



**Bacton Low Rise – Minor
Material Amendment
Application**

Planning Statement

May 2014

Our Ref: Q30150

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1 INTRODUCTION

- 1.1 We are instructed by our client, EC Harris, on behalf of London Borough of Camden, to submit an application under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary conditions 9 and 58 attached to planning permission 2012/6338/P.
- 1.2 As discussed at the planning application stage, Camden Housing has been reconsidering the housing mix of the scheme in order to better suit the local needs of Camden residents. In order to do this, they wish to make minor amendments to planning permission 2012/6338/P. The minor change to the mix also necessitates some minor changes to the external elevations, but, as discussed below, these are not considered to be significant. Procedurally this is achieved by substituting plans as shown in Appendix 1, under Condition 58.
- 1.3 As well as providing residential units that better suit the needs of Camden residents, the proposed minor amendments will allow financial concerns to be addressed and allow the scheme to progress. The minor changes will ensure that there will not be a decrease in quality of the development but will allow the scheme to come forward and provide much needed homes for Camden residents.
- 1.4 Paragraph 62 of the DCLG Guidance 'Greater flexibility for planning permissions' (2010) states that:
- “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.”***
- Given the limited nature of the changes to the scale and nature of the development, it will not be substantially different from the one which has been approved.
- 1.5 The majority of changes result in small amendments to the positioning of fenestration in order to facilitate the change in mix. The change to the mix is considered to be minor in nature, 3 additional social units are provided and 1 additional market unit is provided. The proposed amendments also provide additional cycle storage.
- 1.6 The application comprises of the following information in line with the Council's validation requirements:

- Application Forms, duly completed;
- Council Own Development Form;
- Planning permission ref. 2012/6338/P;
- Site Location Plan;
- Approved plans (as listed in Appendix 1);
- Proposed plans for approval (Revision P9 and P11, as listed in Appendix 1);
- Marked up plans to highlight where minor amendments have been made (Revision P8 and P10);
- This Planning Statement;
- Energy Strategy;
- Sunlight and Daylight Report;
- Temporary heating unit details;
- Waste Storage and Cycle Storage details; and
- Cheque for £195 in payment of the relevant fee.

1.7 Under Article 8(1)(a) of the DMPO 2010, a Design and Access Statement is not required to support an application to develop land without compliance with conditions previously attached (i.e. applications made under Section 73). On this basis, a Design and Access Statement has not been prepared.

2 PRE-APPLICATION CONSULTATION

- 2.1 Pre-application discussions with the local planning authority took place in October 2013. At this stage the local authority were requested to comment on a change in unit mix within blocks A and B1, the addition of three social rented units, associated changes to the elevations to facilitate this change in mix, window/balcony changes within phases 2 and 3 and the retention of the care takers cottage. Additional details can be found in the pre-application feedback which can be found at Appendix 7.
- 2.2 The discussions confirmed that the planning officers consider that within the context of the original permission at the site, the proposed changes were considered as minor material amendments. The principle of altering the unit mix in Blocks A and B1 was not anticipated to be of a significant level.
- 2.3 The pre-application discussions illustrated that officers do not consider there to be fundamental concerns over the design amendments proposed.
- 2.4 Since the pre-application discussion in October 2013 the application proposals now include a further residential unit between Blocks B1 and C however changes are no longer sought to phases 2 and 3.
- 2.5 During the pre-application discussions in October 2013 officers raised concerns over proposals to retain the care takers cottage. Following these comments, this minor material amendment application no longer seeks the retention of the care takers cottage.

3 PROPOSED DEVELOPMENT

- 3.1 The proposed minor amendments discussed in more detail below require the variation of Conditions 9 and 58 respectively.

a) **Variation of Condition 9**

- 3.2 This Section 73 Minor Material Amendment Application seeks to vary Condition 9 of planning permission 2012/6338/P. Condition 9 current reads as follows:

"Before development commences, other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition, detailed plans indicating the type and layout of secure and covered cycle storage facilities for 392 cycles shall be submitted to and approved by the local planning authority in writing. The approved facilities shall thereafter be provided in their entirety prior to the first occupation of each respective part of the development, and permanently retained thereafter."

- 3.3 It is proposed that the condition is modified as follows:

*"Before **the relevant part of the** development commences, other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition, detailed plans indicating the type and layout of secure and covered cycle storage facilities for **398** cycles shall be submitted to and approved by the local planning authority in writing. The approved facilities shall thereafter be provided in their entirety prior to the first occupation of each respective part of the development, and permanently*

- 3.4 It is proposed to vary condition 9 so the architect does not have to provide the comprehensive cycle storage details for a scheme that will be changed by this minor amendment application, resulting in abortive work.

b) **Variation of Condition 58**

3.5 Condition 58 of planning permission 2012/6338/P currently reads as follows:

“The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Plan dated 21/11/2012; 202_A_P_001_00; 202_A_P_010_00; 202_A_D_100_001; 202_A_P_003_01; 202_A_P_003_02; 202_A_P_003_03; 202_A_P_DHO_100_00 Rev 1; 202_A_P_DHO_100_01 Rev 01; 202_A_P_DHO_100_02 Rev 01; 202_A_P_DHO_100_03 Rev 01; 202_A_P_DHO_100_04 Rev 01; 202_A_P_DHO_100_05 Rev 01; 202_A_P_DHO_06 Rev 01; 202_A_P_DHO_100_07 Rev 01; 202_A_P_DHO_100_08 Rev 01; 202_A_P_DHO_200_01 Rev 01; 202_A_P_DHO_200_02 Rev 01; 202_A_P_DHO_200_03 Rev 01; 202_A_P_DHO_300_00 Rev 01; 202_A_P_DHO_300_01; 202_A_P_DHO_300_02 Rev 01; 202_A_P_DHO_300_03; 202_A_P_DHO_300_04 Rev 01; 202_A_P_DHO_400_01; 202_A_P_BLR_100_B01; 202_A_P_BLR_100_00 Rev 01; 202_A_P_BLR_100_01; 202_A_P_BLR_100_02; 202_A_P_BLR_100_03; 202_A_P_BLR_100_04; 202_A_P_BLR_100_05; 202_A_P_BLR_100_06; 202_A_P_BLR_100_07; 202_A_P_BLR_100_08; 202_A_P_BLR_200_01; 202_A_P_BLR_200_02 Rev 01; 202_A_P_BLR_200_03; 202_A_P_BLR_200_04; 202_A_P_BLR_200_05; 202_A_P_BLR_300_00; 202_A_P_BLR_300_01; 202_A_P_BLR_300_02; 202_A_P_BLR_300_03; 202_A_P_BLR_300_04; 202_A_P_BLR_300_05; 202_A_P_BLR_300_06; 202_A_P_BLR_400_01; 202_A_P_DHO_110_001 Rev 01; 202_A_P_DHO_110_002; 202_A_P_DHO_110_006; 202_A_P_DHO_110_007; 202_A_P_DHO_110_008; 202_A_P_DHO_110_009; 202_A_P_DHO_110_010 Rev 02; 202_A_P_DHO_110_011; 202_A_P_DHO_110_012; 202_A_P_DHO_110_013 Rev 02; 202_A_P_DHO_110_014; 202_A_P_DHO_110_015 Rev 02; 202_A_P_DHO_110_016; 202_A_P_DHO_110_017; 202_A_P_DHO_110_018; 202_A_P_DHO_110_019 Rev 01; 202_A_P_DHO_110_020; 202_A_P_DHO_110_021; 202_A_P_BLR_110_001; 202_A_P_BLR_110_002; 202_A_P_BLR_110_003; 202_A_P_BLR_110_004; 202_A_P_BLR_110_005; 202_A_P_BLR_110_006; 202_A_P_BLR_110_007; 202_A_P_BLR_110_008; 202_A_P_BLR_110_009; 202_A_P_BLR_110_010; 202_A_P_BLR_110_011; 202_A_P_BLR_110_012; 202_A_P_BLR_110_013; 202_A_P_BLR_110_014; 202_A_P_BLR_110_015; 202_A_P_BLR_110_016; 202_A_P_BLR_110_017; 202_A_P_BLR_110_018; 202_A_P_BLR_100_019; 202_A_P_BLR_100_020; 202_A_P_BLR_100_021; 202_A_P_BLR_100_022; 202_A_P_BLR_100_023; 202_A_P_BLR_100_024; 202_A_P_BLR_100_025; 202_A_P_BLR_100_026; 202_A_P_BLR_100_027; 202_A_P_BLR_100_028; 202_A_P_BLR_200_030; 202_A_P_BLR_200_031; 202_A_P_BLR_200_032; 202_A_P_BLR_200_033 Rev 01; 202_A_P_BLR_300_034; 202_A_P_BLR_300_035; 202_A_P_200_036; 202_A_P_BLR_200_040; 202_A_P_BLR_200_049; 202_A_P_BLR_200_050; 202_A_P_BLR_200_051 Rev 01; 202_A_P_BLR_200_052; 202_A_P_BLR_300_064; 202_A_P_BLR_300_065; 202_A_P_BLR_200_067; 202_A_P_BLR_200_068; 202_A_P_BLR_200_069; 202_A_P_BLR_200_070; 202_A_P_BLR_200_071; 202_A_P_BLR_200_072; 202_A_P_BLR_200_073; 202_A_P_BLR_300_074; 202_A_P_BLR_300_075; 202_A_P_BLR_300_075; 202_A_P_BLR_200_076; 202_A_P_BLR_200_077; 202_A_P_BLR_200_078; 202_A_P_BLR_200_079; LL439_C_SP_001 Rev J; LL439_C_SP_002 Rev K; LL439_C_SP_003 Rev D; LL439_C_SP_004 Rev B; LL439_C_SP_009”

