trees are not of high value. The LPA requested further detail of mitigation planting and planting within the central garden space. A tree mitigation strategy was prepared and submitted to the LPA as part of the pre-application submissions.

4.35. Pre-application response 4, requires that further consideration is given to the crowns of the London Plane trees along the site boundary with Dovehouse Green. Pre-application response 4 considers that the mitigation planting is not sufficient and would reduce publically visible tree cover. Furthermore, it considers that planting in raised beds is not appropriate.

4.36. The Arboricultural Report has been revised to consider the crowns of the London Plan trees along the Dovehouse Green boundary. The Mitigation Planting Proposal and Landscaping Report have been revised to clarify that 7 replacement trees along the Britten Street and Dovehouse Street frontages will be provided within soil and 2 additional trees will be provided at the entrance of the extra care facility within planter boxes. Furthermore, it is noted that 7 TPO trees will be replaced with 9 publically visible trees and 10 trees within the internal garden.

Sustainability

4.37. Pre-application response 4 confirms that the submitted Energy Statement and Sustainability Strategy are acceptable.

Environmental quality

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4.38. Pre-application response 4 considers that further detail must be included in the Construction Environmental Management Plan. The Construction Environmental Management Plan has been revised and is being submitted as part of this planning application.

*Flood Risk*

4.39. Pre-application response 4 confirms that the site is has a low risk of fluvial and tidal flooding, and does not fall within a Critical Drainage Area. The response requires the basement to be protected from sewer flooding and waterproofed. The Drainage Management Plan being submitted with this planning application has been revised to respond to these points.

*Sustainable Drainage Systems*

4.40. Pre-application response 4 requests further information in relation to the capacity of the attenuation tank and pool holding tank, the percentage of surface water run-off reduction and the feasibility of additional SUDs. The Drainage Management Plan being submitted with this planning application has been revised to respond to these points.
5. Relevant planning policy

5.1. The following national and local planning guidance and policies are relevant to the proposal:

National Planning Policy Framework

5.2. The National Planning Policy Framework (March 2012) (NPPF) sets out the Government’s planning policies for England and is a material consideration in determining planning applications.

5.3. At the heart of the NPPF (paragraph 14) is a presumption in favour of sustainable development. The NPPF states, at paragraph 17, that planning should proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs. High quality design and a good standard of amenity for all existing and future occupants of land and buildings should be sought.

5.4. With regard to decision-taking, the NPPF advises that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development and should look for solutions rather than problems. Decision-takers at every level should seek to approve applications for sustainable development where possible (paragraphs 186 and 187).

5.5. One of the core principles of the NPPF states that planning should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives.

Regional and Local Planning Policy

5.6. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan for an area, unless any material considerations indicate otherwise.

5.7. The development plan comprises the Consolidated Local Plan and the London Plan. There are also a number of Supplementary Planning Documents (SPD) which support the ‘development plan’ and provide guidance in relation to the redevelopment of the site including Subterranean Development, Transport, Planning Obligations and Trees and Development.

5.8. RBKC published design guidance in November 2015 titled ‘Older People’s Housing Design Guidance.’ This guidance aims to provide details on the building design and service provision for extra care housing. This has been commonly referred to throughout this statement.
6. Planning considerations

6.1. The following section discusses the proposal in relation to planning policy and material considerations, and is set out under the following headings:

- Land use;
- Mix and quality of accommodation;
- Built form, massing and townscape;
- Design and architecture;
- Subterranean development;
- Amenity;
- Landscaping;
- Trees;
- Highways and transport;
- Energy and sustainability;
- Environmental quality.

**Land use**

6.2. The existing planning use of the site is a nursing and care facility (Class C2) operated as Thamesbrook. Thamesbrook was closed in 2014 following an outbreak of intractable Legionella bacteria and an assessment which concluded that the facility did not comply with required operational standards or Borough’s vision for elderly persons accommodation.

6.3. The proposal involves the redevelopment of the site to provide an extra care facility (Class C2). The Applicant’s vision is to provide a high quality, fit for purpose alternative to retirement living, alongside best in class extra care for residents of the Borough.

6.4. Extra care facilities (where providing a sufficient level of care) fall within Class C2 Residential Institutions of the Use Classes Order (1987 as amended) – *use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses)); use as a hospital or nursing home; and use as a residential school, college or training centre.*

6.5. This is confirmed by the Borough’s *Older People’s Housing Design Guidance* (OPHDG) (adopted in November 2015) which provides clarification regarding the land use classification of extra care facilities. Section 5 (page 21) of this document clearly sets out – *For planning purposes the Royal Borough of Kensington and Chelsea regards extra care housing as Use Class C2 (Residential Institutions).*

6.6. On this basis, a change of use is not required as the proposal will continue the existing Class C2 use of the site.

6.7. Paragraph 30.3.4 of the Borough’s *Consolidated Local Plan* lists care homes/care facilities as a type of social and community use. As such, the proposal is considered in relation to *Policy CK1* and part C of *Policy CH2.*
Policy CK1 states that the Council aims to protect and/or enhance social and community uses, and supports new facilities. New uses will be permitted where they predominantly serve, or provide significant benefit to, the Borough’s residents. Existing land and/or buildings where the last use was a social or community use should be reused to the same, similar or related use.

Policy CH2 – Extra care housing will be provided, particularly in the south of the Borough.

6.8. The CLP defines extra care housing as – an alternative to residential care, helping older people to live as independently as possible and offering self-contained accommodation in a choice of tenures with access to a wide range of 24 hour care on site. Schemes may also provide communal areas, hairdressing and laundry services, hobby rooms and a shop.

6.9. Section 2 (page 9) of the Borough’s OPHDG document defines extra care housing as – self-contained accommodation designated for older people in a setting where care and support can be provided as required from an on-site care provider.

6.10. The proposal accords with these definitions, providing 55 self-contained units for elderly residents (minimum age of 65 years) where nursing and personal care is provided on-site by Draycott Nursing and Care 24 hours a day, 7 days a week. The proposal also provides a range of communal facilities and services including reception and concierge, reading room and cafe, gallery, consultation rooms, occupational health and rehabilitation area, cinema, dining room, hydrotherapy pool, sauna and steam room, healthcare workshop and health care studio, communal and assisted WC facilities, mobility scooter and cycle storage.

“Helping older people to live as independently as possible offering self contained accommodation with access to 24 hour care on site… and community facilities” Local Plan
6.11. Section 2 (page 10) of this guidance sets out best practice principles for extra care facilities and these principles are considered to be appropriate tests to confirm that proposals fall within the definition of extra care and within planning use class C2. These principles include independent living, sustainable communities, on-site care team, flexible care services, active ageing, intergenerational/community interface, building design, technology, intermediate care, outreach/home care services and provision for dementia.

6.12. The proposal accords with these best practice principles for extra care facilities as set out below:

- The extra care facility will provide self-contained units comprising bedroom, bathroom, dining, living and kitchen facilities. The self-contained element will allow residents to maintain a level of independence and privacy, while also having the flexibility to access to a range of communal and wellbeing facilities on-site. Each self-contained unit has the ability to be adapted to suit resident’s needs as they age. Each self-contained unit has the ability to accommodate residents with varying nursing and care requirements (low, medium and high).

- The extra care facility will offer 55 units comprising 1, 1+, 2 and 2+ bedroom units.

- The extra care facility will provide an opportunity for residents to own their own units, with secure leaseholds.

- The extra care facility will include a range of nursing, personal and domestic care services. These services will be available 24 hours a day, 7 days a week. Nursing and care will be provided by an on-site team coordinated by Draycott Nursing and Care. Additional services including management, security and emergency support, activities organiser, meals and transportation coordination and valet services will also be available on site.

- The extra care facility will accommodate persons who are aged 65 years and older.

- The extra care facility will be able to accommodate households with varying needs including low (up to 2.5 hours of care per week), medium (between 2.5 and 15 hours of care per week) and high (over 15 hours of care per week).

- Residents will be subject to an initial needs test to determine their required level of care. Care packages will be tailored to each resident, subject to a minimum level of care equating to the low care category. Residents will have the flexibility to change their package throughout their residency (subject to the minimum care requirement being met).

- The extra care facility will comprise a range of communal areas and shared facilities including reception and concierge, reading room and cafe, gallery, consultation rooms, occupational health and rehabilitation area, cinema, dining room, hydrotherapy pool, sauna and steam room, healthcare workshop and health care studio, communal and assisted WC facilities, mobility scooter and cycle storage.
The extra care facility will encourage active ageing with the provision of gym and hydrotherapy pool. Residents will also have access to a private internal garden and the adjacent public open space, Dovehouse Green. A number of the communal areas and shared facilities are able to be used to hold social events and activities including the reading room and cafe, gallery, cinema, dining room, healthcare workshop and health care studio. The extra care facility will have an activities organiser who will coordinate active and social programs, as well as lifestyle events.

The operator is exploring the possibility of older people from the surrounding community visiting the development to interact with residents and utilise the communal and wellbeing facilities. The reading room/cafe located on the ground floor would provide an opportunity for residents to meet and interact with family members, friends and elderly people from the local community in a social capacity.

The building has been designed to provide a safe and enabling environment for future residents. The overall layout of the building achieves logically laid out space, cores, zones, minimised corridors, wheelchair compliance and security measures.

The building has been designed to allow for smart and assistive technology to be installed where required.

Nursing and care will be provided on-site by Draycott Nursing and Care. Draycott Nursing and Care was founded by Angela Hamlin (a qualified nurse and midwife) in December 1996. DNC provide nurses and carers to look after clients/patients in their own homes. Draycott Nursing and Care will continue to provide this existing service to clients/patients but envisages that the extra care facility will provide further opportunities to expand their network and client base throughout RBKC.

The building has been designed to accommodate residents suffering dementia through the use of dementia friendly design principles and also has the flexibility to accommodate dementia care facilities and technology where required.

6.13. On this basis, the proposal will comply with Policy CK1 and Policy CH2.

6.14. In addition to complying with the Borough’s land use policies, the proposal will also bring forward significant benefit for the Borough and its residents. There is a gross deficiency of suitable accommodation for elderly people within the Borough, despite the elderly population increasing at a notable rate. The demand for specialist elderly person’s accommodation is not limited to the Borough, but is also a trend that is being experienced across London and throughout the United Kingdom. The need for additional accommodation for elderly people is reflected in planning policy and guidance at a National, regional and local level. A summary of this policy and guidance is set out below:

- The Government’s Laying the Foundations: A Housing Strategy for England (November 2011) states – some 60 per cent of projected growth in households to 2033 will be aged 65 and older.
The National Planning Practice Guidance (PPG) states – *The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied.*

The London Plan states – *there is significant need for affordable family homes, and those that meet the requirements of smaller households, as well as more specialist needs such as those of London’s growing numbers of older people. The Mayor has identified the growing and changing requirements for housing older people in London as one of the most important emerging planning issues for London. It is anticipated that between 2011 and 2036 ‘over 65s’ could increase by 64% and ‘over 90s’ could grow in number by 89,000.*

The London Plan states – *research suggests that the choices open to older Londoners to move into local specialist housing may have been constrained through inadequate supply... extending these choices through a higher level of specialist provision will in turn free up larger homes for family occupation.*

The Modernising Older People’s Housing and Accommodation with Care Services Strategy 2013 states – *the Council’s vision is to improve the quality, quantity and choice of housing and accommodation with care services options for older people in the borough. The Council’s aim is to – maximise independence, reduce health and social care costs and improve housing choices for older people.*

The Older People’s Housing Design Guidance states – *The Royal Borough of Kensington and Chelsea is facing challenges arising from an ageing population at a time when local authorities need to use their resources more efficiently.*

The Older People’s Housing Design Guidance also states – *a significant proportion of older people’s housing in Kensington and Chelsea is not fit for purpose. The quality of some of the accommodation does not achieve modern design and care standards or the aspirations of older people.*

6.15. The proposed development provides a unique opportunity to respond to the current shortage of accommodation for elderly people. There is a strong policy context for providing a facility of this nature and the proposal will bring forward significant benefit in doing so. The benefits of the proposed use (extra care) are summarised below:

- Care can be delivered at a lower cost than retirement homes – as required rather than a set amount.

- The intensity of care can be adjusted – provides flexibility, care changes as per the individual/households needs change.
Individuals/households can remain in their homes – can accommodate a wide range of needs including end of life care.

Individuals/households moving to extra care housing can free up larger dwellings for use by families.

