

## 24-28 Warner Street

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## Design Statement Supplement

24-28 Warner Street

Section 73 application.

Minor material amendment as a variation of  
condition 14 of planning permission 2011/5129/P

For Aitch Group & 24 - 28 Warner Street LLP

September 2012

Rev -

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## Introduction

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**I** This Document acts as a supplement to the original Design and Access statement provided for the consented planning application 2011/5129/P and explains the changes evolving from the detailed design for the site that have affected the consented drawings, and therefore require a Section 73 application for minor material amendment as a variation of condition 14 of the original planning permission.

The proposed amendments are the product of the evolution of the detailed design by the design team with input from Building Control. They incorporate requirements from building control, recommendations on build-ability, improvements for thermal performance, and recommendations from market advisors in terms of end user expectations. We believe that they deliver a more sustainable building that is; more efficient in construction, delivers great residential amenity, and will be more effective in life-cycle costing.

These changes and this application have been discussed as part of a pre-application procedure submitted in July and registered as enquiry reference ENQ\05553, resulting in a meeting on Tuesday 21st August with Jonathan Markwell and formal written response dated 29th August 2012. The replacement design contained within these replacement drawings respond to the comments provided and incorporates much of the advice given.

The proposals are for non material or minor material amendments to the existing consented scheme. In accordance with Section 73 of the Town and Country Planning Act (1990) as amended and the guidance Greater Flexibility for Planning Permissions “a minor material amendment is one whose scale and nature results in a development which is not substantially different from the one which has been approved”.

The proposals do not substantially differ from that which has been approved:

***“the erection of basement and part three, four and five storey building to create 12 self contained residential units following the demolition of the existing two storey warehouse building”.***

This initial view was confirmed by the planning department through the pre-application stage, and indeed many of the changes were seen as non materially amendments. However, it seemed more effective for the client and the planning department for them to be considered collectively in one single application.

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## Replacement Drawings

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**3** Condition 14 states:

The development hereby permitted shall be carried out in accordance with the following approved plans:  
3621 (P) 010A; 011A; 012C; 013A; 014A; 015A; 016; 020C; 030B; 031A; 032A; 033B; 034A.

The proposed replacement drawings are numbered as follows:

3001 (P) 011\_D;012\_F;013\_D;014\_D;015\_D;016\_C;017\_B;020\_E;030\_D;031\_C;032\_C;033\_C;034\_B

The schedule below lists the original drawing, its title and corresponding replacement drawing:

|                  |  |                  |
|------------------|--|------------------|
| 3621(P)010 Rev A | SITE PLAN Proposed Drawing                 | 3001(P)011 Rev - |
| 3621(P)011 Rev A | BASEMENT PLAN Proposed Drawing             | 3001(P)011 Rev D |
| 3621(P)012 Rev C | GROUND FLOOR PLAN Proposed Drawing         | 3001(P)012 Rev F |
| 3621(P)013 Rev A | FIRST & SECOND FLOOR PLAN Proposed Drawing | 3001(P)013 Rev D |
|                  | SECOND FLOOR PLAN Proposed Drawing         | 3001(P)014 Rev E |
| 3621(P)014 Rev A | THIRD FLOOR PLAN Proposed Drawing          | 3001(P)015 Rev D |
| 3621(P)015 Rev A | FOURTH FLOOR PLAN Proposed Drawing         | 3001(P)016 Rev C |
| 3621(P)016 Rev - | ROOF PLAN Proposed Drawing                 | 3001(P)017 Rev B |
| 3621(P)020 Rev C | WARNER STREET ELEVATION Proposed Drawing   | 3001(P)020 Rev E |
| 3621(P)030 Rev B | A & B ELEVATION Proposed Drawing           | 3001(P)030 Rev D |
| 3621(P)031 Rev A | C & D ELEVATION Proposed Drawing           | 3001(P)031 Rev C |
| 3621(P)032 Rev A | EE & FF ELEVATION Proposed Drawing         | 3001(P)032 Rev C |
| 3621(P)033 Rev B | SECTION GG & HH Proposed Drawing           | 3001(P)033 Rev C |
| 3621(P)034 Rev A | SECTION JJ & KK Proposed Drawing           | 3001(P)034 Rev B |

## Outline Changes

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- 4** Whilst there are various non material internal layout changes due to refining the design, below is an outline of the more significant changes to the design. The schedule section (5) goes through the changes in greater detail, and keys them onto the markups of the replacement drawings. The schedule also gives an indication of which of these changes we consider **Non Material Amendments**, and which we consider **Minor Material Amendments**.

*(NB this section was included in the pre-application submission)*

### **Lower Ground Floor:**

The consented planning drawings did not indicate the requisite lift pit, required by the lift manufacturers for Health & Safety reasons for future safe maintenance of the lift. When this was added to the drawings it became apparent that it did not make sense to in effect construct 3 separate basement areas, each requiring extensive excavation, retaining walls, damp-proofing etc. Therefore to minimise the length and impact of these works on neighbours (social), minimise energy and material use (environmental), and be more efficient, it made sense to combine these part basements into a single area and rationalise the retention walls on sustainability grounds (triple bottom line).

The revised basement provided the opportunity to move the isolated bedroom from ground floor to the same level as the other bedrooms, as this would be more conducive to family life and reduce the potential disruption to this bedroom from activity in the adjoining living room. The enlarged excavation also provided us with the opportunity to enlarge the external amenity space for the 3 and 2 bed family flats at the lower level.

In order to provide the required floor to ceiling heights for Building Control purposes we have had to reconfigure the floor levels slightly, in particular dropping the basement level to provide adequate headroom there. We have also taken this opportunity to make the units at ground floor level consistent and eliminate the need for ramps to the reception area, corridor and amenity space to the rear.

As the above alterations are below ground or internal, they are not visually noticeably from the street and so do not have an impact on any third party. The changes do not result in an increase in overall Net Internal Residential floor area and we believe create a more sustainable development which will enhance the living experience, accessibility and amenity of future residents.

### **Ground Floor Level:**

Very few changes are proposed at this level, just following discussions with Registered Providers over their adoption of unit 2 as a stand-a-lone affordable flat we need to introduce a lobby to improve privacy, security, fire protection and energy efficiency. This has required a minor realignment of the front wall at ground level as shown on our ground floor plan. This is still within the curtilage of our site, in line with other ground floor elements, is filling in space under the first floor overhang and visually strengthening the massing above and improves the quality of the affordable flat for the enjoyment of its residents.

### **Third floor Plan:**

Unit 10 as approved was a small unit and was difficult to plan internally to meet Life Time Homes Standards. This unit was already struggling to work from an internal planning perspective, due to an oversized balcony designed so that the window to the common corridor could act as a vent in the case of fire. By re-planning

unit 11 we have been able to introduce a more suitable louvered Automatic Opening Vent unit to ventilate the common corridor in the event of a fire, to the satisfaction of the London Fire Brigade. This will also eliminate the issue of overlooking the balcony from the corridor window, previously restricted by the 'hit & miss' Western red cedar screen in front of it. Having resolved this it then enabled us to repeat the improved consented layout of units 4 & 7 from the floors beneath, achieving the Mayor's guidance area for the flat, whilst still providing the requisite external amenity space on the balcony. As this is a repeat of the consented layout for first and second floor, we believe that this is an appropriate design that will provide a flat compliant to the Mayor's space standards and an improved layout for the resident of unit 10.

With the internal planning of unit 11's master bedroom, window W.3.P/01 is now to an ensuite bathroom. We have therefore made it obscured glazing. It will still provide the same size of reflective glass surface at this level and in the same location as the consented scheme. This is required to protect the privacy of the residents of unit 11.

#### **Fourth Floor:**

The London Fire Brigade have insisted on an additional Automatic Opening Vent (AOV) to the head of the staircase, to vent the main escape stair, should smoke leak into it. The required changes are to meet Part B of the building regulations and will have no visual impact as it will only protrude 500 mm from the roof.

With the increase in external wall thickness, this flat was significantly reduced in size. We have therefore added a secure pass key to the lift for the upper floor, enabling the lift door to act as the front door for unit 12. We have also agreed with the London Fire Brigade that the lift lobby can become part of the flat, simplifying the internal circulation for this level. This enabled us to relocate the ensuite shower to beside the lift, resulting in a minor change to window W.4.P/07, making it smaller, and obscured. It will still provide a reflective glass surface at this level in this location, as per the planning drawings.