3.6 This condition is proposed to be modified as follows:

“The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Plan dated 21/11/2012; 202_A_P_001_00; 202_A_P_010_00; 1952_DHO_L00_LVL_P9; 202_A_P_003_01; 202_A_P_003_02; 202_A_P_003_03; 1952_DHO-L00_P9; 1952_DHO-L01_P9; 1952_DHO-L02_P9; 1952_DHO-L03_P9; 1952_DHO-L04_P9; 1952_DHO-L05_P9; 1952_DHO-L06_P9; 1952_DHO-L07_P9; 1952_DHO-R08_P9; 1952_DHO-S-00_P9; 1952_DHO-S-01_P9; 1952_DHO-S-03_P9; 1952_DHO_E-00_P11; 1952_DHO-E-01_P9; 1952_DHO-E-02_P11; 1952_DHO-E-03_P11; 202_A_P_DHO_300_04 Rev 01; 202_A_P_DHO_400_01; 202_A_P_BLR_100_B01; 202_A_P_BLR_100_00 Rev 01; 202_A_P_BLR_100_01; 202_A_P_BLR_100_02; 202_A_P_BLR_100_03; 202_A_P_BLR_100_04; 202_A_P_BLR_100_05; 202_A_P_BLR_100_06; 202_A_P_BLR_100_07; 202_A_P_BLR_100_08; 202_A_P_BLR_200_01; 202_A_P_BLR_200_02 Rev 01; 202_A_P_BLR_200_03; 202_A_P_BLR_200_04; 202_A_P_BLR_200_05; 202_A_P_BLR_300_00; 202_A_P_BLR_300_01; 202_A_P_BLR_300_02; 202_A_P_BLR_300_03; 202_A_P_BLR_300_04; 202_A_P_BLR_300_05; 202_A_P_BLR_300_06; 202_A_P_BLR_400_01; 202_A_P_DHO_110_001 Rev 01; 202_A_P_DHO_110_002; 202_A_P_DHO_110_006; 202_A_P_DHO_110_007; 202_A_P_DHO_110_008; 202_A_P_DHO_110_009; 202_A_P_DHO_110_010 Rev 02; 202_A_P_DHO_110_011; 202_A_P_DHO_110_012; 202_A_P_DHO_110_013 Rev 02; 202_A_P_DHO_110_014; 202_A_P_DHO_110_015 Rev 02; 202_A_P_DHO_110_016; 202_A_P_DHO_110_017; 202_A_P_DHO_110_018; 202_A_P_DHO_110_019 Rev 01; 202_A_P_DHO_110_020; 202_A_P_DHO_110_021; 202_A_P_BLR_110_001; 202_A_P_BLR_110_002; 202_A_P_BLR_110_003; 202_A_P_BLR_110_004; 202_A_P_BLR_110_005; 202_A_P_BLR_110_006; 202_A_P_BLR_110_007; 202_A_P_BLR_110_008; 202_A_P_BLR_110_009; 202_A_P_BLR_110_010; 202_A_P_BLR_110_011; 202_A_P_BLR_110_012; 202_A_P_BLR_110_013; 202_A_P_BLR_110_014; 202_A_P_BLR_110_015; 202_A_P_BLR_110_016; 202_A_P_BLR_110_017; 202_A_P_BLR_110_018; 202_A_P_BLR_100_019; 202_A_P_BLR_100_020; 202_A_P_BLR_100_021; 202_A_P_BLR_100_022; 202_A_P_BLR_100_023; 202_A_P_BLR_100_024; 202_A_P_BLR_100_025; 202_A_P_BLR_100_026; 202_A_P_BLR_100_027; 202_A_P_BLR_100_028; 202_A_P_BLR_200_030; 202_A_P_BLR_200_031; 202_A_P_BLR_200_032; 202_A_P_BLR_200_033 Rev 01; 202_A_P_BLR_300_034; 202_A_P_BLR_300_035; 202_A_P_200_036; 202_A_P_BLR_200_040; 202_A_P_BLR_200_049; 202_A_P_BLR_200_050; 202_A_P_BLR_200_051 Rev 01; 202_A_P_BLR_200_052; 202_A_P_BLR_300_064; 202_A_P_BLR_300_065; 202_A_P_BLR_200_067; 202_A_P_BLR_200_068; 202_A_P_BLR_200_069; 202_A_P_BLR_200_070; 202_A_P_BLR_200_071; 202_A_P_BLR_200_072; 202_A_P_BLR_200_073; 202_A_P_BLR_300_074; 202_A_P_BLR_300_075; 202_A_P_BLR_300_075; 202_A_P_BLR_200_076; 202_A_P_BLR_200_077; 202_A_P_BLR_200_078; 202_A_P_BLR_200_079; LL439_C_SP_001 Rev J; LL439_C_SP_002 Rev K; LL439_C_SP_003 Rev D; LL439_C_SP_004 Rev B; LL439_C_SP_009”

c) **Proposed Changes**

3.7 **Overall DHO site changes:**

- Overall there are 4 additional residential units (this comprises 1 additional private three bedroom unit between blocks B1 and C and 3 additional social units in Block B1).
- Overall, the unit mix has changed to better suit Camden's housing needs as follows:
 - Reduction of 5 X 1 beds
 - 3 X 5 beds
 - 1 X 6 bed
 - Addition of 6 X 2 beds
 - 6 X 3 beds
 - 1 X 4 bed
- Minor change to levels as shown on section drawings to suit detailed design process.
- Rain water pipe positions have been added on elevations.
- Reduction in storey heights –Ground to first floor will stay as originally designed with 3.225m min. floor to floor. Minimum floor to ceiling heights in all units above ground floor will be 2.5m throughout.
- Previously consented balustrades to Juliet balconies, recessed balconies and terraces were made from steel perforated panels, now proposed to change the balustrades so that they composed of opaque toughened glass and PCC steelwork frame. The colour and details are to be approved through the discharge of condition 3.
- Provision of temporary heating unit moved from between blocks B1 and C to the north of Phase 3. This is in the same location as the previously consented substation. The contractor has received confirmation from UKPN that this substation is not currently required due to sufficient capacity in the existing network. Please see accompanying plans and information.

