



**GERALDEVE**

London Borough of Camden  
Judd Street  
London  
WC1H 9JE

72 Welbeck Street London W1G 0AY

26<sup>th</sup> May 2015  
**Our ref: JCW/LDA/J7242**

Dear Sir

**Parker Tower, 43-49 Parker Street, London, WC2B 5PS**

In accordance with S.73 of the Town and Country Planning Act 1990 (as amended) our client Parker Tower Limited is seeking planning permission for a variation of condition (minor material amendment) in respect of planning permission Ref. 2014/0176/P (dated 18<sup>th</sup> December 2014) at Parker Tower.

Accordingly, we enclose:

- i. Planning Application Form;
- ii. CIL Form;
- iii. Site location plan outlining the site in red;
- iv. Design and Access Statement;
- v. Existing, approved and replacement/revised plans as listed in the Design and Access Statement.

The approved drawings that need to be amended as a consequence of the proposed changes are listed in the enclosed documentation together with a full schedule of the plans which supersede them.

#### **Background**

In 2014 Parker Tower Limited submitted a planning application for the refurbishment and extension of the existing building, including a 2 storey roof extension and alterations to the external elevations to provide 46 units and the erection of a replacement 3 storey and basement building providing 7 residential units.

Gerald Eve LLP is a limited liability partnership registered in England and Wales (registered number OC339470) and is regulated by RICS. The term partner is used to refer to a member of Gerald Eve LLP or an employee or consultant with equivalent standing and qualifications. A list of members and non-members who are designated as partners is open to inspection at our registered office, 72 Welbeck Street, London W1G 0AY and on our website.

BNP Paribas Real Estate Property Development UK (BNP PRE) has since purchased Parker Tower Limited and with it the site and the consented scheme. BNP PRE is a leading commercial and residential developer in continental Europe with very extensive experience. It is a relatively new entrant to the UK market and this will be its first residential development in England. Given expectations associated with its first residential scheme, and the requirement to highlight a commitment to design quality against which future endeavours can be benchmarked, BNP PRE is keen to provide an exemplar development. Consideration has consequently been given to opportunities to improve the permitted scheme, within the remits of what is considered as constituting a minor material amendment.

The permitted scheme provided oversized unit. It is therefore proposed that the mix is amended to better meet and reflect the needs of the borough. This is discussed further below.

BNP PRE is keen to work with the Council collaboratively on this project and has entered into formal pre-application discussions. Officers advised during these pre-application discussions that changing the mix along with minor external changes at roof level is likely to be acceptable in principle.

#### **Site Description**

The application site comprises a sub-basement, basement, ground and 13 upper floor storeys in a tower building constructed in 1967. It is located on the junction of Parker Street and Newton Street, close to the junction with Kingsway (to the northeast). It also includes a two storey podium element on the Parker Street elevation, with vehicular access to the basement via Newton Street.

Its current use is predominantly for office (Class B1) purposes, with a public house (The Newton Arms) located at part ground floor level (with ancillary residential accommodation at first floor level) on the Parker Street / Newton Street junction. The building is currently vacant.

#### **Site Designations**

The site is identified as being within:

- i. Covent Garden (Seven Dials) Conservation Area (CA);
- ii. Archaeological priority area;
- iii. Central London Area;
- iv. Transport for London Underground zone of interest;
- v. Public Accessibility Level (PTAL) of 6b.

#### **Planning Policy**

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. Accordingly, the proposals have been assessed against the policies set out in the London Plan Further Alterations (2015), the Camden Development Policies Document (2010-2025) and the Camden Core Strategy (2010-2025).

Core Strategy Policy CS6 indicates that the Council seeks to maximise the supply of homes and minimise their loss, with housing regarded as the priority land-use of the Camden Local Development Framework.

Policy DP2 of the Development Policies sets out that:

**“The Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing, by:**

- a) **expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site.....”**

Paragraph 5.1 of the Development Policies documents sets out that there is an **“over representation of small dwellings among Camden’s existing homes.”**

The Council seek to restrain the number of studio accommodation being built in the borough stating in paragraph 5.6 of the Development Policies Document that they **“will resist development proposal for self-contained general needs housing that contain only one bedroom and studio flats.”**

Policy DP5 entitled ‘homes of different sizes’ states that the:

**“The Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. We will:**

- a) **seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table, including conversion of existing residential and non-residential floorspace;**
- b) **expect a mix of large and small homes in all residential developments.**

**In considering the mix of dwelling sizes appropriate to a development, the Council will have regard to the different dwelling size priorities for social rented, intermediate affordable and market homes, and will take into account:**

- a) **the character of the development, the site and the area, including the impact of the mix on child density;**
- b) **site size, and any constraints on including homes of different sizes; and**
- c) **the economics and financial viability of the site, including the demand for homes of different sizes.**

	One bedroom	Two bedroom	Three bedroom	Four bedroom +
<b>Social Rented</b>	Lower	Medium	High	Very High
<b>Intermediate affordable</b>	Medium	High	High	High
<b>Market</b>	Lower	<b>Very High</b>	Medium	Medium

## Proposals

The proposal seeks to optimise the current permission by making a minor material amendment (s73) to the original permission, to allow a modest increase in the number of units proposed and related changes to unit mix and size.

The extant permission provides units that significantly exceed the London Plan space standards (Table 3.3).