With the internal planning of unit 12, window W.4.P/02 is now to the family bathroom. We have therefore made it obscured glazing. It will still provide the same size of reflective glass surface at this level and in the same location as the consented scheme.

Access to the roof terrace through the doors to the southern elevation is constrained due to the depth of the terrace at this point. We therefore are proposing a set of doors is added to the western elevation to provide more ready access to the roof terrace, in particular for the movement of garden furniture, a table and chairs, onto the terrace. As this is located behind the Western red cedar Screen, so it will have no impact on neighbouring amenity nor alter the approved side elevation.

#### **Roof Plan:**

With the additional AOV requirements by the LFB, we will relocate two of the PV units on the roof to make space for them.

# Schedule of proposed Amendments

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**5** Below is a schedule of design changes as indexed on the replacement drawings. For each item we have indicated our view on the materiality of the amendment (**NMA = Non Material Amendment, MMA = Minor Material Amendment**), and a summary of our reasons for the change which are expanded upon later in the document.

## LOWER GROUND FLOOR

**L01: Lower ground floor light wells enlarged to provide better amenity space. MMA**

As a product of L09 the opportunity is taken to increase the amenity space for units 1 & 3.

**L02: Glass floor replaced by spiral stair to access enhanced and more private external amenity space at lower level. MMA**

This enables direct access from the ground floor living room to the enlarged external amenity space at ground floor level. This provides enhanced amenity for the residents of unit 1 by providing more external space with a greater level of privacy.

**L03: Retaining walls rationalised and introduction of bridge link with boundary fence beneath. MMA**

As a product of L09 a bridge link is introduced at ground level with a fence below to provide separate external amenity spaces to unit 1 & 3.

**L04: Enlarged floor plate providing re-planned family bathroom and store. MMA**

As a product of L09 the opportunity is taken to more effectively plan the Lower ground Floor.

**L05: Lift pit correctly shown. NMA**

A lift pit is required for health and safety when maintaining lifts, something not indicated on the consented drawing.

**L06: Pump room to boost mains water pressure to reach the top flats. ( Offset required for access from bin store) NMA**

Upon detailed investigation it was found that the existing water pressure is insufficient to reach the top flat, therefore a booster pump set is required. To access this space for maintenance, the retaining wall is offset to align it for an access hatch in the bin store.

**L07: Bedroom relocated from ground floor facilitated by rationalised excavation. NMA**

As a product of L09 the opportunity is taken to relocate the third bedroom from Ground Floor (GF) to Lower ground Floor (LGF), enabling all the bedrooms to be on the same level—which is particularly important for families with young children. A bedroom at the entrance level is not a requirement of Lifetime Homes, however the space is still available for temporary screening for any temporary disability, or in the case of long term disability, the knock out panel is located to provide a relatively easy installation of a hoist from the living area to the master-bedroom. We therefore consider this an improvement in general residential amenity whilst still maintaining the requirements of Lifetime Homes.

**L08: Rationalised circulation space from above. NMA**

The staircase, Ensuite and lobby to unit 3 have been rationalised to make more efficient use of space at Ground and Lower Ground Level.



**L09: Rationalised lower ground floor excavation. MMA**

The consented scheme had a very inefficient Lower Ground Floor plan in terms of excavation, suggesting two separate excavations with parallel retaining walls. Separate excavations introduce significant construction complexity and unnecessary Health and Safety risks, as to try and retain the central “non-excavated” area would require significant temporary works and dangerous working. It would be a lot safer to excavated this central area along with the adjoining areas as a single excavation. It would be very inefficient in construction materials to then build back two parallel retaining walls and insert soil between. Therefore, in terms of sustainability and reduction of construction material, it is more efficient to utilise this space as proposed to enlarged external amenity space and re-provide internal space to offset the loss through introducing additional insulation in the external walls.

**L10: Additional storage cupboard and re-planned ensuite. NMA**

As a consequence of L08/L09/L11 the opportunity is taken to provide a more effective layout to these areas.

**L11: Rationalised retaining wall line. NMA**

Alongside item L09, opportunity was taken to rationalise the design of the retaining walls to be as efficient as possible and reduce the use of materials with a high embodied energy, thus providing a more sustainable development.

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## 5 GROUND FLOOR

### G01: Glass terrace replaced with spiral staircase to lower ground floor terrace. **MMA**

This enables direct access from the ground floor living room to the enlarged external amenity space at ground floor level, which provides enhanced amenity for the residents of unit 1 by providing more external space with a greater level of privacy.

### G02: Landscaping to bridge link removed to lower level. **MMA**

This enhances residential amenity to units 1 & 3 by improving light levels to the lower level, and by providing an enlarged private amenity space at lower ground floor level. Privacy to lower ground floor bedrooms is maintained through raising the balustrade level on the bridge link to 1.35m which with obscure glass maintains or reduces overlooking into the bedrooms below. (See section on Privacy).

### G03: WC increased for Lifetime Homes, resulting in re-planning of staircase. **NMA**

As unit 1 has more than 3 habitable rooms, Lifetime Homes requires an accessible bathroom at the entrance level. This necessitates a re-planning of the surrounding area and the staircase to deliver a simple and efficient layout.

### G04: Bedroom moved to lower ground floor. **MMA**

As a product of L09 the opportunity is taken to relocate the third bedroom from Ground Floor (GF) to Lower ground Floor (LGF), enabling all the bedrooms to be on the same level—which is particularly important for families with young children. A bedroom at the entrance level is not a requirement of Lifetime Homes, however the space is still available for temporary screening for any temporary disability, or in the case of long term disability, the knock out panel is located to provide a relatively easy installation of a hoist from the living area to the master-bedroom. We therefore consider this an improvement in general residential amenity whilst still maintaining the requirements of Lifetime Homes.

### G05: Bridge link pulled further away from unit 1, and levels adjusted so ramp not required. **MMA**

By pulling the bridge link away from unit 1, it reduces any overlooking from it by other residents accessing the communal landscaped courtyard. The removal of the ramp from this link will also assist access to the communal landscaped courtyard. Privacy to lower ground floor bedrooms is maintained through raising the balustrade level on the bridge link to 1.35m which with obscure glass maintains or reduces overlooking into the bedrooms below. (See section on Privacy).

### G06: Wall thickness increased to improve thermal performance and required for load-bearing structure. **MMA**

The external wall thickness has been increased to accommodate both an increase in wall insulation (to improve the overall thermal performance of the building), and provide a generally load bearing structure that reduces the embodied energy in the building. This is a more sustainable approach, however it does have knock-on consequences for the internal layouts, including a loss in Gross Internal Area, even despite their being an overall increase in Gross External Area due to the rationalisation of the LGF excavation.

### G07: Ducts required for vertical circulation of services. **NMA**

This is a requirement to enable efficient servicing of the flats. This has been designed efficiently to be part of the stair core.

**G08: Levels rationalised so internal ramps not required. MMA**

We believe this will have a small amenity benefit for access into the building, albeit linked to additional excavation discussed elsewhere.

**G09: Entrance canopy added to protect wheelchair entrants from rain, as required by Lifetime homes. MMA**

There is a requirement under Lifetime Homes to provide protection from the elements for people in wheelchair access approaching the main entrance to the flats. This suggests recessing the entrance into the building. However, under secured by design there is a maximum recess to maintain safety. To balance these two requirements we have introduced a canopy to the main entrance. This, alongside item G11 has been discussed with Camden's design officer, Alan Wito, who has supported this approach.

**G10: Layout rationalised to be more efficient. MMA**

The staircase, WC and kitchen to unit 3 have been rationalised to make more efficient use of space at Ground and Lower Ground Level.

**G11: Lobby added to unit 2 for improved residential amenity through improved security and reduce energy loss. Resulting in change to facade to improve daylighting and maintain compliance with mayors space standards. MMA**

Following feedback from Registered Providers, we have added a lobby to unit 2 to improve security and thermal performance. As a consequence of this, comments from the secured by design officer noted earlier, and the loss of some floor area due to the increase in the external walls, we have redesigned this front elevation. This, alongside items G09 has been discussed with Camden's design officer, Alan Wito, who has supported this approach.