3.8 To facilitate these minor changes the substitution of plans is as outlined in the schedule found in Appendix 1.

3.9 For a full schedule of changes, please see Appendix 7.

4 ANALYSIS

a) Housing Mix

- 4.1 Permission has been granted under 2012/6338/P for 114 affordable units, which equated to 46.8% of the total proposed residential floorspace in the scheme. Of the net additional affordable housing, 17 (63.0%) of the 27 units were to be social rented housing and 10 (37.0%) were as intermediate affordable housing.
- 4.2 The proposals under application 2012/6338/P were assessed against the Local Development Framework which comprised the National Planning Policy Framework (2012), the Core Strategy (2010) and Camden Development Policies (2010). The Local Development Framework has not since changed and therefore the application proposals will continue to be assessed against these policies.
- 4.3 The proposed minor amendment would alter the overall number of units from 290 to 294. These changes comprise of the addition of three social rent units resulting in changes in Block A and B1 and the addition of one private unit between Blocks B1 and C.
- 4.4 The proposed minor amendment would grant permission for 117 affordable units, which equates to 44.7% of the total proposed residential floorspace in the scheme. Of the net additional affordable housing, 107 of the units are to be social rented housing and 10 are to be intermediate affordable housing.
- 4.5 As requested during pre-application discussions with the Council, tables are provided in Appendix 2 which specifies the unit number, mix and floorspace figures. These compare the approved/ proposed figures in all instances, in order to clearly show the resultant minor changes.
- 4.6 It is considered that the application proposals are in line with policies CS6 of the Core Strategy (2010) and Policy DP2 and DP5 of Camden Development Policies (2010).

b) Design

- 4.7 To facilitate the change in mix as set out above, this application applies for small amendments to the position of fenestration. An assessment of planning policy confirms that these minor

amendments would not result in a scheme that is substantially different from the one which has been approved. Furthermore, pre-application discussions with the Council confirm that the proposed fenestration alterations appear unlikely to result in significantly greater amounts of overlooking than those approved and considered appropriate previously.

- 4.8 Included within this minor material amendment application is the revision of the balustrades of Juliet balconies, recessed balconies and terraces from mild steel perforated panels to opaque toughened glass and PCC steelwork frame. The details of which are to be approved through the discharge of condition 3.
- 4.9 Pre-application consultation was held with Camden Design Officer, Ed Jarvis, in February 2014 to discuss the change from perforated metal panels to glass. During these discussions it was the design officer's request that all perforated metal options were to be fully explored before a change to glass could be considered. Since these pre-application discussions the client side design team have worked hard to identify perforated metal options. From an early stage of this exercise it was clear that bespoke laser cut balustrades were not going to be an option as the manufacturing process is costly. From initial quotes we were finding that the procurement of these would be over budget for this package and subsequently we were forced to look at alternative ways for cutting the metal.
- 4.10 The most suitable option left open to the applicant was for perforated patterns formed using a dot matrix system. The standard sized perforations of varied diameter would be punched rather than laser cut which is a far more economical manufacturing process. We have identified that to create patterns which are not easy for small children to climb and yet are still robust enough to resist dents, we would need to use a panel which would have a much higher proportion of solid than of void.
- 4.11 The change to the balustrades has also arisen through resident consultation where strong preference was given to glass balustrades compared to the currently consented perforated metal balustrades. Whilst undertaking the exercise to reinvestigate options for the perforated metal panels we have consulted the resident community. We have explained the options that are affordable for the project. The residents are very concerned that these designs would substantially reduce the amount of natural light coming through their windows compared with the opaque glass

option. Moreover they have major concerns about the longevity of the material, they have suggested that the steel panels would create more of a maintenance issue for the Council as the panels may be liable to rust and deteriorate over time.

- 4.12 From an aesthetic point of view the residents prefer the opaque frameless glass solution. They have conveyed to the design team that they find the perforated metal far too brutal in appearance and not suited to a domestic environment. They are also concerned that the patterns will be too fussy and reduce the legibility of the facades.
- 4.13 As for the scheme approved under application ref 2012/6338/P, it is considered that the application proposals are in line with Policy CS14 of the Core Strategy (2010), Policy DP24 of Camden Development Policies (2010). The conclusions of the Officer's report would therefore still remain.
- 4.14 Fundamentally, there would be no significant difference in the external appearance of the building and the height, bulk, footprint and overall design approach to the building remains as previously approved.

c) Amenity

- 4.15 In respect to amenity, the Council will consider the proposals with regard to Policy CS5 of the Core Strategy (2010), Policy DP26 of Camden's Development Policies (2010) and also the guidance and advice contained within Camden Planning Guidance 6.
- 4.16 These policies have been fully taken into consideration during the process of applying for the proposed minor amendments to the scheme.
- 4.17 Pre-application comments from the Council (dated 08/10/13) raised amenity concerns regarding the positioning of the bin stores adjacent to Block A. The Applicant has taken on board these comments and accordingly has revised the scheme. GVA, the Applicant's sunlight and daylight consultants has reviewed the plans and note that due to the proposed amendments there "will be an overall improvement in the daylight received in the ground floor flat in Block A."
- 4.18 With regard to the additional unit located between block B1 and C, the applicant's sunlight and daylight consultant has provided confirmation that the "design, size and general window

specification for the revised layout are not materially different from the rooms tested in our previous analysis and it is therefore clear that the north facing bedrooms that have an outlook onto the railway embankment will comfortably satisfy the target design standards in the British Standards Code of Practice...there is no doubt that the internal lighting conditions within that open plan L/K/D will be very high, and well above the target design standards”.