Older people can live independently but as part of a community.

Couples do not need to be separated.

Care provided within an extra care development can provide reductions in hospital visits and dependency on the National Health Service (NHS).

6.16. In concluding the land use section of this statement, it is considered that the redevelopment of the site will bring forward a high quality extra care facility which is fully compliant with current standards and fit for purpose. The proposal will accommodate 55 households and will enable elderly people to age comfortably and discreetly in their own homes while having access to nursing and care, 24 hours a day, 7 days a week. Nursing and care will be provided by an established nursing and care provider Draycott Nursing and Care.

6.17. Residents will have access to a range of communal and wellbeing facilities, will have the opportunity to interact with other elderly people both within the facility and the surrounding community. The scheme has developed in line with the Borough’s OPHDG which was adopted in November 2015 and sets out a range of best practice principles for extra care facilities. The proposed scheme will be state of the art with the opportunity to integrate assistive technologies and accessible design where required by residents.

6.18. We believe that the redevelopment of the site for extra care housing will be of significant benefit to the Borough which currently has a gross deficiency of elderly people’s accommodation. As set out previously, there is an increasing demand for specialist accommodation in the Borough which is able to accommodate older people with specific care needs. The scheme will clearly deliver significant opportunity to the elderly residents of the Borough.

6.19. As part of the pre-application discussions, the LPA have confirmed that the proposed use falls within Class C2 and complies with Policy CK1 and part C of Policy CH2.

6.20. This planning application is supplemented by an Operator Statement which provides further detail of the proposed operation.

Mix and quality of accommodation

Mix

6.21. The proposed scheme will comprise:

- 19 x 1 bedroom units (35%);
- 3 x 1 plus study units (5%);
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- 25 x 2 bedroom units (45%);
- 8 x 2 bedroom plus study units (15%).

6.22. There is no Consolidated Local Plan (CLP) policy relating to the mix of units for extra care housing. It is acknowledged that the Borough’s Older People’s Housing Design Guidance (adopted in November 2015) sets out the Council’s preferred unit mix of 80% one bedroom and 20% two bedrooms. However, a greater percentage of two bedroom units are being proposed to accommodate households which comprise two people and also to support the varying needs of elderly occupants who require care. Due to their age, health conditions and care needs, it is typical for couples to sleep in separate bedrooms allowing carers to attend to one occupant, without disturbing the other.

6.23. The higher provision of two bedroom units is justified by research and reviews of housing need for the elderly including Demos (2013) and the Joseph Rowntree Foundation (2012). The following statement from Joseph Rowntree Foundation is noted:

"Two bedrooms is the minimum that most older people will consider, to have enough space for family visitors, a carer, storage, hobbies, or separate bedrooms for a couple. Analysis of moves by older households in the last five years within the private sector (rent or owner-occupier) shows that 87 per cent move into a dwelling with two or more bedrooms."

6.24. The number of two bedroom units has reduced following pre-application discussions with the LPA.

Space and layout

6.25. The Borough’s Older People’s Housing Design Guidance (adopted in November 2015) sets out minimum internal space standards including 60sqm for 1 bedroom / 2 persons (wheelchair accessible) and 74sqm for 2 bedroom / 3 persons (wheelchair accessible). The proposed extra care facility will provide a range of unit sizes ranging from 62sqm to 194sqm. Therefore, the units comply with the minimum space standards for 1 bedroom and 2 bedroom units (wheelchair accessible).

6.26. The Borough’s Older People’s Housing Design Guidance (adopted in November 2015) sets out that 90% of units are to exceed Building Regulations (AD part M) category M4(2) and 10% of units are to exceed Building Regulations (AD part M) category M4(3). The units have been designed to these standards.

6.27. The internal layout of the scheme maximises the amount of dual aspect units and does not comprise any directly north facing single aspect units. All units will have acceptable levels of outlook, with many benefiting from views to the central garden space or Dovehouse Green. The floor to ceiling heights within the building are generous ranging from 3m at the lower ground and ground floors, 2.7m in lounges and bedrooms and 2.45m in bathroom and kitchens. The scheme has been tested to determine the internal light levels and all units will very good levels of light.

6.28. In terms of open space, all residents will have access to the internal garden area which is accessed from the lower ground floor level. The reading room/cafe on the ground floor level will provide indoor and outdoor space overlooking Dovehouse Green. As set out in previous sections, all residents will also have access to many communal and wellbeing facilities within the building including occupational health rehabilitation area, cinema, hydrotherapy pool, sauna and steam room.
6.29. Further details of the proposed layout and design of the building are provided within the accompanying Design and Access Statement prepared by PDP LDN and the Operator Statement prepared by Draycott Nursing and Care, Auriens Limited and Savills. These documents include an assessment of how the proposed building complies with the Older People’s Housing Design Guidance and HAPPI principles.

Demolition, design and townscape

Demolition

The existing building is an irregular shape, is setback from the site boundaries and features red brick and a flat roof. The building is considered to be unremarkable. It does not positively contribute to the townscape and was confirmed as not fit for purpose as a care home. As such, the building is not considered worthy of retention and there are no planning policies in place preventing demolition as the site is not of any architectural merit and is not located within a conservation area nor is the building listed.

Proposed massing and height

6.30. The replacement building has been considered in relation to planning policies CL1 and CL12 which state:

- CL1 – The Council will require all development to respect the existing context, character and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions, including being inclusive for all. Development must contribute positively to the townscape considering elements such as scale, height, proportion, building lines, materials. The density of development must be optimised and must consider adjacent sites where these are suitable for redevelopment.

- CL12 – The Council will require new buildings to respect the setting of the Borough’s valued townscape and landscapes, through appropriate building heights. Proposals should strengthen the traditional townscape and reflect the prevailing heights and provide a roofspace that reflects the context of the site.

6.31. The proposed layout of the building has been informed by the historic context of the site. The proposed development seeks to reinstate a building footprint which is reflective of the historic context, and which will create a stronger built edge and relationship to the street, as well as a positive interface with Dovehouse Green. The proposed footprint will provide a usable outdoor space in the centre of the site. The reinstated building line along Dovehouse Green will more successfully relate to the new development along the western side of Dovehouse Street and repair the existing fractured urban grain.
In terms of massing and height, the site sits within a varied context of development:

- Residential properties along the western side of Dovehouse Street.
- Institutional buildings along the eastern side of Dovehouse Street, Britten Street and Sydney Street.
- Commercial buildings around Dovehouse Green and along King’s Road.
- Emerging context of primarily residential led development on the Chelsea Farmer’s Market site.

6.33. Existing building heights in surrounding area generally range from 1 to 5 storeys, with some examples of building comprising 6 storeys.
Image – showing the number of storeys in the surrounding area. The emerging proposal on the Chelsea Farmer’s Market site comprises up to 6 storeys.

6.34. The proposal seeks to respond to this varying context and mediate between the buildings of different scale and design as follows:

- A 3-storey building element is created along Dovehouse Street to respond to the adjacent residential development along the western side of Dovehouse Street.
- The upper floors (third and fourth) along Dovehouse Street are setback 7m to minimise their visibility from Dovehouse Street. These upper floors are reflective of the height of the institutional buildings to the north along the eastern side of Dovehouse Street and those along Britten Street.
- A 4-storey shoulder height is created along Britten Street to respond to the emerging development on the Chelsea Farmer’s Market site. A set back fourth floor level is continued around from the Dovehouse Street elevation.
- To Dovehouse Green the building comprises five floor levels with a setback fifth floor level. This height responds to the emerging development on the Chelsea Farmer’s Market site which has taken cues from the workhouses located on the corner of the King’s Road and Sydney Street.
Image – image showing the relationship between the existing development on the western side of Dovehouse Street and the proposed development on the eastern side of Dovehouse Street. A 3 storey shoulder height is retained to Dovehouse Street with additional storeys set back 7m to minimise visibility from the street level.

Image – image showing the existing relationship between the Chelsea wing on the eastern side of Dovehouse Street and the residential development on the western side of Dovehouse Street. There is a noticeable difference in the scale of development along the eastern side of Dovehouse Street (taller and of greater scale, more institutional type buildings) and the western side of Dovehouse Street (shorter, residential type buildings).
Image – image showing the relationship between the proposed building on the eastern side of Dovehouse Street and the existing residential building along the western side of Dovehouse Street. The proposed development will replicate the existing relationship between buildings on each side of Dovehouse Street i.e. taller buildings on the east and shorter, residential type buildings on the west.

Image – showing where the preceding two sections have been taken along Dovehouse Street.
Image – image showing the proposed relationship of buildings around Dovehouse Green. The image demonstrates that the proposed building will sit comfortably within the context of surrounding buildings, particularly those to the east of Dovehouse Green. The proposed building mass and height to Dovehouse Green will result in a more suitable enclosure of Dovehouse Green which will enhance the containment of this space.

6.35. The proposed massing and height has been tested within 10 key views surrounding the site. The accompanying Heritage and Townscape Visual Impact Assessment prepared by Cityscape and Tavenors provides a commentary of these views and provides an assessment of the proposal in relation to townscape matters.

6.36. It is considered that the proposal accords with Policy CL1 and Policy CL12 as follows:

- The massing and height of the proposal is contextual, with reference to surrounding buildings as set out in the preceding paragraphs.
- The proposal will reinstate a building footprint which reflects the historic development of the site and creates a strong street edge and perimeter block development.
- The proposal will create a stronger built edge to the street which is reflective of surrounding development.

Detailed design

6.37. The replacement building has been considered in relation to planning policy CL2 which states:

- Policy CL2 – The Council will require all development to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area. Development must be functional, robust, attractive, locally distinctive, sustainable, inclusive and secure. An appropriate architectural style will be required.
6.38. The proposed design and architecture has been designed to be sensitive to the prevailing character and building typologies, while being confident and deliberate in its own right. The building takes reference from a typical Georgian style, to include an architectural composition formed by base, middle and top components. The proposed building design also has regard to plot sizes which and soil to void ratios which are characteristic of the surrounding context.

6.39. The proposed materials and detailing also take cues from Georgian buildings which can be found in the surrounding Conservation Areas (while acknowledging that the subject site is not located within a Conservation Area). The proposed material and detailing varies around the building in response to the varied contexts:

- Light brick, reconstituted stone, granite plinth and metal balustrade to the Dovehouse Street elevation. The fourth floor level will comprise metal finish and clear glazing.
- Red brick, light brick, reconstituted stone, granite plinth and metal balustrade to the Britten Street elevation. The fourth floor level will comprise metal finish and clear glazing.
- Red brick, light brick, reconstituted stone, granite plinth and metal balustrade to the Dovehouse Green elevation. The fourth floor level will comprise metal finish and clear glazing.

6.40. The proposed building will restore the existing fragmented townscape created by the existing building and will result in a contextual and high quality building. On this basis, it is considered that the proposal complies with CL2.

6.41. Further detail of the detail design architecture is provided with the Design and Access Statement which is accompanying this planning application.

Layout and C2 use

6.42. The type and nature of the use (extra care facility) demands and influences how the building is laid out and designed. The LPA’s Older People’s Housing Design Guidance (OPHDG) and Housing an Ageing Population: Panel for Innovation (HAPPI) principles are the key documents which have influenced how the proposed building is laid out. Key layout considerations are as follows:

- Cores and circulation – the OPHDG states that ‘building layout should be simple to understand for way finding,’ ‘circulation spaces in buildings for older people should be clear and rational,’ ‘breaking down the building into identifiable zones’ and ‘careful planning can reduce the length of corridors, thus reducing travel distances’ (a maximum 30m corridor length is recommended).

- Drop off zone – the OPHDG states ‘ensure that residents can be dropped off and picked up by minibuses, taxis and ambulances close to the main entrance,’ ‘a drop off zone, used by ambulances, minibuses and taxis, must be incorporated at the main entrance (this area would ideally be covered to enable residents to alight from a vehicle and enter without getting wet during bad weather.’

- Entrances to the building – the OPHDG states ‘entry points to the site should be kept to a minimum and, if more than one, should lead directly to the main entrance door or service areas.’
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6.43. In response to this guidance, a drop off zone has been provided along Dovehouse Street which will directly link to the reception area. The drop off zone and reception area are located in the centre of the site with cores located an equal distance away on either side. This arrangement is critical to break the building into zones and reduce travel time for elderly people when moving through the building. The reception area also provides a single point of entry which is imperative for operation and security reasons.