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## 5 FIRST FLOOR

### F01: Utility cupboard added, and store swapped with bathroom. **NMA**

The opportunity is taken to swap the store and bathroom, allowing a combined store and utility space to be provided, giving a more efficient layout.

### F02: Door from balcony added to living room. **NMA**

To increase the ease of access and utilisation of the external amenity space of the flat.

### F03: Riser added. **NMA**

This is a requirement to enable efficient servicing of the flats. This has been designed efficiently to be part of the stair core.

### F04: Unit 6 re-planned—not for wheelchair use. **NMA**

As unit 9 has been designated the wheelchair flat, the internal layout of unit 6 has been rationalised.

### F05: Ensuite added to master bedroom. **NMA**

Unit 5 has been re-planned to include an ensuite to the master bedroom to improve residential amenity.

### F06: Unit 5 Kitchen rationalised with wall re-alignment **NMA**

With a straight party wall, this provides a more efficient kitchen layout.

## **SECOND FLOOR**

### **S01: Utility cupboard added, and store swapped with bathroom. NMA**

The opportunity is taken to swap the store and bathroom, allowing a combined store and utility space to be provided, giving a more efficient layout.

### **S02: Door from balcony added to living room. NMA**

To increase the ease of access and utilisation of the external amenity space of the flat.

### **S03: Riser added. NMA**

This is a requirement to enable efficient servicing of the flats. This has been designed efficiently to be part of the stair core.

### **S04: Unit 9 re-planned for wheelchair use. MMA**

Unit 9 has been designated the wheelchair flat. A more efficient design that complies with Wheelchair Housing Design Guide as per the original planning application. This is discussed later.

### **S05: Ensuite added to master bedroom. NMA**

Unit 8 has been re-planned to include an ensuite to the master bedroom to improve residential amenity.

### **S06: Unit 8 Kitchen rationalised with wall re-alignment. NMA**

With localised thinning of the external wall to unit 9 we can provide a straight party wall, this provides a more efficient kitchen layout.

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## 5 THIRD FLOOR

### T01: Unit 10 re-planned as unit 7. **NMA**

With the increase in external wall thickness unit 10 falls significantly under the Mayors guidance, and is very inefficient in plan. The layout has therefore been amended to match unit 4 and 7 by reducing the size of the balcony. These changes are discussed in greater detail later.

### T02: Riser added. **NMA**

This is a requirement to enable efficient servicing of the flats. This has been designed efficiently to be part of the stair core.

### T03: Screened window replaced with automatic vent. **NMA**

With the change in flat layouts, this provides a more effective means of venting the common lobby, and also enhances the privacy of unit 10's balcony.

### T04: Ensuite relocated to corner. **NMA**

Internal re-planning to improve residential amenity, that also requires the external window to be obscured. Cf E02

### T05: Shower room moved from behind lift to external wall, with further rationalising of circulation. **NMA**

Internal planning to provide a more rational and efficient layout.

**PENTHOUSE LEVEL (Fourth Floor)**

**P01: Rationalised bedroom with ensuite, due to simplified circulation. NMA**

Internal planning to provide a more rational and efficient layout.

**P02: Riser to roof. NMA**

This is a requirement to enable efficient servicing of the flats. This has been designed efficiently to be part of the stair core.

**P03: Lift lobby included in the flat as a private entrance. NMA**

The introduction of key access in the lift for anyone to access the fourth floor, has enabled us to include the lift lobby as part of the circulation of the flat, enabling more efficient space planning.

**P04: Rationalised circulation, enabling enlarged living space. NMA**

As a consequence of P03, the opportunity is taken to increase the living space and improve residential amenity.

**P05: Enlarged family shower room. NMA**

As a consequence of P03, the opportunity is taken to improve the internal layout, requiring the external window to be obscure. Cf E02

**P06: Improved access to roof terrace. NMA**

The existing access to the roof terrace is significantly constrained, so additional doors have been added to the roof terrace, but hidden behind the existing external screening.

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## 5 ROOF PLAN

### R01: Higher powered PV panels **NMA**

To take advantage of the latest developments in PV technology the roof layout has been updated to accommodate the modern higher powered PV panels.

### R02: Additional roof hatch with AOV over staircase.

With the lift lobby now part of the flat, there is a requirement for lift access to the roof from the main circulation stairway. (P03)

### R03: Relocated PV panel.

As a consequence of R02, the displaced PV panels have been relocated.



## **ELEVATION DRAWINGS**

### **E01: Flat PV on top of lift over-run. NMA**

To maximise the generation of energy from renewable sources a PV has been fitted flat to the roof over-run. This cannot be seen from road level, however a panel set at an angle could be seen from close by.

### **E02: Obscured glass NMA**

These pickup internal bathrooms, as noted on the plans.

### **E03: Canopy over entrance. MMA**

This picks up item G09.

### **E04: Low level glass for security. MMA**

This overcomes a slight concern of the Secure by Design consultant that an intruder that happened to gain entrance could hide behind the post area and attack a resident returning home from behind. This window provides a floor view to enable the resident to either pickup any legs or any shadow cast by an intruder in this area. This, alongside items G9 & G11 has been shown to Camden's design officer, Alan Wito, who has supported this revised elevation.

### **E05: Updated unit 2 elevation. MMA**

This picks up on G11 which has been discussed with Camden's design officer, Alan Wito, who has supported this approach.

### **E06: Updated unit 10. MMA**

This picks up item T01

### **E07: Narrower window with obscured glazing. NMA**

This picks up item P01

### **E08: Rationalised lower floor levels. MMA**

With rationalising the excavation and re-planning the lower ground floor, it also made sense to rationalise the levels and remove internal ramps. This has meant that the excavation depth has increased, as picked up in the Basement Impact Assessment.

### **E09: Rationalised excavation. MMA**

This picks up item L09

### **E10: new bridge link with heightened balustrade. MMA**

This picks up on item L03

### **E11: New bedroom window. MMA**

This picks up on item L07

## Planning Policy Context

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**6** The Planning Officer's Committee Report from December 2011 sets out a helpful summary of the key policy issues relevant to the revised proposals. There have been no material changes in Development Plan Policy between the date of that previous Committee Report and the submission of this application, and therefore we have based our assessment of the policy context primarily upon the previous assessment undertaken by the Council itself.

At the national level, one notable change in policy has occurred, with the issue of the National Planning Policy Framework in March 2012. Before commenting on the key development plan policies, therefore, we provide a brief commentary on the contents of the NPPF and its relevance to the revised scheme now being submitted for approval.

### National Planning Policy Framework

One of the key over-riding messages of the NPPF is set out in the Forward by Greg Clark. Within it, the Minister makes clear that sustainable development (whether economic, environmental or social) is positive.

Sustainable development, the Minister says *"should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision."*

In terms of the thematic policies, the NPPF is supportive of economic development. However, it also recognises that where there is no reasonable prospect of a site being used for an allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

The NPPF is particularly supportive of applications for new residential development. Paragraph 51 in particular states that Planning Authorities:

*"... should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate."*

The NPPF restates the Government's commitment to good design, stating in paragraph 56 that *"... good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."* As described in this Design and Access Statement, the design of this scheme has responded positively to the local context and will provide a high quality sustainable design that will improve the local area.

The NPPF contains a very similar approach to the treatment of heritage assets to that contained in the republished PPS5. It recognises that not all elements of a Conservation Area will necessarily contribute to its significance, and that in such circumstances there can be greater public benefit in allowing redevelopment, which is consistent with the approach adopted by the Council in its decision to grant the previous scheme. Overall, the NPPF is intended to foster a new, pro-active and positive approach to new sustainable development, an approach best summed up in paragraphs 186-187, which state:

*"Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development ... Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."*

### **The Development Plan**

The Development Plan comprises the Camden Core Strategy (adopted in November 2010) and Development Policies DPD, also adopted in November 2010. The Site Allocations DPD is still at Submission Stage, and is not part of the Adopted Development Plan. We understand that there is one extant UDP site specific allocation which has not been superseded, but this is not relevant to the application site.

### **Principle of the use**

As set out in the previous Officer's report, Policy CS8 of the Core Strategy seeks to ensure a strong economy by, amongst other matters, retaining existing employment sites. However, Policy DPI3 also provides that if a site is no longer suitable for business uses, as was found to be the case in this instance, a change of use may be appropriate, including to residential use.