- 4.19 The applicant’s sunlight and daylight consultant has also confirmed that “the minor changes to the general massing of the blocks and the minor detail changes to the window design and room layouts...none of those changes will result in any material difference to the impact on the existing neighbouring dwellings and on balance, there will in fact be a minor net improvement”.

d) Sustainability

- 4.20 The applicant’s sustainability consultants, Rolton, have updated the Energy Strategy for the proposals. They confirm that the revised energy strategy takes into account the changes to the scheme both in terms of the additional dwellings and additional design development. Rolton confirm that “the net effect of these changes is an overall reduction in the energy use/CO₂ emissions from the scheme (both in terms of tonnes of CO₂ and as a percentage of the baseline scheme” compared to the original energy strategy”. Please find the revised Energy Strategy enclosed with this application. It has been confirmed that the proposed minor changes will not impact on the scheme’s ability to meet Code for Sustainable Homes Level 4.
- 4.21 As set out in Policy DP22 of the Camden Development Policies DPD (2010) the LPA requires development to incorporate sustainable design and construction measures. Schemes must demonstrate how sustainable development measures have been incorporated into the design and proposed implementation. In line with this policy the flat roofs associated with the bin stores and new unit at the ends of Block B1) will be biodiverse living roofs.

e) Cycle Parking

- 4.22 Table 6.3 of the London Plan Revised Early Minor Alterations (2013) sets out the cycle standards required as 1 space per 1 or 2 bed unit and 2 spaces per 3 or more bed unit and one space per 40 units for visitors. Appendix 2 of Camden Development Policies DPD (2010) outlines parking standards for C3 Residential Development. This states that residential units are required to provide

1 storage or parking cycle space per unit. The previously approved application sought to provide 392 cycle parking spaces. To take into account the additional units, the proposal seeks to provide 398 cycle spaces. This has been calculated as below:

No. of bedrooms	Number at that size	Cycle parking required
1	75	75
2	124	124
3	81	162
4	11	22
5	3	6

Employment Floorspace	Cycle parking required
259.31sqm	1.7

Visitor parking cycle parking required	7.3
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Total	398
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4.23 The proposal therefore ensures that the required number of appropriately designed cycle parking spaces, as set out in the London Plan, is still provided. For consistency this requires Condition 9 to be amended as described above.

4.24 Details of the cycle storage will be provided through the discharge of condition 9 following approval of this minor material amendment application.

f) Waste Storage

4.25 Alan Camp Architects have assessed the waste storage facilities to ensure that the facilities are sufficient when taking into account the additional four units. Please find their assessment as a standalone document in support of this application. Their assessment confirms that the provision made for waste storage on the DHO site will be appropriate for the number of units. Further details regarding waste strategy will be submitted to discharge condition 7 following the approval of this minor material amendment application.

g) Shadow Section 106

4.26 It is considered that a deed of variation to the Shadow Section 106 Legal Agreement will be required to be undertaken. This will need to accurately reflect the updated plans/documents submitted as part of this application.

4.27 In addition, the definitions included within the Shadow Section 106 will need to be updated accordingly. It is proposed that a Deed of Variation will be progressed with the Council when this minor material amendment application has been validated.

4.28 The shadow S106 contributions that have been paid to date are as follows:

- Legible London Contribution;
- Community Facilities Contribution;
- Public Open Space Contribution;
- Highways Works Contribution;
- Education Contribution;
- Travel Plan Review Contribution;

h) Mayoral Community Infrastructure Levy (CIL)

4.29 As raised in pre-application discussions with the Council, given that there is an amendment to the floorspace proposed this may result in the Mayoral CIL contribution being altered. The GIA floorspace of the proposed scheme is 32,250.11m² (compared to 31,976.13m² in the consented scheme). A CIL Additional Information Requirement form has been submitted with the application.

i) Environmental Impact Assessment

4.30 In accordance with the EIA Regulations (2011), a screening appraisal and request assessed the potential for environmental effects based on scale, mass and building footprint of the proposed development, including maximum floorspace of residential uses. The appraisal at the screening

stage is typically based on the anticipated broad design principles and does not go into the level of detail such as the treatment of windows and the detailed unit mix.

- 4.31 The screening appraisal and request submitted on 31 July 2012 concludes that the potential environmental effects associated with traffic, air emissions, noise, waste, pollution, flooding, ground conditions, microclimate, ecology, socio-economic, visual and physical changes resulting from the proposed development are not anticipated to be significant and no further stage of EIA is required. The original conclusions of the screening appraisal remain valid for the amended proposals at Bacton Low Rise.
- 4.32 For avoidance of doubt, a screening opinion request was submitted to London Borough of Camden on 25 April 2014 to confirm that they agree that no EIA is required in this instance. On 29 April 2014, the London Borough of Camden confirmed that an EIA is not required.

5 CONCLUSION

- 5.1 The proposed modifications to Conditions 9 and 58 attached to planning permission 2012/6338/P cause no harm in planning terms. There would be no significant difference in the external appearance of the building and the height, bulk, footprint and overall design approach to the building remains as previously approved. It is also considered that the proposed changes deliver minor benefits. Accordingly, it is considered that the scale and nature of the development is not substantially different from the one which has been approved.
- 5.2 We trust the enclosed is sufficient for you to validate the application and we look forward to receiving confirmation of this in due course. If for any reason this is not the case, please contact us immediately.

APPENDIX 1

	Plan approved under 2012/6338/P (dwg number and title)	Revised plan to be substituted (dwg number and title)
1.	202_A_P_DHO_100_00_Rev_01 DHO Site Proposed Ground Floor Plan	1952_DHO-L00 P9 DHO Site Proposed Ground Floor Plan
2.	202_A_P_DHO_100_01_Rev_01 DHO Site Proposed First Floor Plan	1952_DHO-L01 P9 DHO Site Proposed First Floor Plan
3.	202_A_P_DHO_100_02_Rev_01 DHO Site Proposed Second Floor Plan	1952_DHO-L02 P9 DHO Site Proposed Second Floor Plan
4.	202_A_P_DHO_100_03_Rev_01 DHO Site Proposed Third Floor Plan	1952_DHO-L03 P9 DHO Site Proposed Third Floor Plan
5.	202_A_P_DHO_100_04_Rev_01 DHO Site Proposed Fourth Floor Plan	1952_DHO-L04 P9 DHO Site Proposed Fourth Floor Plan
6.	202_A_P_DHO_100_05_Rev_01 DHO Site Proposed Fifth Floor Plan	1952_DHO-L05 P9 DHO Site Proposed Fifth Floor Plan
7.	202_A_P_DHO_100_06_Rev_01 DHO Site Proposed Sixth Floor Plan	1952_DHO-L06 P9 DHO Site Proposed Sixth Floor Plan
8.	202_A_P_DHO_100_07_Rev_01 DHO Site Proposed Seventh Floor Plan	1952_DHO-L07 P9 DHO Site Proposed Seventh Floor Plan
9.	202_A_P_DHO_100_08_Rev_01 DHO Site Proposed Roof Plan	1952_DHO-R08 P9 DHO Site Proposed Roof Plan
10.	202_A_P_DHO_200_01_Rev_01 DHO Site Proposed Section A-A B-B	1952_DHO-S-00 P9 DHO Site Proposed Section A-A B-B
11.	202_A_P_DHO_200_02_Rev_01 DHO Site Proposed Section C-C	1952_DHO-S-01 P9 DHO Site Proposed Section C-C
12.	202_A_P_DHO_200_03_Rev_01 DHO Site Proposed Section D-D E-E	1952_DHO-S-03 P9 DHO Site Proposed Section D-D E-E
13.	202_A_P_DHO_300_00_Rev_01 DHO Site Proposed Block A Elevation	1952_DHO-E-00 P11 DHO Site Proposed Block A Elevation
14.	202_A_P_DHO_300_01_Rev_00 DHO Site Proposed Block B1 Elevation	1952_DHO-E-01 P9 DHO Site Proposed Block B1 Elevation
15.	202_A_P_DHO_300_02_Rev_01 DHO Site Proposed Block B2 Elevation	1952_DHO-E-02 P11 DHO Site Proposed Block B2 Elevation
16.	202_A_P_DHO_300_03_Rev_00 DHO Site Proposed Block C Elevation	1952_DHO-E-03 P11 DHO Site Proposed Block C Elevation
17.	202_A_P_100_001_Rev_00 Proposed Site Levels Plan	1952_DHO_L00_LVL P9 Proposed Site Levels Plan