Unit Size	London Plan Space Standard (Table 3.1) (sqm)	Average size of units in the permitted scheme (sqm)
Studio	37	41
1 bedroom	50	50
2 bedroom	70	75
3 bedroom	95	164
4 bedroom	99	556

**Table 1 – London Plan space standards and average size of permitted units**

While the London Plan makes it clear that these standards are minimums, it is considered that the site could be better utilised and the number of residential units increased. Optimising housing on brownfield sites would meet planning policy at both the national and local level.

The proposed mix is set out below against the permitted

Type	No. Units	% units	Average size (sqm) GIA
Studio	6	15%	41
1 bed	6	15%	50
2 bed	18	45%	75
3 bed	9	23%	164
4 bed	1	3%	556
Total	40	100%	

**Table 2 – Permitted unit mix**

Type	No. Units	% units	Average size (sqm) GIA
Studio	0	0%	0
1 bed	11	24%	50
2 bed	24	52%	75
3 bed	11	24%	131
4 bed	0	0%	
Total	46	100%	

**Table 3 – Proposed revised unit mix (no 4 beds provided)**

#### Considerations

The proposal would provide clear benefits when considered against the permitted scheme:

- i. It would increase the overall number of units delivered;
- ii. It would replace the studio accommodation with one bedroom accommodation. This would provide units of a better quality and amenity to future occupiers.
- iii. It would reduce the proportion and number of one bedroom units from 12 to 11. Policy DP5 and the Dwelling Size priority Table noted above identify one bedroom units as being of lower priority;
- iv. It would increase the number of two bedrooms units which the Council have identified as a high priority based on local need;
- v. The number of family units would increase from 10 to 11. The proportion of family sized units would also increase.

By reducing the average sizes and making the floor plates more efficient it has been possible to provide additional units that better meet the policy objectives of the London Borough of Camden which identifies that there is a 'very high' need for two bedroom units.

As Table 2 shows, the proposed units would continue to meet or exceed, the minimum size specified in Table 3.3 of the London Plan. However the size of the largest units would be substantially reduced, allowing an improved housing yield whilst still providing a high standard of accommodation.

Reducing the size of the largest units, whilst keeping the same number of bedrooms, would make those units available to meet the needs of a wider range of potential purchasers.

The units within the amended scheme would be designed to achieve the same level of compliance with Lifetime Homes as the permitted units. 10% of the units would remain wheelchair adaptable, as originally proposed. This is set out within the Design and Access Statement. We note that the

Government and the Mayor of London have indicated their intention to replace Lifetime Homes by additional standards within the Building Regulations.

The proposed number of units is not dissimilar to the permitted scheme and does not propose any materially or significant changes.

The consequential impacts of the proposed changes, when viewed against the permitted scheme, have been considered. As a result, additional waste and recycling storage is provided within the basement. Additional cycle spaces have been accommodated within the proposed floor layout also. This is set out in further detail within the enclosed Design and Access Statement.

The conversion of the top floor penthouses permitted to two smaller units requires 40sqm of additional floor space to create a link/circulation space immediately adjacent to the core at 15<sup>th</sup> floor level. This is shown on the revised plan and elevation. The minor change to the external appearance of the building at this level is not considered to be materially significant, and given that the set back is retained it is not expected to impact upon the character of the building.

With regard to affordable housing, the approved scheme (Ref: 2014/0176/P) was subject to a s106 agreement which included (clause 4.4.1) a covenant that if any additional residential units are created within the property **'that an appropriate Affordable Housing contribution is provided (either by way of on-site Affordable Housing provision, off site Affordable Housing provision or financial contribution towards the provision of Affordable Housing) such contribution to be calculated by reference to the aggregate total of the Residential Units permitted under the Planning Permission.'**

The applicant proposes to amend the existing s106 legal agreement, by way of a Deed of Variation, to commit to making a full contribution in lieu of affordable housing provision. This would equate to £2,400,425. That is the full deferred affordable housing contribution as set out in the S106 Legal Agreement adjusted to include a further £53,000 in respect of the additional 40sqm now proposed at 15<sup>th</sup> floor level.

This would ensure that Policy DP3 requiring 50% affordable housing would be fully satisfied by a combination of on-site affordable housing and the payment in lieu, equating to 50% affordable housing provision overall. As Policy DP3 would be satisfied in full, there would be no further requirement for a financial re-appraisal. It is therefore proposed that, conditional on the full payment being secured, Section 4.4 of the S106 agreement would be removed or amended by the Deed of Variation to avoid the need for further financial re-appraisal of the proposed alterations.

To regularise this and to tie the new plan number to the original S106, a deed of variation will be required. We would like to discuss the drafting of this early on in the determination period.

#### CIL

Whilst the proposed development will give rise to a modest (40sqm) increase in the permitted scheme, there would still be a reduction on overall floor space from the current buildings and so, consequently no mayoral or Camden CIL would be sought.

#### **Conclusion**

The proposal will not have a materially significant impact when compared to the permitted scheme as a whole. It will increase the number of residential units delivered, better meet Camden's housing need and fully satisfy affordable housing policy.

The number of car parking spaces will remain unchanged, whilst additional cycle storage (5 additional spaces). Additional waste storage has also been provided.

The changes would not materially alter the visual appearance of the permitted development.

We consider that, in the context of the scheme as a whole, the changes above could be considered under a minor material amendment.

We trust that the enclosed information is sufficient to determine the application

[REDACTED]

Yours faithfully

[REDACTED]

**Gerald Eve LLP**

[REDACTED]

Enc.

Cc + Encs. J Gillingham Esq – BNP PRE