Subterranean development

6.44. The proposal comprises a lower ground floor level and part basement level:

- The lower ground floor level will comprise communal and wellbeing facilities, back of house and service areas as well as one extra care unit. The lower ground floor level will open onto the internal garden area.
- The part basement level will contain the main kitchen, vehicle parking, plant and circulation space. No resident access to this level will be provided.

6.45. Two subterranean levels (lower ground and basement) are considered necessary to bring forward the proposed extra care scheme. An extra care facility requires a considerable amount of communal and wellbeing facilities, back of house and service areas in order to deliver the type and quality of service which is envisaged by the Borough (as set out in the OPHDG) and as demanded by the market.

6.46. The proposed subterranean development has been considered in relation to Policy CL7 which provides specific criteria in relation to subterranean development. It also includes exceptions for ‘large sites.’

6.47. The site is considered to share characteristics with a ‘large site’ as set out below and as such, the proposal has regard to the criteria for a ‘large site:’

- The proposal involves the complete redevelopment of the site.
- The site is adjoined by non-residential uses and is located within very close proximity to the King’s Road (separated by Dovehouse Green only). A substantial portion of the King’s Road is designated as either a Major Shopping Centre or District Shopping Centre by RBKC’s Planning Policies Map.
- There are currently no residential uses within the block.
- The site has characteristics of a site which ‘comprises a substantial part of an urban block.’ The site has roads on two sides (Dovehouse Street and Britten Street) and is adjoined by a public open space (Dovehouse Green) on another side.
- The site does not currently share a boundary with residential development.
- The site has an area (0.3ha) which is significantly larger than the average site size in the Borough. It extends approximately 60m along Dovehouse Street, has a frontage of 36m to Britten Street and has a frontage of 43m to Dovehouse Green.
- The site is able to accommodate all plant, equipment and vehicles associated with the construction of the proposed basement. A draft Construction Method Statement and Construction Traffic Management Plan is being submitted with this pre-application submission.
- The site only is adjoined by one site only. This site is currently in non-residential use, being occupied by the Chelsea Farmer’s Market.
6.48. In terms of Policy CL7, we believe the proposal complies as follows:

- The site is not subject to an extant or implemented permission for a basement (the proposal involves the complete redevelopment of the site).
- The scheme will result in the loss of existing trees. However, the LPA have agreed that this is appropriate subject to mitigation planting being provided. This planning application is accompanied by a Tree Mitigation Plan prepared by Randle Siddeley.
- Points e and f of CL7 do not apply to the development as the site is not located in a Conservation Area, the existing building is not listed and the proposal involves the complete redevelopment of the site.
- The scheme does not propose lightwells and railings to Dovehouse Street or Britten Street.
- Point h of CL7 does not apply to the development as the proposal involves the complete redevelopment of the site.
- The proposal includes a sustainable drainage system including green roof and attenuation tanks. This planning application is accompanied by a Drainage Report prepared by Watermans.
- The lower ground and basement floors do not extend beyond the building envelope of the upper floors. The central garden space will not be affected by any subterranean development and will therefore provide opportunities for planting.
- A Construction Method Statement and Construction Traffic Management Plan prepared by Knightbuild are being submitted with this planning application. The CTMP demonstrates that all construction vehicles, plant and equipment can be within the site during construction. It also demonstrates how construction traffic will be appropriately managed to minimise impact on surrounding neighbouring properties.
- Point m of CL7 does not apply to the development and the proposal involves the complete redevelopment of the site.
- The basement will be protected from sewer flooding. This planning application is accompanied by a Drainage Report prepared by Watermans.

6.49. The quantum of subterranean development has been significantly reduced during pre-application discussions with the LPA. The basement level has been reduced from 2,617sqm (GEA) to 1,574sqm (GEA) which equates to a 60% reduction.

6.50. The Construction Management and Construction Traffic Management Plans have been subject to several revisions as a result of pre-application discussions with the LPA. We understand that these plans are now agreed with the LPA.

Amenity

6.51. The proposed building has been designed to have regard to and minimise amenity impacts on surrounding residential properties. The surrounding residential properties which have been duly considered as part of the design development include:

- 121 Sydney Street – residential development located on the western side of Dovehouse Street.
- 123 Sydney Street – residential development located on the western side of Dovehouse Street.
- 23-51 Dovehouse Street – residential development located on the western side of Dovehouse Street.
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- Henry Moore Court – residential development located directly opposite the site on the western side of Dovehouse Street.

6.52. There are no other properties which will be affected by the proposal as a result of their proximity to the site.

6.53. The impacts on these properties have been considered in relation to Policy CL5 which states the Council will require all development to ensure good living conditions for occupants of new, existing and neighbouring buildings. Proposals should address sunlight and daylight, visual privacy, sense of enclosure and the reasonable enjoyment of buildings.

Sunlight and daylight

6.54. The explanatory text relating to Policy CL5 states that in considering proposals, the Council will not be seeking to ensure that they meet any particularly minimum or maximum standards and that the assessment of the affect of a proposal will be based on the extent to which the proposal involves a significant and unreasonable worsening of light conditions for those properties assessed, taking into account the prevailing general standard of light in that local environment.

6.55. This planning application is accompanied by a sunlight and daylight report prepared by Point 2 Surveyors which tests the scheme in line with the BRE guidelines. The tests set out in the BRE guidelines were considered to be an appropriate way to appraise the scheme, while taking account of the sites central London location and the nature of surrounding development.

6.56. The BRE report finds that the proposal will comply with the BRE recommendations for daylight and sunlight in relation to 121 and 123 Sydney Street.

6.57. The BRE report finds that the proposal will comply with the BRE recommendations for sunlight in relation to 23-51 Dovehouse Street. In terms of daylight, 91% of rooms comply with the BRE recommendations. There are 7 windows which breach the 20% daylight recommendation however, the maximum percentage loss is 28% only. Furthermore, the retained VSC ranges between 22% and 26%. This is considered to be a minor breach of the BRE recommendation and is considered appropriate within the central London context of the site.

6.58. The BRE report finds that sunlight considerations are not relevant for Henry Moore Court (due to the orientation of windows). In terms of daylight, 61% of rooms comply with the BRE recommendations. There are 27 windows which breach the 20% daylight recommendation however, the maximum percentage loss is 29% only. Furthermore, the retained VSC ranges between 21% and 26%. This is considered to be a minor breach of the BRE recommendation and is considered appropriate within the central London context of the site.

Privacy and overlooking

6.59. The proposed building is located a sufficient distance away from 121 and 123 Britten Street to prevent privacy and overlooking concerns.
6.60. The proposed building will result in an 11m separation distance (approximately) between the proposed building and 23-51 Dovehouse Street and Henry Moore Court (with an additional 2.5m in relation to the drop off zone) at the ground, first and second floors. It is acknowledged that the proposed development will bring the building line (and openings) closer to Dovehouse Street, however it is not considered that the reduction in separation distance will materially compromise 23-51 Dovehouse Street and Henry Moore Court in terms of privacy and overlooking. The relationship between the proposed building and 23-51 Dovehouse Street and Henry Moore Court is not uncommon between existing properties fronting a street in the surrounding area.

6.61. The 7m setback to the upper levels along Dovehouse Street (third and fourth floor levels) will prevent privacy and overlooking concerns from these levels.

**Sense of enclosure**

6.62. The 11m separation distance (approximately) between the proposed ground, first and second floor levels, and 23-51 Dovehouse Street and Henry Moore Court (with an additional 2.5m in relation to the drop off zone) will mitigate sense of enclosure impacts. The setback upper levels (7m) seek to reduce the impact of building mass as experienced along Dovehouse Street and will therefore reduce a sense of enclosure to these properties. The drop off zone created by setting back the ground, first and second floors (2.5m) will provide variation along the Dovehouse Street elevation and by doing so, will also manage sense of enclosure impacts to properties on the western side of Dovehouse Street.

6.63. The application site adjoins the Chelsea Farmer’s market site which currently comprises non-residential use. A proposal for a primarily residential led scheme is currently being considered by the LPA. The proposed building has been designed to represent a comprehensive redevelopment of the site and to ensure that the both proposals are mutually compatible. This includes, the continuation of the proposed building edge along Britten Street and continuation of the ‘sister block’ along Dovehouse Green. This approach allows for the creation of a large internal garden, providing a substantial portion of open space along the eastern boundary. In addition to providing a coherent and comprehensive approach to massing, height and design within the urban block, the layout will ensure that amenity impacts such as daylight and sunlight, privacy and overlooking, and sense of enclosure are minimised between the two sites. There are no windows proposed directly along the boundary.

**Landscaping**

6.64. The proposed development involves the comprehensive redevelopment of the site including landscaping. Landscaped features will be included along the Dovehouse Street and Britten Street frontages, along the Dovehouse Green boundary of the site and within the central garden space. The vision for the landscaped features is to improve the quality of the site and provide a high quality and sensory environment for residents.

6.65. Policy CR6 states that the Council will require landscape design to be fit for purpose and function, be of high quality and compatible with the surrounding landscape, clearly define public and private space and optimise the benefit to wildlife habitat.
6.66. This planning application is accompanied by a Landscape Report prepared by Randle Siddeley. A summary of the landscape report is provided below:

- The landscape scheme will mitigate the loss of the existing trees on site by provision new planting. 9 trees will be provided along the Britten Street and Dovehouse Street frontages and 10 new trees will be planted in the central garden space.
- Trees and planting with all year round colour will be prioritised to maximise the enjoyment of the site by future occupiers.
- The positioning of landscaping will take into account the need to prioritise legibility and safe access to take account of wheelchair users.
- The landscaping will incorporate areas for residents to rest and make full use of the open spaces on the site.
- The landscaping will be designed with ageing in mind, with a focus on smell, colour and touch.

Trees

6.67. The redevelopment of the site requires the removal of existing trees, predominantly to reinstate a traditional building line along Dovehouse Street and Britten Street.

Existing on-site trees

6.68. The removal of existing trees has been considered within the context of Policy CR6 which sets out that Council will require the protection of existing trees and the provision of new trees that compliment existing or create new, high quality green areas which deliver amenity and biodiversity benefits. The Council will resist the loss of trees unless the tree is dead, dying or dangerous; the tree is causing significant harm to adjacent structures, the tree has little or no amenity value or felling is for reasons of good arboriculture practise. The Council will also resist development which results in the damage or loss of trees of townscape or amenity value. Appropriate replacement of felled trees will be required. Trees should be adequately protected throughout the course of the development. Replacement planting should be compatible in species and size for the surrounding location.

6.69. The site contains 16 existing trees, and 7 Tree Protection Orders (TPO) are identified:

- Catalpa bignoniodies – TPO T1 – has been removed;
- Prunus – TPO T2 – may have been removed (not certain if this tree remains; it may be Tree report T4, but is in a different position than shown on the TPO plan);
- Prunus – TPO T3 / Tree report T1 – in situ.
- Cherry – TPO T1 / Tree report T12 – in situ;
- Cherry – TPO T2 / Tree report T13 – in situ;
- Tree of Heaven – TPO T3 / Tree report T14 – in situ;

6.70. The supporting Arboricultural Report prepared by Dr Frank Hope provides an assessment of the existing trees. The majority of the trees are categorised as poor or low quality. There are only two trees which are considered to be of moderate quality. As such, it is considered that the removal of the existing trees is acceptable in this case, subject to a satisfactory replacement planting regime.
6.71. The proposal provides an opportunity to replace the existing trees of poor and low quality with new trees of high quality. Mitigation planting will be provided to account for the overall loss of trees. The supporting Tree Mitigation Proposal prepared by Randle Siddeley proposes 5 trees along the Britten Street frontage, 2 trees at the entrance of the facility (planter boxes) and 2 trees on the corner of Dovehouse Green and Dovehouse Street. All mitigated trees with the exception of those located at the entrance of the building will be in soil with a depth of approximately 1m. The replacement of 7 TPO trees in poor or low quality health, with 8 new trees along Dovehouse Street and Britten Street is considered to comply with Policy CR6.

6.72. Furthermore, the proposal will also provide deep planting within the central garden space. While this will not be publically visible it will greatly enhance the quality of the garden space, provide screening from the adjoining Chelsea Farmer’s Market site and contribute to the biodiversity value of the site. 10 new trees are to be planted within the central garden space.