For the reasons explained above, the NPPF endorses such an approach, and the findings of the Council in respect of the last application, and its application of CS8 and DPI3, are consistent with the approach set out in the NPPF. Also, in respect of this application, it is now a material consideration that planning permission exists for a residential redevelopment of the site.

In terms of the principle of demolition, PPS5 has now been replaced by the NPPF, but the NPPF has not substantially changed the overall approach to demolition in Conservation Areas, recognising that features that do not make a positive contribution do not require the same approach in terms of the justification for replacement as would be the case for heritage assets that make a positive contribution, and recognising also that the positive public benefits of redevelopment can be weighed against the loss of the existing feature. The balancing exercise undertaken by the Council in granting Conservation Area consent for demolition is not therefore affected by the change in national policy. Again, the extant consent for demolition and redevelopment now also becomes a material consideration.

### **Affordable Housing**

Policy DP3 sets out the Council's approach to affordable housing. As with the previous application, this proposal includes the provision of an affordable housing unit on site, and an off-site contribution to make up the on-site shortfall such that a full contribution to affordable housing needs is made. This can be secured by a deed of variation to the existing s106 agreement to ensure the contribution reflects the floorspace of the new scheme.

### **Quality of Residential Accommodation**

Policy DP5 relates to residential mix. The proposals provide the same mix as previously, which is in line with the DP5 dwelling size priority table.

Policy DP26 relates to residential quality, and the scheme in its previous, but substantially similar form, was held to comply with the requirements of this policy. However, in the previous scheme, Unit 10 was some 8 sq m smaller than the standards set out in the Council's CPG4 and the London Plan, but this unit has been reconfigured to match units 4 and 7, which although marginally under the required standard, is nevertheless an improvement on the consented scheme.

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**6** Matters in respect of overlooking/privacy, daylight, and Lifetimes homes are considered elsewhere in this Statement.

As with the previous scheme, the proposals follow the principles of Secured by Design.

### **Design**

Matters in relation to the revised design are covered elsewhere in this Statement. The changes to the NPPF and the positive promotion of good design are essentially the same as previously set out in PPS1, and therefore the introduction of the NPPF does not materially affect the consideration of merits of the design, and there has been no change in the Council's previously adopted Design Guidelines SPD.

### **Amenity**

Matters in respect of overlooking/privacy, sunlight and daylight are considered elsewhere in this Statement. There has been no material change to the policy context in respect of such matters since the approval of the previous application.

### **Basement Excavation**

Policy DP27 requires submission of technical evidence in respect of the impacts of basements in areas of possible slope instability and groundwater flow. The previous Basement Impact Assessment has been updated to reflect the revised proposals, and the updated report is submitted alongside this application.

### **Transport**

The policy context in respect of transportation matters has not changed since the approval of the last application. The proposal is within Controlled Parking Zone, and accordingly provides a car free development. The existing s106 provisions in respect of a Construction Management Plan would not be affected by the proposed Deed of Variation in respect of the affordable housing provisions.

### **Sustainability**

The development plan context in respect of sustainability has not changed since the previous approval, and the revised scheme will achieve the same outcomes. At a national level, the NPPF has introduced a positive presumption in favour of sustainable development, with which this proposal would comply.

### **Trees and Landscaping**

There are no material changes to the landscape proposals previously approved, and no material change in the policy context since the previous scheme.

### **Other matters**

There are no material changes to policy in respect of archaeological and contamination issues. The proposal includes the same arrangements for waste and recycling.

**Policy Context Conclusion**

The previous application was approved on the basis that, on balance, it complied with existing Development Plan Policy. The revised proposals provide essentially the same scheme and the relevant Development Plan Policies have not changed. The previous scheme did include some units that fell slightly under the Council's normal standards for internal space, and the current scheme improves upon this position in particular by increasing the size of unit 10.

The NPPF has subsequently been introduced. The NPPF is supportive of positive redevelopment proposals of employment land no longer required, and is supportive of redevelopment in Conservation Areas where there are public benefits and where existing features do not make a positive contribution to the character of the area, as in this case. Above all, the NPPF contains a strong presumption in favour of sustainable development, and encourages a positive approach from Local Planning Authorities in enabling such development to come forward as quickly as possible.

## Justification Of Minor Amendment Status

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- 7** The proposals are for minor material amendments to the existing consented scheme. In accordance with Section 73 of the Town and Country Planning Act (1990) as amended and the guidance Greater Flexibility for Planning Permissions “a minor material amendment is one whose scale and nature results in a development which is not substantially different from the one which has been approved”.

*(NB this section is a summary of what was included in the pre-application submission)*

The proposed amendments have come about as the detailed design of the scheme has evolved with the architect working up the next stage of the design with input from Building Control, the structural engineer and M&E consultant.

The proposals do not substantially differ from that which has been approved:

***“the erection of basement and part three, four and five storey building to create 12 self contained residential units following the demolition of the existing two storey warehouse building”.***

The amended scheme would still match the description of the development on the decision notice. To start with the proposed use will remain the same i.e. a 100% residential scheme (C3 Use Class) comprising 11 residential market units and 1 affordable unit, including ancillary amenity space, landscaping and facilities for refuse / recycling storage and cycles.

**Amount:** the number of buildings being proposed is as approved. The density of the development was found acceptable previously and this has stayed the same in terms of dwellings per hectare. The mix of units has also stayed the same with 3 x 1 bed units, 6 x 2 bed units and 2 x 3 bed units (all private market units) and 1 x 2 bed affordable unit. This mix was specified in the description of the development on the Decision Notice.

The amount of ancillary features such as bin stores and the area for communal landscaped and private amenity space has been retained, and uses the same amount of space as the approved scheme.

**Layout:** the external juxtaposition of spaces remains as previously approved. At ground floor level fronting the street it is proposed to increase the built footprint of Unit 2 by extending outwards by 750mm. This area was previous shown to be part of a raised planter. At the 3<sup>rd</sup> floor it is proposed to reduce the size of the overly large terrace and incorporate part of the space as part of the unit. This will significantly improve the internal layout and the living quality of unit 10.

The internal layouts have been reconfigured but the vast majority of changes do not effect the external appearance of the building i.e. windows do not need to be repositioned so the general appearance of the building will stay as approved. The changes have been implemented to improve the living quality of the units. All changes comply with the standards achieved by the approved scheme i.e. Lifetime Homes which is a requirement of the original planning permission set out in Condition 11.

As outlined in detail later in developing the detailed design of the scheme with respect to delivering the required U-values and meeting the Code for Sustainable Home requirements the overall external wall thickness has increased by over 100mm, resulting in a reduction in gross internal floor area by 43m<sup>2</sup>: inevitably this has effected the internal planning of the scheme.

The layout both internally and externally will be easier for users to understand, maintain and adapt.

The spaces are all fit for purpose and the spaces accessible. The layout optimises the use of the site creating a high quality living environment where people will want to live.

**Scale:** the height, width and length of the building has not changed from the approved scheme. The most notable change on plan is an increase in basement excavation which will not be noticeable from the outside. The rest of the building envelop will remain nearly identical to that which has been approved i.e. with only very limited changes to a section of the ground floor and the 3<sup>rd</sup> floor but these are not materially different from the approved scheme and follow design approaches already established at different levels of the approved building.

The heights of the building have already been deemed acceptable and are similar to those surrounding the property.

**Landscaping:** the landscaping approach to the site is largely based on the approved layout. The basement level landscaped area has been increased slightly improving the private amenity of the basement users. The landscaped area to the rear of the site is in the same location as the previous scheme and includes a landscaped courtyard.

**Appearance:** in terms of materials the planning permission included a condition requiring further information to be provided on this matter. However as the external elevations remain largely unchanged the proposals will look as approved. In the two instances where changes to elevations are proposed the same materials are used as in the surrounding consented elevations so that the changes will not look out of character. There are several minor changes to the treatment of windows to the front façade which simply involve the introduction of opaque glazing.

This assessment of the changes being non material or minor material amendments was confirmed through the pre-application process, formal confirmed in Jonathan Markwell's written response dated 29th August 2012.