Note: drawings not listed are not intended to be superseded

APPENDIX 2

The unit mix of the three tenures is as follows:

	Approved No of 1 Beds	Proposed No of 1 Beds	Approved No of 2 Beds	Proposed No of 2 Beds	Approved No of 3 Beds	Proposed No of 3 Beds	Approved No of 4 Beds	Proposed No of 4 Beds	Approved No of 5 Beds	Proposed No of 5 Beds	Approved No of 6 Beds	Proposed No of 6 Beds	Approved No of Total Beds	Proposed No of Total Units
Market	64	64	76	76	31	32	5	5	0	0	0	0	176	177
Intermediate	0	0	0	0	10	10	0	0	0	0	0	0	10	10
Social Rent	14	9	45	51	34	39	5	6	5	2	1	0	104	107
Total	78	73	121	127	75	81	10	11	5	2	1	0	290	294

APPENDIX 3

Unit mix by percentage

No. of bedrooms	Approved Social (No Dwellings/%)	Proposed Social (No Dwellings/%)	Approved Intermediate (No Dwellings/%)	Proposed Intermediate (No Dwellings/%)	Approved Market (No Dwellings/%)	Proposed Market (No Dwellings/%)
1 bed	14 (13.5%)	9 (8.4%)	0 (0%)	0 (0%)	64 (36.4%)	64 (36.2%)
2 bed	45 (43.3%)	51 (47.6%)	0 (0%)	0 (0%)	76 (43.2%)	76 (42.9%)
3 bed	34 (32.7%)	39 (36.4%)	10 (100%)	10 (10%)	31 (17.6%)	32 (18.1%)
4 bed +	11 (10.6%)	8 (7.5%)	0 (0%)	0 (0%)	5 (2.8%)	5 (2.8%)
Total	104 (100%)	107 (100%)	10 (100%)	10 (10)	176 (100%)	177 (100%)

APPENDIX 4

Uplift of provision by tenure and unit:

	Existing No of Dwellings/ %	Overall approved total No. of dwellings /%	Overall proposed total No. of dwellings/ %	Uplift total No. of dwellings from existing to approved /%	Uplift total No. of dwellings from existing to proposed / %
Market	12 (12.1%)	176 (60.7%)	177 (60.2%)	164 (86%)	165 (85%)
Affordable (social rent and intermediate combined)	87 (87.9)	114 (39.3%)	117 (39.8%)	27 (14%)	30 (15%)
Total	99 (100%)	290 (100%)	294 (100%)	191 (100%)	195 (100%)

APPENDIX 5

Tenure mix by floorspace (GIA):

	Existing total Floorspace m ² (GIA) / %	Approved total Floorspace m2 (GIA) / %	Proposed total Floorspace m2 (GIA)/%	Uplift total Floorspace from existing to approved m ² (GIA) / %	Uplift total Floorspace from existing to proposed m ² (GIA) / %
Market	1,701 (12%)	17,811.11 (55.7%)	17,842.47 (55.3%)	16,110.11 (90.7%)	16,141.47 (89.5%)
Affordable (social rent and Intermediate Combined)	12,509.1 (88%)	14,165.02 (44.3%)	14,404.64 (44.7%)	1,655.92 (9.3%)	1,895.54 (10.5%)
Total	14,210.1 (100%)	31,976.13 (100%)	32,250.11 (100%)	17,766.03 (100%)	18,037.01 (100%)

Notes to explain revised floorspace figures:

Block A:

The GIA area has increased by around 95sqm to reflect the internal reconfiguration and the repositioning of the refuse stores.

Block B1:

The GIA area has increased by around 242sqm to reflect the 'splay' infill at either end of the terrace along with the additional floor space due to the 3rd floor reconfiguration.

Block B2:

The GIA areas have been 'corrected' (reduced) by around 95sqm to reflect the reduction in height and reconfiguration on 08.02.13 during the planning process of the original application.

Block C:

The GIA area has increased by around 32sqm due to the conversion of the plant room to ground floor unit between Block C and B1.

APPENDIX 6

Affordable tenure split by social rent and intermediate units by floorspace (NIA) and unit numbers, both in overall terms and uplift at the site:

	Existing affordable units		Overall affordable units approved total		Overall affordable units proposed total		Uplift affordable units between existing and proposed total	
	No. of dwellings	Floorspace sqm NIA	No of dwellings	Floorspace sqm NIA	No of dwellings	Floorspace sqm NIA	No of dwellings	Floorspace sqm NIA
Social rent	87 (100%)	10,007.28 (100%)	104 (91.2%)	10,118.65 (89.5%)	107 (91.5%)	10,118.56 (89.5%)	20 (66.6%)	111.28
Intermediate	0 (0%)	0 (0%)	10 (8.8%)	1,183.14 (10.5%)	10 (8.5%)	1,183.1 (10.5%)	10 (33.3%)	1,183.1
Total	87 (100%)	10,007.28 (100%)	114 (100%)	11,301.79 (100%)	117 (100%)	11,301.66 (100%)	30 (100%)	1,400.68

APPENDIX 7

Schedule of Changes

Location of proposed minor change	Description of proposed minor change
Overall DHO Site Changes	<ul style="list-style-type: none"> ▪ Levels amended to suit detailed landscaping design - very minor impact on levels as shown on sections. ▪ Rain water pipe positions have been added on elevations. ▪ Reduction in storey heights –Ground to first floor will stay as originally designed with 3.225m min. floor to floor. Minimum floor to ceiling heights in all units above ground floor will be 2.5m throughout. ▪ Previously consented balustrades to Juliet balconies, recessed balconies and terraces were made from steel perforated panels, now proposed to change the balustrades so that they composed of opaque toughened glass and PCC steelwork frame. The colour and details are to be approved through the discharge of condition 3. ▪ Overall there are 4 additional residential units (as explained below, this comprises 1 additional private three bedroom unit between blocks B1 and C, 3 additional social units in Block B1). ▪ Overall, the unit mix has changed to better suit Camden’s housing needs as follows: <ul style="list-style-type: none"> Reduction of 5 X 1 beds <ul style="list-style-type: none"> 3 X 5 beds 1 X 6 bed Addition of 6 X 2 beds <ul style="list-style-type: none"> 6 X 3 beds 1 X 4 bed ▪ Provision of temporary heating unit moved from between blocks B1 and C to the north of Phase 3. This is in the same location as the previously consented substation. The contractor has received confirmation from UKPN that this substation is not currently required due to sufficient capacity in the existing network. Please see accompanying plans and information.