Dovehouse Green

6.73. There are three, large, fully mature London Plane trees located within the square (Dovehouse Green) to the south of the site. These trees are not protected by a TPO, but are protected by virtue of being located within the Conservation Area, and are considered to be of a high quality. The supporting tree report provides an assessment of the proposal’s potential impact on these trees. Section 19.5 of the Report concludes ‘The three London Plane trees located in the park, to the south of the existing building, will not be harmed in any way, and they can be left in situ with no minor pruning required only.’ The tree report considers both the impact of the proposal on the root protection zone and the canopy zone of the plane trees and considers that planning conditions could appropriately protect these trees during construction.

6.74. These proposals follow the LPA’s pre-application 1 advice that the removal of the existing trees (including those subject to TPOs) was acceptable due to their cumulatively low value.

Highways and transport

6.75. The proposal has regard to the LPA’s policies relating to highways and transport including Policy CT1 which states that the Council will require that developments do not result in any material increase in traffic congestion or on-street parking pressure.

Access

6.76. There will be two main access points to the proposed building:

- Drop off zone along Dovehouse Street – all residents and visitors will access the building from this point. The drop off zone will accommodate passenger vehicles and taxis. This will lead directly to the main reception area.
- Service zone on Britten Street – this zone will comprise a vehicle entrance, service access, gas meter and substation access, bike, mobility scooter storage and staff access point.

Vehicle parking
6.77. Resident parking will be provided at basement level, accessed via a car lift and stored in a car stacker. Residents will not be required to operate the car lift or car stacker as a valet service will be provided 24 hours, 7 days a week.

6.78. In terms of parking, the Council’s OPHDG provides vehicle parking standards for Class C2 use – essential needs only. RBKC’s 2015 Draft Transport and Streets SPD also states that car parking within Class C2 use should be restricted to ‘essential need’ only. Essential need is defined as:

- Servicing vehicles essential for a site to function in its designated role, including both goods and non-goods vehicles, depending on the land use;
- Site-based delivery and service vehicles;
- Car parking facilities for those with Blue or Purple Badges who cannot realistically use alternative (public) forms of transport, generally those with special mobility needs.

6.79. The scheme provides 18 vehicle parking spaces at basement level, accessed off Britten Street via a car lift, car turntable and stored using an automated stacking system. This equates to 0.32 vehicle parking spaces for each unit. 18 vehicle parking spaces are being provided to cater for households which comprise couples where one person is still able to drive. The parking provision has been significantly reduced since the first pre-application submission and the LPA’s pre-application advice note confirms that this provision is acceptable.

**Cycle parking and mobility scooter storage**

6.80. The Council’s OPHDG considers that cycle parking should be provided at a rate of 1 space per 20 residents and 1 space per 5 staff.

6.81. The extra care facility has the capacity to accommodate up to 110 residents (although it is not expected that each household will comprise two people) and it is expected that a maximum of 45 staff members would be on site at any one time. This would require 6 cycle parking spaces for residents and 9 cycle parking spaces for staff (total 15 spaces). 10 cycle parking spaces are provided at ground floor level accessed off Britten Street. This is an appropriate provision considering the type of residents which are likely to occupy the property and on the basis that each unit is unlikely to accommodate two people.

6.82. The cycle storage space at ground floor level will be shared by mobility scooter storage space. Space for the storage of four mobility scooters will be provided.

**Deliveries and servicing**

6.83. Policy CR7 sets out the Council’s requirements for servicing facilities, stipulating that these should be well designed, built to accommodate the demands of new development and sensitively integrated in any new development.

6.84. Deliveries and servicing will take place via the vehicle and pedestrian entrances off Britten Street. Two service vehicle bays will be provided to the rear of the car lift providing space for vehicles such as small transit vans, ambulances and hearses.
6.85. While it is noted that the preference of policy CR7 is for on-site servicing, any such provision would represent an inefficient use of space within the building and would prove unnecessary given the small amount of servicing trips expected by the development. Clause (d) of policy CR7 permits off-site servicing where it can be demonstrated the proposal will not give rise to adverse transport effects.

Trip generation

6.86. The proposed development has been assessed in terms of trip generation and it is forecast that a minimal net increase in AM and PM two-way trips will be experienced when compared to the previous site use. This is forecast to be a net increase of 3 and 4 total person two-way trips in the AM and PM peak hours respectively. Minimal increases in two way trips on public transport are also forecast.

6.87. This planning application is supported by a Transport assessment prepared by WSP Parsons Brinckerhoff which confirms how the proposed development complies with planning policy relating to highways and transport matters including parking and trip generation. The planning application is also supported by a draft Travel Plan prepared by WSP Parsons Brinckerhoff.

6.88. A Delivery and Servicing Management Plan also prepared by WSP Parsons Brinckerhoff is also accompanying this application.

Waste management

6.89. A refuse and recycle storage area has been provided at ground floor level accessed via the service access on Britten Street. All resident waste will be collected by facilities staff and stored in this area, along with waste generated from communal and service areas. Collection of refuse and recycling will take place on-street and it is estimated that collection will take place twice weekly. Consideration has been given to waste generated from nursing and healthcare services.

6.90. A Waste management strategy prepared by WSP Parsons Brinckerhoff is being submitted with this planning application. This strategy sets out how the proposal accords with the LPA’s waste management policies.

Energy and sustainability

6.91. Policy CE1 sets out the Council’s commitments to reduce carbon dioxide emissions. To achieve this new non-residential buildings 800 sqm or more should be rated BREEAM very good, with 60% of unweighted credits available in energy, water and materials sections.

6.92. An Energy strategy and Sustainability statement prepared by Watermans are being submitted with this planning application. This strategy sets out how the proposal accords with relevant planning policy.

6.93. A summary of the key details as set out in the Energy strategy and Sustainability statement are set out below.

Energy strategy
Planning statement
2 Dovehouse Street, London, SW3 6LA

- The overall site CO2 emissions after the incorporation of energy efficiency measures are 2% lower than a Part L 2013 compliant development.
- “Be Clean” measures include the link to site wide combined heat and power (CHP) unit.
- “Be Green” measures include PV array (approx. 21kWp) located on the roof.
- The energy strategy has addressed the key elements of RBKC’s Local Plan and London Plan Policy on energy and will make a positive contribution to reducing the Boroughs CO2 emissions.

Sustainability strategy

- The Proposed Development will be designed to achieve a BREEAM Very Good under BREEAM UK New Construction 2014 Multi-Residential Care Homes scheme.
- The overall site total predicted reduction in CO2 emissions from the Baseline development model (which is Part L 2013 compliant) is approximately 36% which represents an annual saving of approximately 115 tonnes of CO2.
- The development will comprise water saving measures including efficient water installations. The water consumption for each of the dwellings will be in line with Part G of the Building Regulations and also water consumption criteria under BREEAM 2014 Multi-residential.
- Materials used in the development will be responsibly and sustainably sourced and recycled where feasible, and will be chosen with focus on achieving a low overall environmental impact.
- A construction waste management strategy will be implemented in order to limit construction waste sent to landfill.
- The development has a high level of accessibility via public transport and cycle routes which will assist in reducing reliance on private vehicles.
- A flood risk management will be implemented to prevent water pollution and overburdening of drainage systems in accordance to relevant planning policy and technical guidance document, such as Core Strategy Policy DMS5.
- The main contractor will conform to the Considerate Contractors Scheme and target a score of no less than 35 with a score of at least 7 in each of the five sections.
- The project will adhere to the principles of Secured by Design.
- The development will provide internal and external dedicated storage facilities for the building operational related recyclable waste streams, so that waste is diverted from landfill and incineration.
- The development will improve site ecological biodiversity.
- External light pollution mitigation will be addressed on this development.

Environmental quality

Air quality

6.94. Policy CE5 sets out how the Council will control the impact of development on air quality, requiring, in part, an air quality assessment (AQ) for all major developments. Policy CE5 requires that development must not materially increase exceedence levels of local air pollutants, and must control any further emissions of particles and mono-nitrogen oxides.
Planning statement
2 Dovehouse Street, London, SW3 6LA

6.95. An Air quality statement prepared by MLM is being submitted with this planning application. This strategy sets out how the proposal accords with relevant planning policy.

Noise

6.96. Policy CE6 sets out how the Council will control the impact of noise and vibration generating sources and development that fails to meet adopted local noise and vibration standards will be resisted.

6.97. A Noise report prepared by Waterman is being submitted with this planning application. This strategy sets out how the proposal accords with relevant planning policy.

Flood risk and surface water drainage

6.98. Policy CE2 provides the Council’s requirements to adapt to fluvial flooding and mitigate the effects of surface water and sewerage flooding. In relation to flooding clauses (a), (b), (c) and (d) of policy CE2 apply where development would be located in a flood risk zone 2 or 3. Clause (e) of policy CE2 requires sustainable urban drainage measures to reduce both the volume and speed of run-off to the drainage ensuring the surface water run-off ins managed as close to is source as possible.

6.99. A Drainage Management Plan prepared by Waterman is being submitted with this planning application. This strategy sets out how the proposal accords with relevant planning policy.
7. Conclusions

7.1. This statement has set out a case for the redevelopment of 2 Dovehouse Street to provide an extra care facility (Class C2) comprising 55 units, communal and wellbeing facilities, back of house and service areas, car and cycle parking, landscaping and plant. The statement sets out how the proposal has evolved in response to pre-application advice given by the LPA over a period of nine months.

7.2. This statement finds that the proposed development will deliver a considerable planning benefit in that 55 new extra care units will be provided in the south of the Borough which is directly in line with Policy CH2 which states: Extra care housing will be provided, particularly in the south of the Borough. The proposed extra care facility will provide the opportunity for residents (aged 65 and over) to live independently while having the comfort of on-site care 24 hours a day, 7 days a week. The care provider, Draycott Nursing and Care, has the capacity to provide care for a range of residents including end of life care.

7.3. The benefits of extra care housing for elderly residents have also been explored throughout this statement:

- Care can be delivered at a lower cost than retirement homes – as required by residents rather than a set amount.
- The intensity of care can be adjusted according to specific needs – provides flexibility, care changes as per the individual/households needs change.
- Individuals/households can remain in their homes – can accommodate a wide range of needs including end of life care.
- Older people can live independently but as part of a community.
- Couples do not need to be separated.

7.4. The proposed extra care facility will also result in benefits for the wider community and Borough:

- Individuals/households moving to extra care housing can free up larger dwellings for use by families – there is the potential for up to 55 dwellings to be made available in the Borough.
- Care provided within an extra care development can provide reductions in hospital visits and dependency on the National Health Service (NHS).

7.5. In addition to these benefits, the proposal also brings forward a number of economic and environmental benefits which should be weighed in the planning balance:

- The proposal will bring an unused and underutilised site back into occupation and will repair the townscape which is currently fragmented by the 1970’s building.
The proposed building will be sustainable and energy efficient. The proposal will link to a site wide combined heat and power unit and will comprise PV panels on the roof. The proposed development will be designed to achieve a BREEAM Very Good rating and the total site reduction in CO2 emissions is approximately 36%. The proposed building will comprise water saving measures and materials will be responsibly and sustainably sourced.

The proposed development will result in biodiversity enhancements with the planting of 18 new trees and a comprehensive landscaping scheme.

The proposal is estimated to generate 204 construction jobs per year, with 136 of these being direct construction jobs. This is equivalent to 408 jobs over the 2 year construction phase, with 272 direct construction jobs during this time.

The proposal is estimated to generate 63 jobs during the operational phase of the development, with one of these being direct operational jobs.

The proposed development is estimated to generate a total GVA of £2.5 million to the economy and £2 million in local spend.

The proposed development is estimated to generate CIL charges of approximately £3.4 million could be leveraged from the development by RBKC.

The proposed development is estimated to generate Council tax of £114,000 p.a., business rates of £516,000 p.a. and New Homes Bonus of £688,000 (over six years) could be leveraged from the development by RBKC.

In conclusion, we believe that this proposal presents a very rare opportunity to provide Class C2 use in the south of the Borough. Particularly, where land values are very high in this part of the Borough. In our view, it is important to make efficient and effective use of this site and this proposal will achieve a well considered development which delivers the Borough considerable development. On balance, we believe that the proposal accords with the LPA’s development plan.
8. Appendix
Planning and Borough Development
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Executive Director Planning and Borough Development
Graham Stallwood

Ms A Squires
Savills
33 Margaret Street
London
W1G 0JD

My Ref PRE/AR/16/00420/LEV 3

Please ask for: Mrs. C. Shearing, Senior Planning Officer
Service Standard: 01/06/2016
Date: 01/06/2016

TOWN AND COUNTRY PLANNING ACT 1990

Dear Ms Squires

Address: Thamesbrook Residential Home, 2 Dovehouse Street, LONDON, SW3 6LA
Proposal: Redevelopment of site including demolition of buildings and provision of extra care facility providing 56 units and a range of communal and wellbeing facilities and service functions comprising ground and four floor levels and part fifth floor level, lower ground floor and basement.