## Planning Assessment

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**8** The officers report dated 29/09/2011 on the consented application 2011/5129/P set-out the main material considerations in determining the planning application on the site and summarised as follows:

- Land use – principle of development
- Land use – affordable housing
- Quality of residential accommodation
- Design
- Amenity
- Basement excavation
- Transport
- Sustainability
- Trees and landscaping
- Other matters – waste and Recycling / archaeology / contaminated land
- Other S106 contributions

In considering the affect of the updated proposal I will look at each of the items in the officers report, using the same item numbers for ease of reference.

*(NB this section was included in the pre-application submission)*



### **Land use – affordable housing**

6.8 The updated proposal is similar to the consent application and in accordance with Policy DP3 require a 12% affordable housing for the proposal to be policy compliant. Whilst the overall GEA has increased, the net internal residential provision has decreased.

6.9 The updated proposal maintains the intermediate affordable housing unit on site at ground floor level. (Unit 2). However it should be noted that to attract the registered improvements are required as noted later.

6.10 The updated proposal has not enabled a second affordable unit to be provided on site, nor have circumstances changed to enable off-site affordable housing provision.

6.11 The applicant will continue to make up for the shortfall in on-site affordable housing provision by making a financial payment-in-lieu to the Council's affordable housing fund secured via a Deed of Variation to the original 106 Legal Agreement.

The combination of on-site provision and payment-in-lieu to be secured are together considered to make a satisfactory contribution to affordable housing, compliant with the aims of DP3.

### **Quality of residential accommodation**

6.12 The updated proposal maintains the same mix as the previous consented scheme.

6.13 The updated proposal maintains the similar high standard of accommodation for future occupiers. Each unit is still entirely self-contained and the size of each unit meets or is close to the CPG4 and London Plan standards. After extensive detail design the updated proposal has cut the +ve and –ve deviance of the consented scheme by 25%! In particular Unit 10 of the consented scheme which was 8sqm (16%) below the target 50sqm for 1 bed has been updated to match the large 1 bed units 4 & 7. Also Penthouse unit 12, which was over by 11m2 (16%) is now within 1.5% of its target area.

6.14 With careful rationalisation of internal circulation, each market unit maintains its regular shape, and extra effort has gone into standardising ceiling heights. Dedicated storage spaces are maintained, with utility spaces and both private outdoor amenity space. Vertical stacking has been enhanced with unit 10 now matching the previously consented layouts of units 3 & 7 beneath, with the same amenity space.

Every habitable room has access to natural daylight and outlook and the number of units with one habitable room with a window facing within 30 degrees of south has been maintained.

6.15 The daylight levels to bedrooms at lower ground floor levels have been enhanced by enlarging the lightwells, by relocating some of the planting at ground floor level to lower ground. In addition we have carried out a daylight and sunlight study of the units effected by the updated proposal.

6.16 The sensitive and careful design of the consented scheme that maximised residential amenity of future occupiers in terms of overlooking / privacy both from/to neighbours and within the scheme has been maintained. Whilst unit 10 has changed, it is a copy of the units 4 & 7 beneath, repeating their careful design whilst significantly improving its internal layout and increasing its internal area relative to the mayors standard.

6.17 The updated proposal extends the careful design into the detail in relation to lifetime homes. Where alterations were required to fully implement the standard the detail design facilitates them. So whilst underfloor heating has been introduced throughout, the knock-out panels in units 1 and 3, include to allow a hoist to be retro-fitted if required between the main living space and master bedroom, are now formed in

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8 timber and are clear of any under-floor heating services. Similarly, with the provision of a lift Unit 9 continues to be suitable for wheelchair uses. All other applicable standards continue to be complied with in the design of the scheme

6.18 The updated proposal retains the features recommended by the Crime Prevention Design Advisor, such as controlled access to the rear courtyard, Warner Street balconies are a storey height above ground level video entry system to the building, and external individual postal boxes.

6.19 The intermediate affordable unit retains its consented features except for the addition of an entrance lobby. This assists on the energy, fire and security front but providing a break between the street and the front living room. The extra area also offsets the losses in internal space caused by the increase in the wall thickness to maintain overall energy performance. Step free access into the unit is maintained along with the planting in front of the bedrooms.

6.20 Obviously the updated proposal includes exactly the same demolition of the existing building as previously consented.

6.21 The updated proposal maintains the massing and step backs established through the design iterations of the previous scheme. It still ranges between three and five storeys stepped away from the adjacent Peabody mansion block, to facilitate light entering the rear windows of that building. The new lobby maintains the simple façade treatment to the front. The large window openings to the street, and alternately spaced balconies are maintained through the use of semi-obscure glazing to the windows that now relate to bathrooms that protect the residential privacy and enable more energy efficient venting of these high moisture spaces.

6. The updated proposal maintains the fenestration, height, proportion and scale of the proposed building within its surroundings as considered appropriate given the industrial nature of the conservation area.

6.23 The mix and proportion of materials remains generally unaltered with the timber remaining a subservient material to the brick.

6.24 Balconies are as before, with only the rear balcony to unit 10 diminishing in size whilst still delivering the quantity of external amenity targeted by the mayor for a 1 bed unit.

6.25 The updated proposal maintains the subtle level of ornamentation to the façade as appropriate to the historic buildings in the surrounding area. The ground floor entrance level has been updated in line with the new lobby, with the timber closest to the pavement to provide a more textured and tactile interface to the street.

6.26 The updated proposal maintains the functional rationale of the rear elevation, with only the minor changes visible from the adjoining properties. Unit 10's copy of unit 7 and 4 will improve the regularity of the elevation, and the reduction in size of the AOV to the corridor at 3<sup>rd</sup> floor will assist in the uniformity of the elevation. Whilst the changes to the lower ground floor will not be noticeable from the street they have been aligned with other elevational elements from above to maintain the regularity of this elevation when seen from the common amenity space and bridge link. The introduction of obscured glazing to the 4th floor shower room, will still provide a reflective glass surface at this level in this location, as per the planning drawings.

6.27 The overall scale of the building at the rear is as the consented scheme, with the photovoltaic panels located away from the edges of the building, with very limited visual prominence of the panels from the street.

6.28 In overall terms the updated proposal enhances the character and appearance of the conservation area at this point.

### **Amenity**

6.29 As the updated proposal maintains the same massing as the consented scheme, with the same stepping affect, it will also maintain the residential amenity of neighbouring occupiers.

6.30 In the updated proposal there is no change to the Reglit planks obscured glazing to overcome any possible overlooking from this elevation. The only addition is the further external doors to the terrace of unit 12. As these are located behind the hit & miss privacy screen, they will not affect the facing residents privacy. Similarly the changes to the rear elevation are either at lower ground level or minor reductions in the size of louvres/windows at the third and fourth floor, thereby maintaining the protection to the amenity to residents in Warner's Yard. The only notional change that shortens overlooking distances is through the repletion of unit 4/7 to unit 10. However, as these units were successfully designed to minimise the risk of overlooking neighbouring properties and loss of privacy, their repetition at the third floor would also be acceptable.

6.31 The updated proposal only improves the outlook / sense of enclosure matters in relation to the lower ground floor, with the other areas of the design remaining unchanged.

6.32 With the only changes to the massing occurring in areas such as the ground and lower ground floors, there will be no change in the daylighting to the Peabody mansion block, 5&6 and 8 Warner Yard, 31, 33, 35 and 37 Eyre Street Hill, 11 Warner Street and 5&6 Baker's Yard.

6.33 Consequentially there is also no change in the results in the daylight study of average daylight factor (ADF) and the vertical sky component (VSC) measurements, which are still consistent with the guidance set out in CPG6 Ch 6. Accordingly no further loss of amenity as a result of loss of sunlight is envisaged.

We have updated the daylight study in respect of the changes in the updated proposal and note that the increase in the size of the lightwells and internal re-planning ensures that the bedrooms to the lower ground floor are still deemed acceptable for future residents.

6.34 With the only change in balconies being the slight reduction to unit 10, there should be a slight reduction in terms of noise and disturbance matters.

6.35 Consideration of the amenity of future occupiers of the proposed units has already been outlined in the quality of residential accommodation section above. In short future occupiers are considered to have a suitable standard of residential amenity.