Block A	<p><u>General</u></p> <ul style="list-style-type: none"> ▪ Minor revision to extents of building to facilitate revised unit mix– movement of southeast and southwest facades by circa 500mm. ▪ Changes to window articulation as identified on east elevation to facilitate revised unit mix. ▪ Position of projecting balconies on street façade altered –Moved to centre of southwest facade ▪ Windows added and altered on street façade and south elevation but generally window format, size and profile match those of consented scheme. ▪ Window types altered on north façade, generally window format, size and profile match those of consented scheme. ▪ A reduction of 5 X one bed social units. ▪ An addition of 5 X two bed social units. ▪ No change to the total number of units in Block A. Please see accommodation schedule and tables in Appendix 2-6. <p><u>Ground Floor</u></p> <ul style="list-style-type: none"> ▪ Ground floor entrance plan amended to increase width of secured undercroft entrance to courtyard gardens. Bin stores relocated from block A to between blocks A and B1. ▪ Ground floor recessed terraces revised –Terrace moved to south east corner to facilitate revised unit mix.
Block B1	<p><u>General</u></p> <ul style="list-style-type: none"> ▪ Minor revisions to extents of building - Previous ‘chamfered corners’ at either end of courtyard façade squared off to facilitate revised unit mix and to suit detailed landscape design. ▪ Elevations generally revised to facilitate new mix and create more rhythm within the north and south façades. Maisonettes and townhouses defined as such through building articulation on courtyard façade. Overall appearance of façade articulation is in keeping with consented scheme. ▪ Individual window format, size and profile to south facade match those shown on consented scheme. Windows to north façade altered following detailed façade design for acoustic purposes. ▪ Addition of 1 two bed social unit. ▪ Addition of 5 three bed social units. ▪ Addition of 1 four bed social units. ▪ Reduction of 3 five beds social units. ▪ Reduction of 1 six bed social unit. ▪ Overall there would be 3 no. more social units in Block B1. Please see accommodation schedule and tables in Appendix 2-6.

	<p><u>Ground Floor</u></p> <ul style="list-style-type: none"> Single storey refuse and bike enclosure between Blocks A and B1 to create perimeter edge to courtyard gardens and remove hidden zones which have poor passive surveillance. <p><u>Third Floor</u></p> <ul style="list-style-type: none"> 3rd floor terrace extents revised following replacement of townhouses with stacked maisonettes –The B1 terraced block is made up of 13 bays. Previously there were 7 townhouse ‘bays’ with full roof terraces at 3rd floor and 6 maisonette ‘bays’ with smaller terraces accessed from the 3rd floor living area. There are now 4 townhouse bays located at the centre of the block, and 9 maisonette bays which are located either side. Subsequently there is now more solid than void at the 3rd floor level, however this is not clearly identifiable from the street level as a similar elevation articulation is used to that of the consented scheme. Original feature hit and miss brickwork at 3rd floor replaced by ‘picture windows’ – following the original planning consent further consultation with the residents and the client led the design team to understand that the B1 facades needed to be more open in nature. The ‘picture windows’ would allow activity on the roof terraces to be more visible from the courtyard spaces reinforcing the principle that the development encourages activity at every level. These ‘picture window’ openings would also encourage more light onto these terrace spaces and improve connectivity between the communal and private amenity spaces.
Block B2	<ul style="list-style-type: none"> Placement and size of windows altered. Recessed brickwork panels added to aid articulation of facades.
Block C	<ul style="list-style-type: none"> Removal of temporary plant room sitting between north and east elevations at ground floor. Addition of ground and first floor lobby windows to the north elevation to facilitate smoke ventilation extract in an emergency. Vertical cuts made in recessed balcony wall to north east elevation. 1 Window removed and replaced with recessed brickwork due to internal configuration of private stair. Changes to north and west elevations as a result of single storey addition on side of Block B1. Changes to windows at ground and first floor of west elevation as a result of changes to levels. Width of recessed balconies increased on west elevation Four windows added to north façade to give more light to communal stair core. Windows to north façade altered following detailed façade design for acoustic purposes. Windows to east façade altered following detailed façade design for acoustic purposes.

APPENDIX 8

Date: 07/10/2013
Our Ref: 2012/6338/P
Contact: Jonathan Markwell
Direct Line: 020 7974 2453
Email: Jonathan.Markwell@camden.gov.uk

**Development Management
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Poppy Carmody-Morgan
Quod
Ingeni Building
17 Broadwick Street
London
W1F 0AX

Dear Poppy Carmody-Morgan

Planning Pre-application advice note

Planning enquiry regarding: Land bounded by Haverstock Road, Wellesley Road and Vicar's Road including Nos 121-211 Bacton Low Rise Estate, 113a, 115 and 117 Wellesley Road and 2-16 Vicar's Road, Gospel Oak, London, NW5 4

Pre application advice on amendments to planning permission 2012/6338/P

Context & Proposals

Planning permission (2012/6338/P) was granted following the completion of a Shadow S106 Legal Agreement on 25/04/2013 for:

Redevelopment of Bacton Low Rise Estate, Gospel Oak District Housing Office and Vicar's Road workshops following the demolition of all existing buildings (99 Class C3 residential units Nos. 121-219 Bacton Low Rise; Class B1 offices at 115 Wellesley Road; Class B1 workshops at 2-16 Vicar's Road), to provide within buildings ranging from 2-8 storeys in height a total of 290 Class C3 residential units, comprising 176 market, 10 intermediate and 104 social rent units, 3 employment units (Class B1), new and altered public realm, landscaping, vehicular and pedestrian links/accesses, vehicular and cycle parking, bin storage and associated works.

This permission is presently in the process of being implemented, but a number of amendments are now sought following design development and changes in the housing needs of existing Camden residents. The changes are detailed within the covering letter submitted with this enquiry, and complemented by a series of marked up plans. For completeness, the proposed changes you have outlined are as follows:

1. A change to the approved mix of the scheme as follows:

DHO Site

Block A

Ground floor - Replacement of 1 no. 1 bed with 1 no. 2 bed
1st floor – Replacement of 1 no. 2 bed, 4 person, with 1 no. 2 bed 3 person
2nd floor – replacement of 1 no. 2 bed, 4 person, with 1 no. 2 bed 3 person
2nd floor – replacement of 2 no. 1 bed, with 2 no. 2 bed
No change to the total number of units

Block B1

Ground floor – 2 additional 3 bed, 1 additional 4 bed, 2 less 5 bed, 1 less 6 bed

2nd floor – 3 additional 3 bed

Overall there would be 3 more units

2. Changes to elevations as follows:

Block	Elevation	Proposed Minor Amendment
A	West	One additional strip of windows added and minor change in position of balconies to reflect change in mix.
A	South	Minor change to window positioning.
A	-	Elevations generally adapted to suit new mix.
B1	-	Changes to elevations to reflect reduction of townhouses and replacement with more maisonettes.
B1	North	Changes to fenestration details to replace fixed windows with side hung, triple glazed and minor relocation of window positions to reflect change in mix.
B2	South	Minor amendments to windows.
C	North	Windows replaced with side hung triple glazed (previously fixed). One additional strip of windows added (3 windows).
C	North East	One window removed.
C	East	Minor amendments to windows.

3. Single storey additional buildings

Inclusion of single storey brick connecting buildings in place of previous brick wall/balustrade and landscaping.

4. Flue

Inclusion of temporary boiler flue on Block C for removal at the end of Phase 1.

BLR Site**5. Changes to elevations as follows:**

Block	Elevation	Minor Amendment
D&E	Internal North	Addition of two balconies at first floor, windows amended
D&E	Internal West	Removal of two windows- amendments to other windows
D&E	Internal South	Addition of one window and amendment of one window
D&E	Internal West	Windows amended, balcony added
D&E	East, South, West and Internal West	Windows amended
D&E	North	Removal of door and amendments to windows. Parts of the hit & miss brick work replaced with 'picture window' voids
D&E	Internal West and East Mews	Windows amended
F	Internal South	Addition of one window
F	South	Windows amended and hit & miss brick replaced with 'picture

		window' voids
F	Internal East	Windows amended
F	West	Windows amended
F	East	One additional strip on windows added.
F	North	One strip of windows removed and others amended

6. Other

Basement plan- grille to basement plant and bike store amended

Block D1- store added

Block E_H- Size of terrace amended

Roof lights amended between Block F3 and Block F H&M

7. Please note that there is no change to the unit mix in the BLR Site

Subsequent to this, a further request was made to ascertain “whether the groundskeepers cottage on the DHO site could be retained”. A single plan was submitted detailing this.