Attached is my Level 3 advice on your proposal. The levels of advice we provide are explained in our guide Getting advice before making an application, which can be viewed on our website at: http://www.rbkc.gov.uk/advice

If you would like further advice to develop your proposal, Getting advice before making an application also explains how you can ask as to advise further.

Yours sincerely

Claire Shearing

Claire Shearing
Senior Planning Officer Strategic Sites

Email: Planning@rbkc.gov.uk
Web: www.rbkc.gov.uk/planning
Thamesbrook Residential Home, 2 Dovehouse Street, LONDON, SW3 6LA

Advice report for redevelopment of site including demolition of buildings and provision of extra care facility providing 56 units and a range of communal and wellbeing facilities and service functions comprising ground and four floor levels and part fifth floor level, lower ground floor and basement.

Our reference: /AR/16/00420
Date: 31/05/2016

1.0 Summary
1.1 In summary and following our meeting on 18th May 2016, I advise:

i. Based on the information provided to date, Officers are minded to agree that the use class of the proposed development is C2. However further information is required regarding the level of care and how this will be secured in perpetuity.

ii. The height and resulting scale and massing of the block is excessive and a storey needs to be removed throughout the development.

iii. The site is not a ‘large site’ for the benefit of policy CL7 and the extent of basement excavation is not acceptable.

iv. The proposed provision of 36 car parking spaces is excessive and is not supported.

1.2 For these reasons I would support the proposal subject to substantial changes if an application were made. Whilst the advice is given in good faith, it is based on the information provided and does not bind the Council to a particular decision.

1.3 The advice in this report is provided at Level 3 as described in our customer guide, which can be viewed at: www.rbkc.gov.uk/advice. Should you require further advice I would welcome the opportunity to be of further assistance. The guide also explains how we can provide this to you. If you refer to our advice in public consultation events or marketing please ensure that you accurately reflect the full extent of the advice provided.

1.4 Should you decide to make an application following this advice then the easiest way to do so is electronically by registering on the Planning Portal at: http://www.planningportal.gov.uk/PpApplications/loginRegister.jsp

1.5 Any application will need to be accompanied by appropriate information before it will be registered and considered. If any information requirements are missing, we cannot consider your application until it is provided. Section 6 summarises the information necessary to register an application for this proposal and if you are in any doubt please view the requirements on our website at www.rbkc.gov.uk/checklist before you submit the application.
2.0 Relevant planning history

There is no planning history of direct relevance to these proposals.

3.0 Main relevant strategies and policies

The Development Plan

3.1 The main planning considerations applying to the site and the associated policies are:

<table>
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<tr>
<th>Category</th>
<th>Consolidated Local Plan</th>
<th>London Plan</th>
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<tbody>
<tr>
<td>Land Uses and Housing</td>
<td>CH1, CH2, CH3</td>
<td>3.5, 3.8, 3.14</td>
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<td>Transport</td>
<td>CT1, CR7</td>
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<td>CL3, CL4, CL11</td>
<td>7.8, 7.9</td>
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<td>Living Conditions</td>
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<td>Sustainability, flooding and climate change</td>
<td>CE1, CE2, CE3, CE4, CE5</td>
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</tr>
<tr>
<td>Contaminated land</td>
<td>CE7</td>
<td>5.21</td>
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These documents can be found at:

- London Plan: [http://www.london.gov.uk/priorities/planning/london-plan](http://www.london.gov.uk/priorities/planning/london-plan)

3.2 Supplementary planning documents adopted by the Council relevant to the proposal are:

- Chelsea Park/ Carlyle Conservation Area Proposal Statement
- Basements
- Transport and Streets
- Planning Obligations
- Trees and Development
- Access
- Noise
- Air Quality
- Building Height

More information on these documents can be found at: [http://www.rbkc.gov.uk/planningandconservation/planningpolicy/supplementaryplanning.aspx](http://www.rbkc.gov.uk/planningandconservation/planningpolicy/supplementaryplanning.aspx)
Other Local Strategies or Publications

3.3 Other local strategies or publications relevant to the proposal are:


4.0 Explanation

4.1 The key issues are discussed in turn below.

Land Use

4.2 Policy CK1 of the Local Plan seeks to protect social and community uses throughout the Borough. The definition of social and community uses in paragraph 30.3.4 of the Local Plan includes care homes, care facilities and elderly people’s homes. The principle of a replacement care home or elderly people’s home on this site is therefore acceptable under policy CK1.

4.3 Paragraph 1.2.53 of the GLA’s Housing SPD 2016 acknowledges that self-contained housing for older people will have an important role to play in meeting London’s need, particularly that for private and intermediate sale. It acknowledges that sites within or on the edge of town centres with good accessibility to public transport are likely to be suitable for this form of provision. The provision of extra care housing on this site complies with policies 3.8 of the London Plan.

4.4 The GLA’s Housing SPD, page 112 onwards, describes those extra care facilities that would fall within a C2 and a C3 use class. If the development is to fall within the C2 use class it should be explicit that the level of care that would be secured would fall within the definitions for C2 provided on pages 112 and 113. At this stage, based on the information provided, the development appears to incorporate aspects of each use class. Its C3 characteristics include the self contained units (each unit has its own front door) and self catering facilities. However other shared facilities demonstrate C2 characteristics, including a well defined element of ‘care’ and access to 24 hour care registered with the Care Quality Commission.

4.5 The Consolidated Local Plan glossary defines extra care housing as: ‘an alternative to residential care, helping older people to live as independently as possible and offering self-contained accommodation in a choice of tenures with access to a wide range of 24 hour care on site. Schemes may also provide communal areas, hairdressing and laundry facilities, hobby rooms and a shop’. The London Plan glossary definition of extra care also includes references to self contained accommodation with 24 hour support.

4.6 Based on an initial review of the information provided to date it would appear that the accommodation would constitute extra care within the C2 use class. However, further information should be provided to clarify how the proposals adhere to the C2 use class definitions given in the Housing SPD. In particular, the submitted Planning Statement states that residents will be subject to an initial needs test and a minimum of 2 hours of care per day will be required in order for potential occupiers to be eligible. Despite this it is not clear what constitutes the 2 hour minimum, for example if this includes just medical needs or laundry services. A draft operational policy should be provided and details should be provided of how the use would be secured by a section 106 agreement.
Mix and Quality of Accommodation

4.7 The proposed mix comprises 18 x 1 beds, 22 x 2 beds and 16 x 2+ beds. The Council’s Strategic Housing Market Assessment (SHMA) December 2015 identifies a growing elderly population and estimates that about 87 to 100 units per annum are needed to meet the demand for specialist housing for older people. It also indicates that over 65s living in the owner-occupied sector having considerable scope for downsizing, as three-quarters under occupy their homes, half of these by two bedrooms or more. There is minimal indication of overcrowding. Whilst the SHMA does not indicate whether the demand is for 2 bedroom or 3 bedroom homes, it is considered that a large proportion of 3 bedroom units as proposed would not be suitable to maximise the opportunities available to downsize or to provide a greater number of units. This unit mix therefore needs further consideration.

4.8 The information provided suggests that all units achieve the minimum floorspace standards laid out for self contained accommodation in the London Plan. However, achieving these floorspace standards suggests that residents have the space and facilities within their units to be entirely self contained, reflecting a use more akin to C3.

4.9 The floor plans provided to date do not demonstrate window locations. However the development appears to incorporate a number of north facing single aspect units in the south eastern corner of the building. These should be revisited.

4.10 Arrangements for access to outdoor space should be clarified. The sunken rear garden is unlikely to receive a significant amount of day lighting and is unlikely to provide high quality outdoor space. An overshadowing report should be provided to clarify the quality of this garden if this is only outdoor space forming part of the proposals.

Design and Impact Townscape

Height and Massing

4.11 The site is located as a transition point and has a number of different townscapes to be response to in terms of urban grain, character, functionality, materiality and architectural style. To the eastern side of the site the emerging Brompton Hospital scheme includes 4 +1 storeys on Britten Street and a potential development within the existing hospital car park which will have institutional functions and be of a civic scale. However, on Dovehouse Street, the scale of buildings including the former Nurses Home, have a more domestic scale. The western side of Dovehouse Street is distinctly domestic and low density and in parts only 2 storeys. The properties on the western side of Dovehouse Street are modes and quiet in character. The more recent development to the south has increased in scale to the central part of the site where it steps up to respond to the scale of Manresa Road. However directly adjacent to Dovehouse Street the development is only a modest 3 storeys comprising 2 storeys of brick and a more recessive traditional roof form.

4.12 For the redevelopment of Thamesbrook House to contribute positively to the place shaping of this area it should respond to existing and emerging townscapes and straddle these different townscapes which it adjoins without becoming too contrived. The development proposes G+ 4 storeys across most of the site and G+6 storeys at its southern end adjacent to Dovehouse Green. No sections demonstrate floor to ceiling height have been provided and the total height is not clear. However, in this prominent corner location the scale and massing of the development would appear incongruous and fail to respond to local context. The height and resulting scale and massing of the block is excessive and a storey needs to be removed throughout the development. The development should comprise 3+ 1 recessive storey on Dovehouse Street and 4 +1 recessive storey on Dovehouse Green. This is
consistent with earlier pre application advice given on this site.

4.13 It is recognised that there should be a transition in building heights along Britten Street where height lowers from east to west.

Site Layout

4.14 The reinstatement of a historic building line on Britten Street and Dovehouse Street is welcome. However the off-street drop off/pick up space does weaken this benefit and gives an institutional appearance and compromises the overall design with centrally positioned double height void. The development site is set within the more residential and domestic part of Dovehouse Street, rather than the hospital campus and the building line and point of entry should be responsive to this. The drop off area appears visually prominent and dilutes the quality of the scheme.

4.15 The ground floor colonnade appears overly deep. Its purpose would be to provide privacy to ground floor rooms, however there is only one residential unit at this level and the ‘manager office’ and ‘library/cafe’ do not require this degree of privacy. Furthermore, the street does not experience high footfall. Therefore the purpose of the colonnade is questioned.

Design Quality

4.16 The emerging architecture in terms of facade composition and materiality is positive and should be developed further in accordance with the amendments to height and massing discussed above. The ground floor should have an active presence in the street and the colonnade is unwelcome as discussed above.

4.17 There are currently no details of the rear elevations, gardens and open spaces. The basic design principles of ‘bottom, middle and top’ are welcome and reflect traditional facade hierarchies in the Borough. The masonry finish and how this relates to the local palette of materials both in terms of existing and emerging requires further consideration.

4.18 The car lift entrance on Britten Street is likely to be directly adjacent to a car lift entrance on the adjacent site. This is unwelcome and would create a large expanse of dead frontage at ground floor level.

4.19 The permeability of the site should be considered, in particular the ability to include a new pedestrian link from Dovehouse Street to Sydney Street. The treatment of the ground floor southern elevation, trees and landscaping need to be carefully considered. Opportunities should be explored for activation of this ground floor frontage to improve connectivity with Dovehouse Green.

Basement Development

4.20 Based on the information provided Officers maintain that this is not a ‘large site’ as defined by the Consolidated Local Plan for the benefit of policy CL7. The site is not in a commercial setting and does not comprise all or a substantial part of an urban block.

4.21 A brief construction method statement is provided at the back of the Structural Methodology Statement. This details that the basement would be constructed in two halves using 3 site entrances to maintain a vehicle entrance onto the site at all times. It also states that a turning circle will be provided on the site so vehicles can enter and exit the site in a forward gear. Officers question whether the site is of a size that could accommodate these movements as described and the information provided has not convinced Officers that this is a site which could satisfactorily accommodate all plant and vehicles (as well as other required facilities including site offices and welfare) on the site.
4.22 Regardless of whether the site could reasonably accommodate all plant and vehicles arising from the basement excavation, the site remains in close proximity to residential accommodation and sensitive uses of the hospital on Dovehouse Street. In order to comply with policy CL7 only a single storey of basement would be acceptable.