### **Basement excavation**

6.36/37 Whereas the previous proposal incorporated two areas of basement accommodation to serve residential maisonette units 1 and 3, it did not show the lift pit. As mentioned elsewhere it made construction sense to combine these into a larger basement.

As the site is located within an area identified within the Arups study as being susceptible to slope (in) stability and subterranean (groundwater) flow, we have updated the Basement Impact Assessment (BIA) for this amendment, carried out by a suitably qualified professional, which details stages 1-4 of the BIA process outlined in CPG4. It shows no material change caused by the enlarged basement.

6.38 The groundwater conditions on the basis of the boreholes demonstrated some small seepage, but only at a level well below the proposed depth of the updated proposed basement. Given that the potential underlying aquifer was not encountered during investigations in all corners of the site it is considered that the basement will not extend down as far as the aquifer. As such this mitigates the potential impact of the proposed

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**8** basement on watercourses and it is not considered that any specific drainage mitigation measures are required.

6.39 Due to the potential impact on neighbouring buildings in the future, although this is considered unlikely at the present point in time, underpinning of neighbouring buildings (identified by the applicant as No. 30 Warner Street and No. 8 Warner Yard) may be required. We therefore will ensure that a suitably qualified chartered engineer will be appointed to supervise the construction works throughout their duration.

### **Transport**

6.40/41 The consented application accepted the principle of car-free development, required a highways contribution for the removal of the two existing crossovers and repaving the adjacent footway, and the provision of 12 cycle spaces. This updated proposal does not affect these established principles in any form.

### **Sustainability**

6.42 The updated scheme remains on target to achieve an overall Level 3 good rating, as required in CPG3. Furthermore the targeted (50%) credits in the energy, water and materials categories are all anticipated to be met.

6.43 The updated scheme retains the target of the consented scheme. We are still maintaining significant energy generation, albeit that a couple of PV's have been relocated within the scheme for access purposes. The S106 (para 4.13-4.15 & 4.27 & 4.30) both require additional assessments to be submitted and approved with the LPA at a later stage of the design process.

### **Trees and landscaping**

6.44 The updated scheme retains significant quantity of landscaping as per the original scheme, considering it is a tight urban site.

### **Waste and recycling**

6.45 The consented application contained a condition requiring additional information. This updated proposal does not affect the design in regard to any of this and will be progressed via discharge of the conditions.

### **Archaeology**

6.46 The application site is located within an archaeological priority area. The consented application contained a condition requiring additional information. This updated proposal does not affect the recommendation in regard to any of this and will be progressed via discharge of the conditions.

### **Contaminated land**

6.47 The site is located on land identified as potentially including contaminated land. A programme of ground investigations has been undertaken identifying the presence of soil and groundwater contamination and landfill gas. Appropriate remediation works are being prepared for submission to the Council for approval as part of

discharging the existing condition. The updated scheme will reflect this and a final verification report will be provided in this respect upon completion.

**Other S106 contributions**

6.48 The updated proposal will continue to attract education and public open space contributions as per the consented scheme which the applicant will make.

6.49 The updated proposal still results in the change of use and therefore the applicant will enter into obligations to assist with business growth and employment opportunities as previously agreed. These comprised three elements:

- a) agreement to work with the King's Cross Construction Skills Centre to provide employment opportunities to Camden residents during the construction of the development and specifically to ensure that 15% of employees are recruited from Camden's resident population;
- b) to employ one construction industry apprentice recruited via the Kings Cross Construction Skills Centre, the apprentice to be provided with 52 weeks employment, paid at the National Minimum Wage or above and provided with appropriate day release;
- c) to work with the Council's economic development team to provide opportunities to local businesses to tender for the supply of goods and serviced during the construction of the development.

## Items Raised In Previous Application

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**9** During our application for non-material amendments the officer raised the following items as items which he considered were material amendments to the consented scheme. We have repeated these comments in blue with our comments on each in terms of how we have sought to address them and why we consider that the proposed amendment can be approved as a "minor material amendment" (Section 73 application) to the consented scheme.

*(NB this section was included in the pre-application submission)*

*- increase in the proposed floorspace at basement floor level in comparison with that approved;*

As stated elsewhere the proposal does create additional basement gross area, however the consented application omitted the lift pit (+6m<sup>2</sup>). The increased GEA floor space as a consequence of the amendments is 34m<sup>2</sup> (+28m<sup>2</sup> if lift pit added to consented scheme), which when compared to the overall GEA floor area of the consented scheme of 1111m<sup>2</sup> represents a negligible difference: +3% (+2.5% with lift pit). Some of this area is required for additional plant space and with the overall increase in the thickness of external walls there is actually a net reduction in Gross Internal Area (-20m<sup>2</sup>, -2%) and Net Internal residential Area. (-43m<sup>2</sup>, -5%)

*- increase in the amount of excavation in terms of additional depth and additional floor area (and thus potential increased impact on the hydrology of the local area and nearby amenity as a result) in comparison with that proposed;*

We have had an updated Basement Impact Assessment that addresses the issues raised and no new concerns were raised in the report.

*- change in the fenestration associated with unit 1 at basement floor level - this may have an impact on the amount of daylight reaching the master bedroom and bedroom 1, thus impacting on the amenity of future occupiers of this unit;*

We have undertaken an updated Day lighting assessment that addresses the issues raised. It complies with the latest BRE guide lines.

*- provision of bedroom 2 for unit 1 at basement floor level - this may have an impact on the amount of daylight reaching this bedroom, thus impacting on the amenity of future occupiers of this unit;*

The updated proposal has removed this balcony from the proposal. (It was a CAD error on the drawings.)

*- provision of a ground floor extension and associated fenestration alterations on the Warner Street elevation at ground floor level (for unit 2), altering the appearance of the building from the streetscene and relationship of the ground floor with the upper floors, potential changes to the quality of accommodation proposed for unit 2 and potential crime/safety implications as a result of the extension shown to be proposed at this point;*

The updated proposal does alter the street elevation, however the proposal enhances the residential amenity of unit 2, and the introduction of the lobby increases the security to the unit compared with a door entered directly from the street. The alterations have been designed to be in keeping with the overall design proposals for the front elevation.

*- creation of balcony for unit 1 at ground floor level - potential impact on amenity of nearby occupiers in comparison with approved scheme;*

The updated proposal has removed this balcony from the proposal. (It was a CAD error on the drawings.)

*- alteration to the GEA of unit 2 and subsequent impacts for the package of S106 affordable housing contributions secured as part of the approved scheme at the site;*

The updated proposal increases the GEA of unit 2, and any change can be addressed by a legal Deed of Variation with regards the Section 106 agreement.

*- decrease in terrace space for unit 10 and increase in internal floor area - potential quality of accommodation and amenity implications;*

With the increase in the external wall thickness, the layout for unit 10 suffered greatly. The consent layout was already 16% under the mayors target. However, the updated proposal replaces unit 10 with a replication of the approved layout to units 4 and 7. The terrace area is the same as for units 4 & 7 which are approved and overall provides a better balance between external and internal space.

*- reduction in number of PV panels at roof level (to allow an additional roof hatch), potentially impacting on the sustainability credentials of the approved building;*

The updated proposal includes for an additional skylight to improve amenity to flat 12 and provide roof access. The two displaced PV panels are relocated elsewhere, so maintaining the quantity of renewal electric energy produced. In reviewing our proposals we continue to look at further ways to increase the energy generated by PV's over the consented scheme as PV's are the only practical renewable energy source appropriate for this site.

*There are also some more general implications for the whole of the development as a result of the proposed changes, namely:*

*- increase in the GEA of the proposed building as a whole in comparison that that approved and implications for the amount of affordable housing secured on site (potentially both in the number of units secured on site and/or payment in lieu required*

The updated proposal does increase the GEA of unit 2, and any change can be addressed by a legal Deed of Variation with regards the Section 106 agreement.

*- various internal alterations to the layout of the units, potentially leading to differences in whether the lifetime home features previously sought and secured via condition 11 will be achieved;*

The final submitted floor plans will deliver the lifetime homes features and facilities of the consented scheme. As stated elsewhere the updated proposal extends the design quality into the detail in relation to lifetime homes. The applicant is committed to delivering high quality living spaces where people will want to live. It is their intention to delivery homes which meet Life Time Home requirements. Furthermore, there is an existing planning condition controls this matter and so any Sec 73 approval would still need to conform to this requirement.