Whether the minor material amendment procedure can be considered?

It is considered, within the context of the original permission at the site, that the proposed changes can be submitted for consideration as a minor material amendment application. As to the appropriateness of the proposed changes, this is discussed in more detail below.

Land use

Based on your covering letter, it appears that these amendments have come about owing to the changing needs of Camden residents. It is advised that in order to justify the proposed amendments, a clear and detailed rationale is provided with any submission. This is the basis for the application and hence must be explained in full, in order to assist the justification.

From a land use perspective the main change appears to be that the overall number of units will alter from 290 to 293*. These changes will be exclusively within the social rent units of Blocks A and B1. In overall terms it would appear that the change in mix would be:

- a reduction of 3x1 bed, 2x5 bed and 1x6 bed units
- an addition of 3x2 bed, 5x3 bed and 1x4 bed units

* This is not including the ‘groundskeepers cottage’, which is presumed will be a single residential unit, but details of this have not been provided and hence is not referred in the figures stated.

This would alter the total number of social rent units from 104 to 107. The proposed mix would be 11x1, 48x2, 39x3, 6x4, 3x5 bed units. In terms of mix, the percentage of large (3 bed +) social rent units would increase from 43.3% to 44.9%. Such a change is not considered to be significantly different from that considered appropriate at the time of the application.

It is not clear what implications the proposed changes have in terms of the various floorspaces at the site, and resultant density, tenure and affordable housing matters. It is advised that, at the time of the application, commentary is submitted to explain such changes. It is clear that there will be changes, given that the footprint and extent of, for example, Block B1 is altering. To assist with the consideration of this at the time of any application, it is advised that all relevant tables of information included within the officer committee report (e.g. those within the analysis information and the assessment sections) is provided within your submission. This should compare the approved / proposed figures in all instances, in order to explicitly indicate the resultant changes. Without the submission of this information at this stage, it is not possible to conclusively comment as to whether such changes would be considered appropriate by officers. It is however anticipated that the changes are unlikely to be of a significant level. However, the justification to back up this likely view will need to be demonstrated by you.

Design

It is understood that my colleague Edward Jarvis has verbally discussed the proposed changes with Julia Farr (HASC), and does not raise any fundamental concerns with the amendments proposed.

One comment is that many of the marked up plans detail that the levels have been updated. If this results in the increase or reduction in height of the proposed scheme at any point, commentary to explain such changes should be provided.

Amenity

Some concerns are raised in respect of the potential negative impact the proposed changes may have:

- Likely poor access to daylight / sunlight and reduction in outlook (compared with approved), and resultant undue sense of enclosure / poor quality of accommodation, for future occupiers of the ground floor unit within Block A adjacent to the TRA Hall (owing to proposal for a Bin store at the rear in close proximity to the two rear rooms)
- The rationale for the temporary flue should be detailed, as well as precisely how long it will be required (so that this element can potentially be suitably controlled via condition to ensure its removal).
- The implications for the usability of the play space on the DHO site, as a result of the retention of the 'groundskeepers cottage'. Potential for overlooking at close quarters from the cottage to the open space and vice versa, negatively impacting on the quality of accommodation for future occupiers and quality of the open space at this point.
- Potential overlooking between the 'groundskeepers cottage' and the facing elevation of Block A (and vice versa). If this is sought to be overcome by obscure glazing, this may have negative consequences in terms of outlook and quality of accommodation.
- It is not clear why one of the two bin store doors serving blocks D1 and D2 has been removed? Would the provision of only a single door be sufficient, or would it reduce the potential for the spaces being used effectively? Clarification should be provided at the time of any application.

With regard to the fenestration alterations proposed, these appear unlikely to result in significantly greater amounts of overlooking than those approved and considered appropriate previously.

Other matters

Internal layouts – implications for lifetime homes and wheelchair housing

It would appear that amendments are sought to the internal layouts of the some of the approved units. You are advised of the wording of conditions 22 (lifetime homes) and 23 (wheelchair units) when making any alterations in these regards. It is likely that such alterations will facilitate details being required to satisfy these conditions.

Open space

Regarding the 'groundskeepers cottage', in addition to the amenity section comments above, the potential negative impact on the quantity/quality of the open space at this point is raised. The retention of the cottage would result in a substantial reduction in quantity, while an assessment on the qualitative impact cannot be made as this hasn't been detailed within your submission. My view is that the retention of the cottage would reduce the quantity and potentially the quality of the open space (acknowledged to be shared private amenity space). This may, in-turn, potentially lead to the entire open space at this point not serving the positive purposes it was intending to at the time of the original application. If the space is reduced in size/quality to such an extent that its function is diluted, it may not be used for the purposes intended and instead become a more difficult space to effectively manage. As such, reservations are made about the retention of the 'groundskeepers cottage' on this basis and you are advised to revisit this element of the proposals. In conclusion, there are considered to be a number of potential issues regarding the retention of the 'groundskeepers cottage'.

Sustainability

It is not clear whether the proposed changes would have in terms of the code for sustainable homes assessment or Energy Strategy. This should be discussed in any submission.

It is likely that officers would seek to ensure that the flat roofs associated with the bin stores (at either end of Block B1) would be biodiverse living roofs. This is in line with DP22b.

Cycle parking and waste storage

It will need to be demonstrated that sufficient additional cycle parking and waste storage facilities are provided to accommodate the increase in residential units proposed. This should be clearly demonstrated on the proposed plans

Shadow S106

Given the nature of the intended changes, it is considered inevitable that, at least, a deed of variation Shadow Section 106 Legal Agreement will be required to be secured. First, this will need to accurately reflect the updated plans/documents submitted as part of any application of this nature. It may be the case that a number

of the financial contributions (such as community facilities, open space and possibly education – depending on the tenure of the ‘groundskeepers cottage’) will need to be amended to take account of the change in overall number of units and mix proposed. Please refer to CPG8 for more details regarding calculating financial contributions.

In addition, some of the definitions (e.g. social rent units increasing from 104 to 107 – sections 2.3 and 2.65) will need to be updated accordingly.

Conditions

Owing to the change in mix and number of residential units, it may be that some conditions will also need to be amended accordingly. For example, the number of spaces for cycles may need to be altered (condition 9).