4.23 Early discussion with Crossrail, evidenced within the documentation submitted, is welcome.

4.24 In order to comply with other parts of policy CL7, an acceptable draft Construction Traffic Management Plan (discussed further below) and Construction Method Statement which adheres to the requirements of the Basement SPD would be required with the planning application. In the absence of sections it is unclear if appropriate top soil is provided to the rear garden. SUDs would also be required.

**Impact on Traffic and Parking**

4.25 A transport scoping note has been prepared by WSP which sets out the details of the development as currently proposed as well as the proposed scope of assessment to be undertaken. The document is largely acceptable but the following comments should be addressed in a future submission:

**Section 2-**
Policy reference should be updated to reflect the adoption of the Transport and Streets SPD in 2016. The 2008 SPD should not be referenced.

**Section 3-**
The reference to a Crossrail 2 station in Chelsea is reasonable but this should be referred to as ‘currently proposed. No significant weight should be given to Crossrail 2 in the transport assessment.

**Section 4-**
Reference should be made to the fact that Dovehouse Street is a designated cycle Quietway and changes to its junction with Britten Street have recently been made to prioritise cycle movements.

The accuracy of figure 4.1 is queried as there are not publicly accessible off-street car parks in all the locations indicated.

**Section 5-**
The provision of an off-street drop-off facility is considered to be a reasonable proposal in terms of the function of the highway given the nature of the facility proposed. It must however not prejudice the safe movement of pedestrians along the footway, must be of adequate dimensions such that it is fit for purpose and be managed in an effective manner to prevent its use for anything other than drop-off and pick-up.

Reference is made in 5.2.3 and 5.4.1 to an internal service yard accessed via Britten Street but it is not clear on the plans where this is. The provision of an adequate off-street servicing facility is required in order to satisfy policy CR7.

The proposed provision of 36 car parking spaces is considered to be excessive and based on the information provided is not supported. The Transport and Streets SPD sets out the Council’s parking standards and for C2 uses allows for the provision of parking for essential need only. Essential need does include parking for Blue Badge holders but the applicant would need to provide robust evidence to demonstrate that 64% of units would likely to be occupied by car owning residents eligible for a Blue Badge. It would also need to be shown that use of a car lift and stacker arrangement is suitable for use by disabled persons as would be the case here. The only reason
that any off-street car parking would be allowed as part of this development is to meet the needs of Blue Badge holders so the parking arrangement should be designed accordingly.

It seems that the surveyed care home in Hounslow has a significantly higher proportionate provision of car parking per resident than the now closed Thamesbrook care home had and as such the number of vehicle movements that would have been generated by the former use of this site and as set out in Table 6-3 are considered to be an over estimate. It therefore follows that the forecast net change in vehicle movements set out in Table 6-5 is also not considered to be accurate with the uplift in vehicle movements likely to be greater than forecast.

The forecast occupancy rates per unit type are noted but officers do not have the necessary information to determine whether the proposed figures are reasonable or not. Information from the site outside RBKC referred to in 5.3.3 is requested to help officers to make this judgement.

In 5.3.4 reference is made to 88 residents being generated by a total of 66 proposed units on the site. These figures do not tally with reference elsewhere in the document to there being a total of 56 units proposed, which using the suggested occupancy figures from paragraph 5.3.2 would suggest that there would be 73 not 88 residents. Clarity on this point is essential as it relates to other elements of the assessment including the proportionate number of car parking spaces to residents in comparison to the site surveyed in Hounslow where the 17 parking spaces for 59 residents equates to 0.3 spaces per resident whereas 36 spaces for 73 residents as seems to be proposed here equates to 0.5 spaces per resident. This being the case the forecast trip rate would need to be adjusted to reflect this.

The number of forecast taxi movements is considered to be extremely low with only six taxi movements forecast across the entire day. It is also not clear whether trips by staff members have been factored in to the assessment. Overall there is concern that the current assessment does not provide a robust forecast on the number of vehicle movements that would be generated by the proposed development.

**Cycle Parking**

4.26 There is a requirement for the provision of bicycle parking both for staff and residents. Discussions can be had over the exact number required in respect of residents but all such bicycle parking will need to be extremely easy to access and the use of double stacked or vertical/semi-vertical storage is unwelcome.

**Footways**

4.27 Any redundant vehicle accesses must be removed with the footway reinstated in Yorkstone to match the existing footways. The work would be undertaken by the Council’s contractors at the applicant’s expense.

**Construction**

4.28 In addition to comments above in respect of the basement excavation, in order to accord with CL7(k) the applicant will need to demonstrate that the basement construction works would not have any unacceptable impact upon the highway or the site’s neighbours. The application would need to be supported by a draft CTMP prepared using the RBKC CTMP pro-forma. Although this is a draft document it should be written as though it is the final version with specific and clear commitments on how the works would be undertaken. Indeterminate language such as “approximately”, “estimated” and “likely” etc should be avoided. If exact details are not known then a robust worst case should be adopted. It is expected that a development will adopt a methodology suitable for its surroundings and at an early stage actively engage with neighbours and other key stakeholders in formulating the
Impact on Existing Properties

4.29 In addition to the impact of the basement excavation discussed above, the development would be likely to impact upon the provision of sunlight and daylight of the opposite properties on Dovehouse Street. A sunlight and daylight report, prepared in accordance with BRE guidance should be provided. Officers shall also assess the impact on privacy and sense of enclosure once the massing and elevations are developed.

Impact on Trees

4.30 The proposals entail the removal of all existing trees on the site. The cumulative loss of tree cover is significant and would be noticeable along Dovehouse Street and Britten Street. Given that most of these trees are not individually of high value, including the cherry with a TPO, their removal is acceptable. However, some replacement planting to mitigate for their loss would be expected.

4.31 The proposal does not include any replacement, or mitigation, planting and the new garden area would have potential for planting subject to soil depth. However any new trees in the garden area would be behind the building lines and make a far lesser contribution to the public realm than the existing trees. The proposals conflict with policy CR6.

4.32 As the new garden at the back of the site is only area available for any mitigation for the loss of existing trees, the proposals should include high quality opportunities for new planting. A minimum 1m of soil depth would be required and, given the reliance on this new planting, should include a drainage layer, subsoil and a layer of topsoil to 40cm depth to enable new tree growth. The topsoil should meet the BS3882 standard for multipurpose topsoil.

4.33 The proposal is considerate of the plane trees to the south by retaining a similar building line to the existing at the site’s southern end.

Sustainability and Environmental Issues

4.34 The development should be capable of achieving Level 4 of the Code for Sustainable Homes equivalent in relation to energy performance and shall achieve compliance with the optional requirement (G2(2)(b) in respect of water efficiency in order to achieve compliance with policy CE1. The development should also demonstrate compliance with London Plan policies that will be relevant at the time of the decision.

Other Material Considerations

4.35 Were the development permitted and built the landowner may be liable to pay the Mayor of London's and the Borough's Community Infrastructure Levy (CIL) to contribute towards infrastructure. Existing and proposed floorspace figures should be provided to allow Officers to clarify the extent of the CIL payments. CIL liability is not fully confirmed until planning permission is granted when a CIL Liability Notice is served, and then when development commences when a CIL Demand Notice is served. More information about CIL can be found at: www.rbkc.gov.uk/cil

4.36 The site is located within charging zone B where Borough CIL charges for residential are £590 per square metre and £230 per square metre for extra care housing. It is understood that the existing building has been empty well in excess of 6 months and this would result in all floorspace being CIL liable.
5.0 Consultations I recommend you carry out

5.1 I encourage you to discuss your proposals with all neighbours with a boundary with your site, as we will advise them of any application. You may be able to deal with any concerns they may have before making the application and therefore avoid objections being submitted by them.

6.0 Information to accompany your application

6.1 The easiest way to apply is electronically by registering on the Planning Portal at: http://www.planningportal.gov.uk/PpApplications/loginRegister.jsp. Any application will need to be accompanied by the following information before it will be registered and considered. If you submit your application on paper rather than electronically we will need two sets of all information.

- Application form listed below (available at http://www.rbkc.gov.uk/planningandbuildingcontrol/planningapplications/guidanceandadvice/howtomakeanapplication/applicationforms.aspx) with all sections completed, signed and dated:
  - Full planning permission application form
- The correct fee. You can calculate your fee by using the Planning Portal: http://www.planningportal.gov.uk/PpApplications/genpub/en/StandaloneFeeCalculator. Alternatively, please telephone PlanningLine for assistance on 020 7361 3012. If you would like to pay by credit or debit card tell us who to call to take payment. Please make all cheques payable to 'Royal Borough of Kensington and Chelsea' and write the site address clearly on the reverse.
- Location Plan - based upon up-to-date map and ideally at scale of 1:1250, with the site boundary identified in red, and a blue line drawn around any adjacent land owned by the applicant.
- Site Plan - clearly indicating north, at a scale of 1:200 or 1:500, showing footprints of all buildings existing on site in relation to site boundaries and neighbouring buildings.
- All relevant existing and proposed floorplans, elevations and sections to a scale of 1:50 or 1:100. All plans should include the paper size, scale and a scale bar.
- All relevant existing floorplans, elevations and sections to a scale of 1:50 or 1:100 indicating all parts of the building to be demolished. All plans should include the paper size, scale and a scale bar.
- Design and access statement
- Photographs of the site
- Acoustic report
- Air Quality Assessment
- Existing Tree Survey and Arboricultural Report
- Planning statement
- Transport statement
- Construction method statement
- Draft Construction Traffic Management Plan
- Demolition Environmental Management Plan
- Code for Sustainable Homes pre-assessment (as detailed above)
- Land Contamination Desk Study
- Completed CIL Form
- Completed CIL Calculator
- Completed S106 obligations calculator
- Tree report/survey
- Evidence as to how you comply with Policy CE2(e) which requires sustainable urban drainage (SUDS), or other measures, to reduce both the volume and speed of water run-off to the drainage system. You are encouraged to use the Council's SUDS tool at: http://www.rbkc.gov.uk/planningandbuildingcontrol/planningpolicy/flooding/policyce2flooding.aspx
6.2 If any of these requirements are missing, we cannot consider your application until it is provided. If you are in any doubt please take time to view the requirements at our website at:
http://www.rbkc.gov.uk/planningandbuildingcontrol/planningapplications/guidanceandadvice/howtomakeanapplication/submittinganapplication.aspx before you submit the application.
# Royal Borough of Kensington and Chelsea

## Pre Application Advice Note 2

<table>
<thead>
<tr>
<th>Project:</th>
<th>Thamesbrook, 2 Dovehouse Street</th>
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<tr>
<td>Date of issue:</td>
<td>19/12/2016</td>
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<tr>
<td>Meeting date:</td>
<td>22/11/2016 &amp; 12/12/2016</td>
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### Relevant Documents:
- Pre-Application 03 prepared by PDP (November 2016);
- Pre-application statement prepared by Savills (November 2016);
- Candidate Study prepared by Cityscape (November 2016);
- site model
- Transport Note prepared by WSP (October 2016);
- Transport Scoping Report prepared by WSP (November 2016);
- Construction Management Plan prepared by KnightBuild (Rev 03, November 2016);
- Draft CTMP prepared by KnightBuild (Rev 03, November 2016);
- Landscape Design Proposal prepared by Randle Siddeley Associates (September 2016);
- Arboricultural Impact Assessment prepared by Dr. Frank Hope
- Pre-application 04 prepared by PDP (December 2016).
- CTMP routing drawings: VSP-KB-KEN-2 DOVEHOUSE STREET-2016-001, 002, 003 R. 01; TM-KB-KEN-2 DOVEHOUSE STREET-2016-001, 002,003 R. 01.

### Attendees:
- Applicant Team
  - Allison Flight – RBKC Planning
  - Jo Parker – RBKC Urban Design
  - Will Howe – RBKC Transport
  - Josleen Chug – RBKC Planning

## 1.0 INTRODUCTION

### 1.1

This advice note follows the submission of pre-application material for the redevelopment of the Thamesbrook site in November and December 2016.
and the meetings held on the 22/11/16 and 12/12/2016. The meeting follows previous officer advice on the scheme provided at the meeting of 27/09/16 and earlier Level 3 Pre-Application advice under reference AR/16/00420. Since the meetings, officers have reviewed the model of the scheme and the comments below reflect officers’ views having considered the model as well as the latest pre-application document 04 which has further developed the detailed architecture from that in pre-application document 03.