# Issues Raised During Pre-Application Process

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**10** During our pre-application process the planning officer and other council officers raised several concerns of our proposals. These have been addressed in this submission, but this section provides a quick summary of the issues raised and our response.

## **Basement Impact Assessment.**

*In any future Section 73 application it would be expected for an updated Basement Impact Assessment (BIA) to be submitted for consideration (carried out by suitably qualified professionals – see CPG4 for details).*

This is submitted as a supporting report by a suitably qualified professional under separate cover.

## **Sunlight Study**

*... an updated daylight / sunlight study (using the latest BRE guidance introduced in 2011) will be required to demonstrate a satisfactory amount of daylight / sunlight is being achieved within this room.*

This is submitted as a supporting report compliant with the latest BRE guidance under separate cover.

## **Front Elevation**

*... seek to explore other options (discussing these with my colleague Alan Wito) prior to any formal submission. You are strongly advised that such matters are resolved prior to any formal submission.*

Several options were discussed with Alan Wito, whose preference was for the supported option which omitted the protruding lobby. Cf next section for supporting info.

## **Bridge Link**

*The lack of treatment between the link and the basement and ground floor results in the potential for additional overlooking/ loss of privacy to future occupiers.*

This has been investigated fully, resulting in the bridge links Balustrade being increased to 1.350m with opaque glass sides to provide an improved solution to the consented scheme. Cf next section for supporting info.

## **Internal Areas**

*The internal changes (for example the increase in thickness of walls) may impact on the GIA of each residential unit proposed. Therefore information as to the size of each unit and how this compares with LB Camden CPG2 and the London Plan 2011 standards will be necessary.*

Provided in the next section.

## **Lifetime Homes**

*- various internal alterations to the layout of the units, potentially leading to differences in whether the lifetime home features previously sought and secured via condition 11 will be achieved;*

As mentioned in the meeting the internal plans were being updated to comply in detail. This exercise has been concluded, addressing the officers concerns and delivering the lifetime home features previously sought. Cf next section for supporting info.

## **Wheelchair accessible dwellings:**

*Assuming one of these will still be easily adaptable to wheelchair accessible standards then the following space standards will need to be incorporated:*

Unit 9 has been designated as the “wheelchair accessible dwelling”, and has been designed accordingly. Cf next section for supporting info.

## **Section 106**

*The S106 legal agreement would need to be updated by way of a deed of variation (in order to update the drawing numbers).*



## 24-28 Warner Street Housing Redevelopment

### Design Statement Supplement

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The applicant confirms his willingness to enter into the appropriate deed of variation and pay the legal fees and relevant charges.

#### **CIL**

*Please note that if a Section 73 application is submitted it will (at the time of writing) be liable to the Mayoral CIL*

The relevant CIL form is included in this submission.

#### **NPPF**

*the local planning authority will consider the proposal on updated national and local policies or other material considerations. Hence you are advised to bear in mind and demonstrate how each element of the proposal complies with the NPPF (March 2012) in supporting information submitted with any Section 73 application.*

See section 6.

# Detail Issues

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## II Front Elevation

Below are a selection of images provided to Alan Wiko to review the design of the front elevation.



Front Elevation

Street Perspective



Alternative Main Entrances



Alternative Unit 2 Entrances



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**Bridge Link (Privacy)**

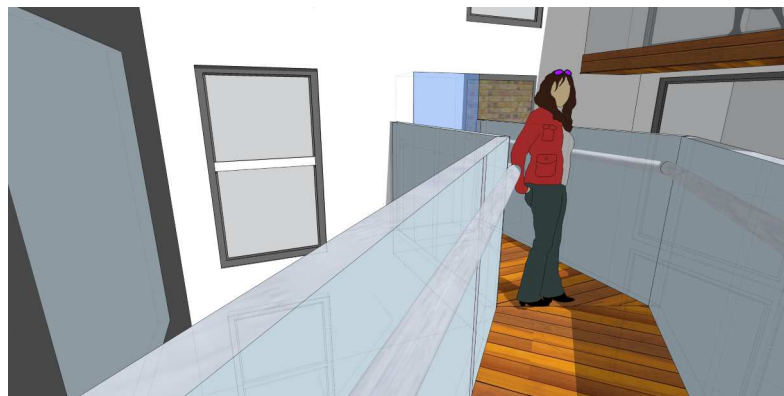
Below are a selection of diagrammatic images used to investigate the potential overlooking issues to the second bedroom of Unit 2 caused by the removal of the protective planting at ground floor level. From the key images it can be seen that a 1.350m high balustrade bridge link with obscured glass, and stainless steel handrail at 1.100, prevents views into the bedroom window.

(Note the dashed lines are lines obscured by construction in front of them)

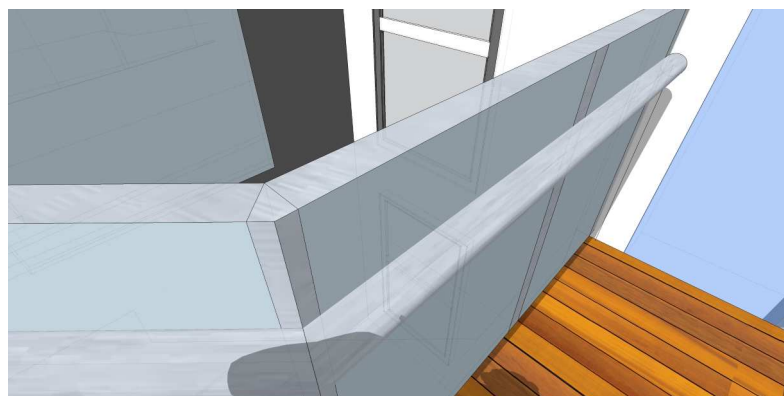
View of Bridge



View from man on bridge



View from woman on bridge



## 11 Internal Areas

Below is an area table showing the GIA per unit, the GIA per floor plate, and the GEA per floor plate.

The GEA of the affordable unit 2, is 68m<sup>2</sup>.

Whereas the units in the consented scheme deviated by + or—16% from the mayors standard, in the proposed scheme this deviation reduces to + or—14%.

| Level               | Unit No.            | Type (Bedroom/ Persons) | Consented GIA           | Proposed GIA | Consented GIA Foot-plate | Proposed GIA Foot-plate | Consented GEA | Proposed GEA |             |
|---------------------|---------------------|-------------------------|-------------------------|--------------|--------------------------|-------------------------|---------------|--------------|-------------|
| <b>Lower Ground</b> |                     |                         |                         |              | <b>107</b>               | <b>130</b>              | <b>134</b>    | <b>158</b>   |             |
|                     | Unit 1 (Duplex)     | See Unit 1              | /                       | /            |                          |                         |               |              |             |
|                     | Unit 3 (Duplex)     | See Unit 3              | /                       | /            |                          |                         |               |              |             |
| <b>Ground Floor</b> |                     |                         |                         |              | <b>197</b>               | <b>186</b>              | <b>219</b>    | <b>225</b>   |             |
|                     | Unit 1 (Duplex)     | 3b 5p                   | 101                     | 112          |                          |                         |               |              |             |
|                     | Unit 2 (Affordable) | 2b 3p                   | 61                      | 61           |                          |                         |               |              |             |
|                     | Unit 3 (Duplex)     | 2b 4p                   | 94                      | 84           |                          |                         |               |              |             |
| <b>1st Floor</b>    |                     |                         |                         |              | <b>212</b>               | <b>200</b>              | <b>232</b>    | <b>232</b>   |             |
|                     | Unit 4              | 1b 2p                   | 48                      | 43           |                          |                         |               |              |             |
|                     | Unit 5              | 2b 3p                   | 61                      | 56           |                          |                         |               |              |             |
|                     | Unit 6              | 2b 4p                   | 75                      | 68           |                          |                         |               |              |             |
| <b>2nd Floor</b>    |                     |                         |                         |              | <b>212</b>               | <b>200</b>              | <b>232</b>    | <b>232</b>   |             |
|                     | Unit 7              | 1b 2p                   | 48                      | 43           |                          |                         |               |              |             |
|                     | Unit 8              | 2b 3p                   | 61                      | 56           |                          |                         |               |              |             |
|                     | Unit 9              | 2b 4p                   | 75                      | 68           |                          |                         |               |              |             |
| <b>3rd Floor</b>    |                     |                         |                         |              | <b>163</b>               | <b>160</b>              | <b>181</b>    | <b>185</b>   |             |
|                     | Unit 10             | 1b 2p                   | 42                      | 43           |                          |                         |               |              |             |
|                     | Unit 11             | 3b 6p                   | 95                      | 87           |                          |                         |               |              |             |
| <b>4th Floor</b>    |                     |                         |                         |              | <b>100</b>               | <b>95</b>               | <b>113</b>    | <b>113</b>   |             |
|                     | Unit 12             | 2b 4p                   | 81                      | 80           |                          |                         |               |              |             |
| <b>Site Area</b>    |                     |                         | <b>312m<sup>2</sup></b> | <b>842</b>   | <b>801</b>               | <b>991</b>              | <b>971</b>    | <b>1111</b>  | <b>1145</b> |