Condition 58 (list of approved plans) will need to be closely considered. Please see below, for your information, this condition in full:

The development hereby permitted shall be carried out in accordance with the following approved plans:

Site	Location	Plan	dated	21/11/2012;	202_A_P_001_00;	202_A_P_010_00;
202_A_D_100_001;		202_A_P_003_01;		202_A_P_003_02;	202_A_P_003_03;	
202_A_P_DHO_100_00	Rev 01;	202_A_P_DHO_100_01	Rev 01;	202_A_P_DHO_100_02	Rev 01;	
202_A_P_DHO_100_03	Rev 01;	202_A_P_DHO_100_04	Rev 01;	202_A_P_DHO_100_05	Rev 01;	
202_A_P_DHO_100_06	Rev 01;	202_A_P_DHO_100_07	Rev 01;	202_A_P_DHO_100_08	Rev 01;	
202_A_P_DHO_200_01	Rev 01;	202_A_P_DHO_200_02	Rev 01;	202_A_P_DHO_200_03	Rev 01;	
202_A_P_DHO_300_00	Rev 01;	202_A_P_DHO_300_01;		202_A_P_DHO_300_02	Rev 01;	
202_A_P_DHO_300_03;		202_A_P_DHO_300_04	Rev 01;	202_A_P_DHO_400_01;		
202_A_P_BLR_100_B01;		202_A_P_BLR_100_00	Rev 01;	202_A_P_BLR_100_01;		
202_A_P_BLR_100_02;		202_A_P_BLR_100_03;		202_A_P_BLR_100_04;		
202_A_P_BLR_100_05;		202_A_P_BLR_100_06;		202_A_P_BLR_100_07;		
202_A_P_BLR_100_08;		202_A_P_BLR_100_09;		202_A_P_BLR_100_10;		
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202_A_P_BLR_100_14;		202_A_P_BLR_100_15;		202_A_P_BLR_100_16;		
202_A_P_BLR_100_17;		202_A_P_BLR_100_18;		202_A_P_BLR_100_19;		
202_A_P_BLR_100_20;		202_A_P_BLR_100_21;		202_A_P_BLR_100_22;		
202_A_P_BLR_100_23;		202_A_P_BLR_100_24;		202_A_P_BLR_100_25;		
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202_A_P_BLR_100_29;		202_A_P_BLR_100_30;		202_A_P_BLR_100_31;		
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202_A_P_BLR_100_35;		202_A_P_BLR_100_36;		202_A_P_BLR_100_37;		
202_A_P_BLR_100_38;		202_A_P_BLR_100_39;		202_A_P_BLR_100_40;		
202_A_P_BLR_100_41;		202_A_P_BLR_100_42;		202_A_P_BLR_100_43;		
202_A_P_BLR_100_44;		202_A_P_BLR_100_45;		202_A_P_BLR_100_46;		
202_A_P_BLR_100_47;		202_A_P_BLR_100_48;		202_A_P_BLR_100_49;		
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202_A_P_BLR_100_374;						

C Design Development Supplementary Addendum to Planning Application Ref 202_A_REP_ADDENDUM_01 dated December 2012 by Karakusevic Carson Architects; Landscape Proposals by Camlins Rev A 08.02.2013 8th Revision dated 04/02/2013; Construction Management Plan by EC Harris; Planning Statement by Quod Ref Q30150 dated 22/11/2012; Bat Survey Report by Greengage Ref 550355mtJul12FV01_Bat_Survey dated January 2013; Ecological Extended Phase 1 Habitat & Protected Species Survey by Greengage Ref 550338MTJan13FV02_Phase1_Bacton dated January 2013; Daylight & Sunlight Report by GVA Schatunowski Brooks dated November 2012; Addendum Daylight & Sunlight Report by GVA Schatunowski Brooks dated November 2012; Second Addendum Daylight and Sunlight Report by GVA Schatunowski Brooks dated February 2013; Daylight Analysis Bacton Low Rise by GVA Schatunowski Brooks dated 28/02/13, as submitted 03/03/13;

BRE073, as submitted 03/03/13; Air Quality Assessment by Peter Brett Associates Ref 26572/004 Rev 01 dated 20/11/2012; Basement Impact Assessment Revision B by Rolton Group Limited Ref 12-0083 XRP007 dated February 2013; Requirements for Code for Sustainable Homes Level 4 by EC Harris; Energy Strategy Report by Rolton Group Limited Ref 12-0083 XRP004 dated November 2012; Flood Risk Assessment by Rolton Group Limited Ref 12-0083 XRP003 Rev A dated November 2012; Geotechnical and Geo-Environmental Report by Rolton Group Limited Ref 12-0083 XRP005 Rev A dated November 2012; Noise and Vibration Assessment by Peter Brett Associates Ref 26572/003R001 Rev 01 dated 22/11/2012; Sustainability Statement by EC Harris; Transport Assessment by Peter Brett Associates Ref Issue 1 Rev 1 dated 23/11/2012; Tree Survey, Implications Assessment and Constraints by Greengage Ref 550355MTSept12FV04_BS5837 dated November 2012; Email from Rolton Group Limited to Environment Agency dated 17/12/2012; Impact Assessment and Tree Removal - Addendum by Greengage, as received 12/02/2013; Dust Monitoring Protocol Technical Note by Peter Brett Associates Ref TN001A dated 07/02/2013; Response to LBC Comments on Transport Assessment by Peter Brett Associates Ref 001 dated 08/02/2013, as received 14/02/2013; Trip Generation Calculations - Residential Land Use, dated 08/02/13, as received 27/02/13; TRAVL - Average Trip Rate by Mode and Time, as received 27/02/13; Revised Trip Generation trips by mode and time, as received 27/02/13; Revised Trip Generation trips by time, as received 27/02/13; Email from Greengage dated 22/02/2013 and associated annotated photographs (x3), Tree Constraints Plan GRNGE-BCTLWRS-583707 and untitled Vicars Road RPZ plan; Email from Greengage dated 03/03/2013.

Reason: For the avoidance of doubt and in the interest of proper planning.

At the time of any future application you are advised to submit, alongside the application, schedules (following the format above) of:

- all approved plans/documents which will become superseded as a result of the proposed application
- all newly proposed plans/documents as part of the proposed application
- all approved plans/documents unaltered as a result of the proposed application, and, all newly proposed plans as part of the proposed application (this will become the replacement condition 58)

This will greatly assist in the application being processed as expediently as possible.

Consultation

The local planning authority will be required to undertake public consultation on any minor material amendment application at the site. This would comprise neighbour notification letters to those on and adjacent to the site, site notices and a press notice. You are strongly advised to, at the very least, inform local residents / groups who responded at the time of the original application, to the fact that a minor material amendment application will be forthcoming. This will assist in explaining the nature of the changes at an early stage, and ensuring that the application is not a surprise to third parties. It is assumed that many local groups are being updated by way of regular newsletters and updates on the Council's website. Perhaps third parties could be updated by these means? It is advised that there would be benefits to explaining

the proposed changes to as wide an audience as possible in advance of any submission.

EIA

As per paragraph 70 of the Greater Flexibility for Planning Permissions guidance note, it is advised that an EIA screening opinion is sought by you to the local planning authority. This should be submitted separately, and in advance, of any minor material amendment application.

Mayoral CIL

Given there will be a change in the floorspaces involved, this may result in the Mayoral CIL contribution being altered. You are advised to be aware of this prior to any submission (although it may in part be covered by social housing relief).

Further changes

It is advised, as far as possible, that all changes which you are seeking to make to the scheme should be made in a single application. This local planning authority would not encourage a succession of this type of application.

Concluding comments

It is advised that the majority of amendments appear to be minor in nature and are likely to be considered appropriate. However, there are several areas where further justification will be required and other elements where refinement should be incorporated into any proposal. Most notably, some amenity concerns are raised and the impact of the retention of the 'groundskeepers cottage' on the approved open space should be re-evaluated.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Prior to submitting any application you should also read the guidance from the following links for submitting a valid application and national/local requirements:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/;jsessionid=0A413F62C5C5AEC5D4C7F21C3E1FA7DC>

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements-/>

If you have any queries about the above letter please do not hesitate to contact **Jonathan Markwell** on **020 7974 2453**.

Thank you for using Camden's pre-application advice service.

Yours sincerely

(sent via email)

Jonathan Markwell

Principal Planning Officer – Development Management East Area Team