2.0 Design

2.1 The model helpfully assists in providing a more tangible 3D representation of the proposal and importantly how this will fit into the wider emerging urban block within which it would sit. The model reveals a number of fundamental issues around layout, legibility and functionality as well as architecture. The type of use and its functioning does not lend itself easily to this location due to the need for privacy, central controlled access and drop off and pick up points.

2.3 The Dovehouse Street elevation is monotonous and lacks legibility. The drop-off area is at odds with the surrounding context, significantly disrupts the legibility of this elevation due to its cave like appearance and hampers the design and contribution the development could make o the townscape. It is an unwelcome feature in the street scape that dominates the Dovehouse Street frontage failing to provide a suitable contribution to this high quality street scene. It is acknowledged that the operator of the building has specific requirements in relation to drop-off. However, the current format is not acceptable and an alternative approach must be developed to move the proposals forward.

2.4 Drop-off could happen on-street at the kerbside, not from a lay-by or, for emergencies, there is the potential to utilise the existing dropped kerb at the Thamesbrook House service area at the site’s southern boundary. The latter would need to be designed carefully so as to still read as the main pedestrian entrance and not become car dominated or divided into a series of segregated spaces.

2.5 At the meeting on the 12th December an alternative option for the drop-off was discussed. It was suggested by the applicant team that an inset lay-by could be created on Dovehouse Street with an associated recess of the central bay portion of the main building to accommodate this thereby removing the undercroft area at the ground floor of the building. Having considered this option, officers are still of the view that this would have a significant and dominating impact on the façade and the architecture of the Dovehouse Street elevation and is not likely to be suitable. It is recommended that the approach to drop-off does not disrupt the existing kerb line and retains a strong and traditional building line in keeping with the surrounding context.
2.6 Removing the recessed drop-off area would enable a more traditional streetscape. The currently proposed French doors at ground level provide a confusing elevation that is not in keeping with the traditional townscape. Separate entrances should be introduced which would break up the massing and elevation of this substantial block and aid legibility. This would also give residents flexibility around access having both private and a communal entrance. It is acknowledged that given the nature of the use a single controlled access may be preferable. However, this fails to respond to the surrounding context and restricts the detailed architectural treatment to a degree that is not supportable.

2.7 Setting the building line further back on Dovehouse Street is also strongly encouraged and would release some breathing and defensible space for each ground floor unit to have a small entrance with garden. The 3 sheer storeys would sit more comfortably within their context rather than being almost the back edge of footway which adds to this sense of being "over scaled" and overbearing. This would result in a more comfortable transition with the surrounding residential context of Dovehouse Street.

2.8 The layout and design of the building is such that the building fails to respond or interact to the adjoining public space of Dovehouse Green in any meaningful way. The layout and use of the building on this frontage is such that it does not engage with the Green, or provide the level of activity that is needed from such a public façade. The location of class C2 residential units on the ground floor with the associated private fenced off gardens turns a public frontage into a private and inward looking development that undermines legibility and fails to respond to the Green, or the proposals for the emerging retail and commercial activity at the adjoining site.

2.9 The height of the building as it fronts Dovehouse Green is still objectionable as it reinforces the monumentality of the block. Height on a building commands a main entrance and usually emphasises the presence and legibility of a building and its sense of purpose. However, the main entrance is on the quieter residential Dovehouse Street and what is currently proposed is a flank elevation on a primary public frontage. It is strongly recommended that a main pedestrian entrance with presence is introduced to the Dovehouse Green elevation coupled with more active uses at ground floor level. A continuation of the route through to link with the retail square along Dovehouse Green’s northern edge would connect the development to its context is also strongly advised.

2.10 The sister block has a strongly defined commercial base. The generous floor to ceiling height of the ground floor reinforces this and anchors the building. It is strongly advised that a similar device is used on the Dovehouse Green façade of the proposed building coupled with the introduction of more active, transparent and communal uses at ground floor level. This would assist in the legibility of the building and improve its relationship with its context as well as making use of the attractive aspect over the Green.
2.11 | It may be beneficial to the scheme to treat the architecture of the Dovehouse Green block differently appropriate to its changed sense of purpose and status within the development. However not so differently that it is not part of the wider development but with some subtle departures including a raised ground floor this approach could break down the overall form of the block and create a Dovehouse Green rather than Dovehouse Street elevation. This could also improve the currently awkward transition between the 3-6 storey element on the corner of Dovehouse Street. Overall the development needs to get away from slavishly repeating the same module and detail in the round and additional storeys must be recessive and relate better to the facade below.

2.12 | Effectively there are two public frontages and the building must have a positive dialogue with both: Dovehouse Green open space and Dovehouse Street townscape. This large development block with a single recessed entrance and drop off point does not create good urban design. It fails to engage meaningfully with Dovehouse Street and equally turns it back on Dovehouse Green and any potential links with the emerging retail activity and pedestrian space beyond the site. There is no connectivity or integration with wider townscape in the round and this must be addressed to achieve successful place shaping and a successful scheme. The site has many strengths including its historic and emerging context which the development should positively respond to rather than treating this as an insular, anywhere architecture development. The location is an asset which is being side-lined through the current approach.

2.13 | If we are to support the scale as proposed, then the development must give something back to the open space in terms of its relationship to Dovehouse Green and as a development it must become altogether more public, permeable, distinctive and give the building identity within the wider context. In the absence of this legible and engaging relationship with its context, as proposed, the height and massing could not be supported being contrary to CLP policies CL1, CL2 and CL3 and overall is poor place shaping.

2.14 | For this scheme to move forward with the desired scale and height there must be genuine wider benefits to the local and historic townscape so that the scheme creates and enhances the emerging sense of place in this important and special part of Chelsea. There are some real opportunities here which should not be overlooked but this requires a significant step change to layout and access.

3.0 | Architecture

3.1 | With the above changes the architecture would be liberated as the physical appearance of the building would then respond to different functionality. The repetitive modules could be replaced with a more traditional approach to townscape which is typical of the area and so reduce the massing of the
### 3.2

Notwithstanding the significant changes expected to be made in response to the comments above the following points are raised in relation to the updated detailed design treatment provided in pre-application pack 04:

- The simplification of the balcony design is welcomed however the projecting balconies are overbearing and dominant, particularly on the Dovehouse Street façade;
- The proposed high level balconies/roof terraces would add unsightly clutter to the roofs on Dovehouse Street that would be visible in long distance views and should be removed;
- The proportions of the glazing on the top storey facing Dovehouse Green need to be reviewed to achieve a better relationship with the building below in terms of the pattern of the openings, alignment and size. This storey should appear recessive.
- The top storey of the transition element on Britten Street should be set back in line with the rest of the storey and should not be set forward.
- The central element/bay of the façade on Dovehouse Street above the drop-off zone is still awkward in its proportions worsened by the projecting balconies;
- The proposed palette of material with the introduction of stone is an improvement on the previous iteration.

Further detailed comments on the developing facades are not offered at this stage given the changes that are required to the layout and functionality of the building which will somewhat alter and dictate the detailed architectural treatment of the building.

### 4.0 Other Matters

#### 4.1

A selection of views has been provided to consider the impact of the proposal on the townscape and any local heritage assets. However, given the amount of leaf coverage on the trees they are of limited value. The forthcoming application would need to be accompanied by winter views of the proposal so that the true impact of the development can be seen. It is also requested that view 8 (Dovehouse Street) is re-shot from the other side of the pavement as per the location shown on the map.

#### 4.2

It is understood that the owners of the Green wish to carry out some public realm improvements to this space which is yet to be agreed with stakeholders and landowners. As per the comments above there is a requirement to provide a better and more engaging relationship between the development and the Green, as such any enhancements to this space should take advantage of the benefits the site could offer.

#### 4.3

As discussed at the meeting the articulation and rhythm of the facades currently fail to break down the mass of the facades particularly on...
Dovehouse Street elevation due to its unbroken length. Plot widths along all elevations need to be reviewed including the single bay widths on Britten Street. Overall the elevations lack sufficient detailing and modulation to break down their scale.

4.4 The methodology set out in the submitted draft CTMP (Rev 3 Nov 2016) does not take account of the potential closure of Britten Street in order to facilitate the already consented redevelopment of the Royal Brompton Hospital. To safeguard against a scenario where the two developments are implemented concurrently and to demonstrate that this would be feasible the applicant has been advised to submit a supplementary CTMP that sets out the alternative methodology should Britten Street be closed. In addition to this there are also concerns over the potential impact upon the designated Cycle Quietway along Dovehouse Street that could arise from routing to the site along Dovehouse Street from the King’s Road. Offices have advised that alternative routes and access and egress points for the site are explored that avoid the need for construction vehicles to pass through the King’s Road / Dovehouse Street junction.

4.5 Further routing options have since been submitted and for a scenario where Britten Street is not closed Option 2 is the preference over Option 3 as it removes the need for construction vehicles to pass through the constrained King’s Road and Dovehouse Street junction and keeps construction vehicles off the Cycle Quietway that runs along Dovehouse Street. It is however noted that whilst the submitted tracking diagrams for Option 2 show vehicles both entering and exiting the site in a forward gear it doesn’t show where within the site they would be able to undertake the required turn. It is assumed that although this is not shown the applicant has satisfied himself that this manoeuvre is feasible.

4.6 For a scenario where Britten Street is closed in order to facilitate the redevelopment of the Royal Brompton Hospital routing Option 4 is the preference over Option 3 as although it does require construction vehicles to travel along the Cycling Quietway on Dovehouse Street it avoids the need to pass through the most constrained southerly section and the junction with Kings Road. As with the above comments it is noted that whilst the submitted tracking diagrams for Option 4 show vehicles both entering and exiting the site in a forward gear it doesn’t show where within the site they would be able to undertake the required turn. It is assumed that although this is not show the applicant has satisfied himself that this manoeuvre is feasible.

5.0 Next Steps

5.1 The scheme should be amended to take account of the comments above with a particular focus on layout and access and architectural treatment.

5.2 A number of technical documents and draft application documents have been submitted to officers which will be reviewed prior to submission and
| 5.3 | The target submission date for the application is January 2017. Given the number of significant outstanding concerns with the proposals an additional design meeting is recommended prior to submission. |

feedback will be provided in a separate advice note. Draft HOT’s are also requested to be submitted for officers to review prior to submission.
1.0 INTRODUCTION

1.1 This note provides feedback on the draft documents that have been submitted for review prior to formal submission.

2.0 Arboriculture and Landscaping
2.1 The footprint of this building is slightly different to that in the previous proposal. This plan involves the removal of all trees on site. The proposal moves closer to the large London planes to the south of the site on Dovehouse Green.

2.2 While the arboricultural report from Frank Hope dated 19th July 2016 makes a good argument that the encroachment of the building onto the Root Protection Areas (RPAs) of the large London planes will not be significant, the proximity of the building to the crowns of the trees is not considered in the report. Bringing the frontage of the building so close to the crowns of the plane trees will result in significant pressure to reduce the crown size of the plane trees, and so does not create a sustainable relationship between the building and existing tree cover.

2.3 The cumulative loss of tree cover on site is significant, and would be noticeable along Dovehouse Street and Britten Street. Given that most of these trees are not individually of high value, including the cherry with a TPO, we would not prevent them being removed for development. However, we would normally expect sufficient mitigation planting.

2.4 The proposal does offer mitigation planting, including some welcome planting along the Britten Street frontage. The new garden area behind the building has space for tree planting. However, the proposal as it currently stands would still reduce publicly visible tree cover.

2.5 In addition, the planting in the rear garden – and perhaps on the Britten Street frontage, though this is not entirely clear – is proposed to be in raised beds. The rear garden is largely not a green space at all, being hard surfacing with some beds. This is not a high quality replacement for the lost green space, nor is it appropriate for the long term growth of tree cover of any substance. Except where beds can be very large, we would generally advise against planting trees in planters or raised beds. Unless the trees are kept very small – in which case they would be poor replacements for trees being removed - the planters will usually crack over time, resulting in pressure to remove the trees.

2.6 The proposal is therefore contrary to Core Strategy Policy CR6b to: *resist development which results in the damage or loss of trees of townscape or amenity value.*

2.7 The proposal is less likely to see objection if the southern frontage of the building is kept at least 2.5m from the crowns of the London planes – this will require accurate measurement and plotting of the crowns of the planes, which is missing from the current arboricultural report. Objections may also be reduced if the proposed tree planting is in extensive and deep soil, both in the garden and along the Britten Street frontage.