## Lifetime Homes

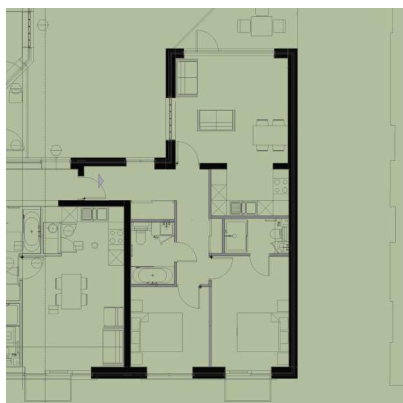
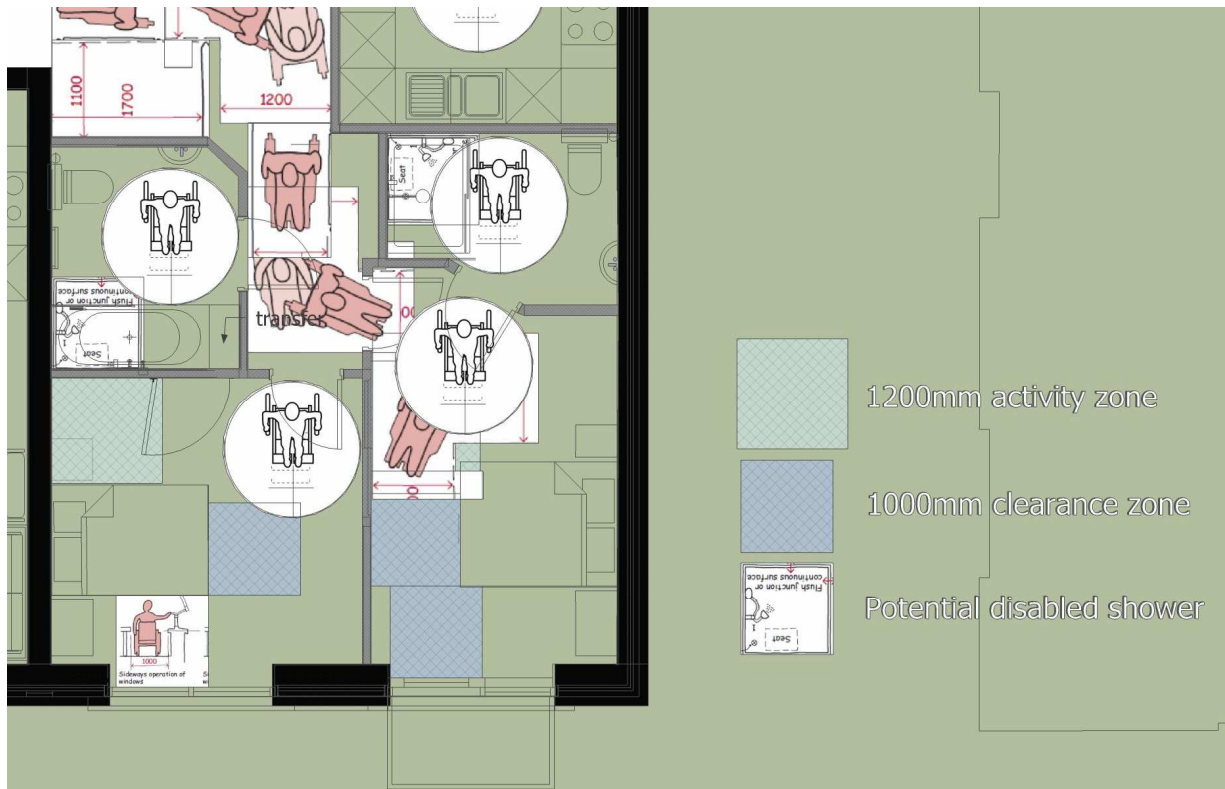
As per the consented scheme the proposal is designed to be accessible at ground floor level and to comply with Part M of the building regulations and DDA. Level access is provided at Street and Courtyard levels. The building has a lift and ambulant stair access serving all floors.

The proposals fully comply with all relevant requirements of the 16no. revised Lifetime homes standards (July 2010).

|     |                              |  |
|-----|------------------------------|--|
| 1.  | Car parking size             | N/A  |
| 2.  | Car parking location         | N/A  |
| 3.  | Level Entrance approach      | Yes  |
| 4.  | Entrance                     |  |
|     | a) Illuminated               | Yes  |
|     | b) Level threshold           | Yes  |
|     | c) Clear opening width       | Compliant  |
|     | d) Weather protection        | Yes- Recessed lobby & canopy                           |
|     | e) Level external landing    | Yes  |
| 5.  | Communal stairs & lifts      |  |
|     | a) Stairs                    | - Compliant  |
|     | b) Lifts                     | - Compliant  |
| 6   | Internal doorways & hallways | - Compliant: Doors min 775 clear Hallways 1050 or 1200 |
| 7   | Circulation                  | - Compliant  |
| 8   | Living at Ent. Level         | - Compliant  |
| 9   | Ent. Level bed space         | - Bedroom at Ent. Level                                |
| 10  | Ent. Level WC                | - Compliant  |
| 11  | WC bathroom                  | - Compliant  |
| 12  | Stair lift & floor lift      | - Compliant  |
| 13  | Hoist Bed. & Bath.           | - Compliant - Concrete                                 |
| 14  | Bathroom main Bed            | - Compliant  |
| 15  | Glazing & handle             | - Compliant  |
| 16. | Service controls             | - Compliant  |

## II Wheelchair Access

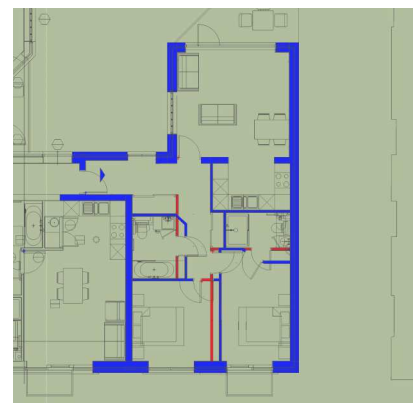
Whilst we concur with the original applicants belief that the location of the site is very unsuitable for a wheelchair user (due to inherent issues in the locality) and particularly for a development that is car free, we have nevertheless planned flats 9 such that it is in accordance with the Wheelchair Housing Standards, as per the original application. This provides a flat with more spacious circulation and additional storage facilities than those designed to meet lifetime homes requirements only. The flat is easily adaptable to wheelchair accessible standards with; handing of a few doors, relocation of a few stud partitions, installation of actuators with wireways already provided, provision of replacement disability sanitary fittings etc. (The diagrams below are taken from our detailed analysis). These can be easily included in the requisite works required to address the unique personal requirements of a wheel chair user who may purchase the flat.



Submitted proposed layout



Adaptions: New stud locations in Green



Adaptions: Removed studs in red

### **Section 106**

The applicant confirms his willingness to enter into the appropriate deed of variation and pay the legal fees and relevant charges.

In terms of Affordable provision, unit 2 provides:

- 68m<sup>2</sup> GEA out of a total development of 1145m<sup>2</sup>.
- 61m<sup>2</sup> GIA out of a total development of 971m<sup>2</sup>.

24-28 Warner Street  
Housing Redevelopment

Design Statement Supplement

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