3.0 Drainage

*Flood Risk*
3.1 The site is located in Flood Risk Zone 1 with low risk of fluvial and tidal flooding. It does not fall within a Critical Drainage Area, designated by the Council as such due to the high risk of surface and sewer water flooding in the area. As the site is smaller than 1ha (0.31ha) a Flood Risk Assessment is not required.

3.2 The basement should be protected from sewer flooding through the installation of a suitable pumped device as per Policy CL7n. The location of the suitable pump device should be shown on the plans. It is noted that the Drainage Management Plan explains that a pump will be provided to protect the courtyard from sewer flooding in relation to the surface water attenuation tanks. There is also reference to provide backwash pumps in order to clean the pool and a requirement to pump foul water from the basement and lower levels to a high level system. All the details of these systems (pumps and associated holding tanks) including their capacity should be included in the accompanying drawings. The current basement drawings do not show the capacity of the 24 hour attenuation tank for foul water and the pool holding tank. This should be clarified.

3.3 As groundwater has been found onsite it is recommended that the basement is waterproofed. It should be noted that, where the developer proposes to discharge groundwater to a public sewer, prior approval from Thames Water Developer Services will be required. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

Sustainable Drainage Systems (SuDS)

3.4 Policy CE2e of the Local Plan requires a reduction of the volume and the speed of surface water run-off. Policy CL7i also requires SuDS measures. The aim of both policies CE2 and CL7 is to provide an overall betterment or reduction of surface water run-off rather than to maintain the status quo. The proposal should aim to achieve greenfield run-off and a minimum of 50% attenuation of the site’s (prior to re-development) surface water runoff at peak times.

3.5 The Drainage Management Plan explains that there will be an overall reduction of 81% of surface water run-off for the 1 in 100year event plus 40% climate change which will meet the Council’s and the GLA’s policies. However, it should be explained if this reduction will be provided for all events up to the 1 in 100yr event plus climate change or will only attenuate the 1 in 100 event as this is not clear from the documentation submitted. Betterment should be provided for all events.

3.6 The main SuDS proposed is an attenuation tank with a capacity of 100m³ at a lower ground level which will require pumping and will not provide other benefits apart from surface water storage. Tanks are also more expensive to build and maintain than other SuDS such as green/blue roofs and infiltration techniques. Furthermore, there is potentially feasibility to provide other more sustainable SuDS (living roofs and infiltration) and this should be explored further rather than leaving it for a
later planning stage. SuDS should be considered from the outset, when the design of the development is still flexible. If these type of SuDS are feasible, they should be prioritised over tanked systems, following the London Plan drainage hierarchy.

3.7 Also, information regarding SuDS maintenance is limited to the underground attenuation. If other SuDS are proposed, the maintenance plan should include all of the SuDS measures.

Summary

3.8 Further information is required:
   - The capacity of the foul tank (24hour attenuation tank) and the pool holding tank.
   - Clarification regarding the proposed 81% surface water run-off reduction: is it proposed for all events up to and including the 1 in 100yr event plus 40% climate change? Betterment should be provided for all events.
   - The final feasibility of more sustainable SuDS (blue/green roofs and infiltration) and if so all the details associated with their implementation and maintenance. If these type of SuDS are feasible, they should be prioritised over tanked systems, following the London Plan drainage hierarchy. If they are not feasible a robust explanation should be given as the site investigation has already shown that the geology of the site could potentially support infiltration.

4.0 Construction Environmental Management Plan

4.1 The draft Construction Environmental Management Plan provided is a very standard general document. It basically states that the contractors Knight Build will be a member of the Considerate Contractors Scheme. There are no references to BS5228 parts 1 and 2, no Reference to the Mayor of London’s Dust Emission controls, or the means of demolition of the building, excavation and the silencing of plant and equipment proposed to be used on site. In its current form it is inadequate and would need to be upgraded.

4.2 Section 6.8 of the draft CEMP sets out an acceptable transport and highways strategy.

5.0 Transport Assessment

5.1 A draft Transport Assessment (TA) prepared by WSP has been submitted for comments. The following comments must be addressed in final submission.

Off-Street Car Parking
5.2 The provision of 18 off-street car parking spaces at a ratio of 0.33 spaces per dwelling within an automated car stacker is considered to be acceptable and in accordance with CT1(d)(e).

**Forecast Trip Generation**

5.3 It does not appear that staff trips have been included in the assessment with Underground and Bus considered likely to be the best used modes for those trips.

5.4 The number of forecast taxi movements at only eight per day is considered to be an under estimation, although it may equally be the case that the Vehicle Passenger mode is an over estimation and would balance out. It is suggested that the applicant reviews these figures.

**General Points on the TA**

5.5
- 1.2.1 & 3.2.1 - Reference to the site being “within the Brompton area” is queried and is potentially confusing. The site is within the Stanley ward in Chelsea;
- 3.4.1 - Dovehouse Street is a designated cycle route;
- 3.5.2 - The site is one minute not five-minute walk from the King’s Road;
- 3.5.9 - The site is approximately a 15-minute walk rather than 10 minute walk from Sloane Square underground station;
- 3.5.18 - Probably worth clarifying that the acceptability of this scheme is not premised on a Crossrail 2 station being delivered in Chelsea;
- 4.3.3 - The accuracy of figure 4.1 is queried as there are not off-street car parks in the locations shown. They instead look to show locations of on-street Pay & Display bays;
- 5.2 - The proposed drop-off facility on Dovehouse Street is not acceptable to RBKC Planning officers in design terms. The drop-off and pick-up strategy will need to reconsidered as part of the process of redesigning this element;
- 5.2.3 - Replace “car park” with “car stacker” and “service yard” with “service bays”;
- 5.3 - It should be confirmed within this section that all 54 units will be designated as permit-free through an appropriate legal agreement;
- 5.3.2 - Remove “car park”;
- 7.1.3 - As or even more important than the site’s PTAL is the fact that it is within easy walking distance of a wide range of local amenities along the King’s Road. This should be referred to.

5.6 **Draft CTMP**

5.7 Since the advice issued in PPA Advice Note 3 a revised draft has been submitted for comment. The revised draft does not confirm that vehicles would be able to turn within the site. The submitted tracking diagrams
show vehicles entering and exiting the site in a forward gear but it is not shown how or where they would turn around. The site is in theory large enough for vehicles to turn but whether it is in practice feasible will depend on how the site is laid out. This is the same point as per para 4.5 of the previous advice note and this issue still needs to be clarified.

### 6.0 Draft Travel Plan

#### 6.1

A draft Travel Plan prepared by WSP has been submitted for comments. The document is largely acceptable but the following comments should be addressed in final submission:

- 1.2.1 & 3.2.1 - Reference to the site being “within the Brompton area” is queried and is potentially confusing. The site is within the Stanley ward in Chelsea;
- 3.4.1 - Dovehouse Street is a designated cycle route;
- 3.5.2 - The site is one minute not five minute walk from the King’s Road;
- 3.5.9 - The site is approximately a 15 minute walk rather than 10 minute walk from Sloane Square underground station;
- 7.3 - The proposed drop-off facility on Dovehouse Street is not acceptable to RBKC Planning officers in design terms. The drop-off and pick-up strategy will need to reconsidered as part of the process of redesigning this element;
- 7.3.3 & Table 8.1 - The provision of a couple of “Pool Bikes” is considered a good way to reintroduce residents to cycling who may no longer own a bicycle. The provision of a “chaperone service” whereby staff members accompany residents on short trips within the local area may encourage walking rather than taxi trips for residents who are less confident in the mobility.

### 7.0 Waste Management Strategy

#### 7.1

A draft Waste Management Strategy prepared by WSP has been submitted for comments. In terms of highways and transport matters the document is considered to be acceptable with adequate on-site storage provision made to ensure that waste will not be left on the highway for extended periods of time and a fit for purpose management process for is collection proposed.

### 8.0 Energy Statement

#### 8.1

I have no comments on the draft energy statement other than the current assessment is based on plans provided in November and you should ensure the assessment is updated to reflect the submission scheme. No appendices have been included but it is noted that solar panels are proposed on the roof and the detail of these and their potential impact on the appearance of the building must be duly considered.
### 9.0 Sustainability Strategy

**9.1** I have no comments on the draft statement.

### 10.0 Operator Statement

**10.1** Further information concerning the proposed C2 land use and key details of the operator statement that will be submitted with the application have been provided in the pre-application statement dated November 2016 prepared by Savills. The broad principles are acceptable however further information/clarification should be provided on the following points:

- What is included within the “basic level of care” referred to as included within the standard service charge should be specified.
- The specific design features that are included within the development in order to meet the needs of residents should be referenced in the statement.
- The assistive technology that will be fitted as standard into residential units should be clearly set out in the document.
- Staff ratios for the facility should be included.
- The make-up and number of staff that will be based on-site should be specified (day and night shift).
- Any specific provision for dementia patient care should be specified within the document.

### 11.0 Deliverables

**11.1** Following the initial list of Deliverables supplied by the Council in the pre-application advice note dated 01/06/2016 (reference AR/16/00420) please see updated list of deliverables below:

- Full planning application form
- CIL form and calculator
- Relevant Fee
- Location Plan at 1:1250 with site outlined in red, and a blue line indicating any adjacent land owned by the applicant
- Site Plan at 1:200 or 1:500, showing footprint of all buildings existing on site in relation to site boundaries and neighbouring buildings
- Existing and proposed floorplans, elevations and sections to a scale of 1:50 or 1:100. All plans should include the paper size, scale and a scale bar.
- Planning statement including draft Heads of Term
- Operator Statement for C2 use
- Design and Access Statement
- Arboricultural impact assessment including existing tree survey
- Tree mitigation and landscape report
- Structural methodology statement
- Draft demolition and construction environmental management plan
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|   | Draft demolition and construction traffic management plan  
|   | Heritage and Townscape Visual Impact Assessment (View Document)  
|   | Energy Statement  
|   | Sustainability statement  
|   | Draft travel plan  
|   | Transport Assessment  
|   | Waste Management Strategy  
|   | Drainage Management Plan (SuDs proposals)  
|   | Land contamination desktop study (geo-environmental & geo-technical study)  
|   | Sunlight and daylight report  
|   | Acoustic report  
|   | Air Quality Assessment (to include air quality neutral assessment)  
|   | Statement of Community Involvement  
|   | Lighting report  
|   | Ventilation/ extraction details.  |

11.2 The application should be submitted in hard and soft copy. 1 full set of the documents in hard copy should be submitted with the soft copy on a CD with files appropriately labelled, with no individual file size exceeding 10MB.

12.0 Next steps

12.1 The documents should be updated in accordance with the comments above for submission of the application.
1.0 INTRODUCTION

1.1 This advice note follows the pre-application meeting on 11th January and provides feedback on the revised options for the Dovehouse Green elevation and ground floor layout as well as the drop-off point on Dovehouse Street sent by email.

2.0 Dovehouse Green Options

2.1 Out of the 2 options proposed the 2nd option which places the active use (café/reading room) adjacent to the boundary with the Royal Brompton Hospital site is preferable. In the absence of a more active and engaging ground floor as recommended by officers, this option could go some way to acting as a transition between the adjoining retail façade and the proposed private C2 residential units. The plans provided do not demark any external ground floor treatment/layout such as defensible space for the residential units and as such this advice is based on the information provided.

2.2 Officer’s concerns regarding the height of the building as it fronts Dovehouse Green as set out in Advice Note 2 (dated 19/12/2016) is not considered to have been sufficiently addressed through the revised options presented. The elevational treatment has not been developed sufficiently to respond to the comments regarding legibility or presence.

3.0 Drop-Off
3.1 The revised drop-off with a 3.5m central inset of the building on Dovehouse Street is still considered to have a dominating and significant impact on the elevation. Notwithstanding this, it would be the most preferable out of the various options presented to date, recognising that the use as C2 accommodation does require a drop-off facility. It is disappointing that this facility could not have been accommodated in such a way that was more responsive to the surrounding context so as not to undermine the legibility of the street scape.

4.0 Summary

4.1 It is understood that the planning application for the site is due to be submitted on 27th January. It is therefore advised that in relation to the layout of the ground floor, option 2 would be officer’s preference despite this not satisfactorily addressing the issues of scale raised previously.

4.2 In relation to the drop-off, the latest option is preferable to those previously presented despite its impact on the Dovehouse Street façade.