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Fergus Freaney
Senior Planning Officer
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London Borough of Camden
Judd Street
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For the attention of Fergus Freaney
23rd December 2015

Our ref: JCW/LDA/J7242

Dear Sir

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

Further to our meeting on 24/11/2015, I write on behalf of Parker Tower Limited seeking to make changes to the extant planning approval on the above site. In accordance with S.73 of the Town and Country Planning Act 1990 (as amended) our client Parker Tower Limited is seeking planning approval for a variation of condition (minor material amendment) in respect of planning permission (ref:2015/2988/P) 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. Approved and replacement/revised plans as listed in the Design and Access Statement.

We also to follow enclose a cheque made out to the London Borough of Camden for £195, this being the requisite planning application fee.

I set out below a summary of the background and the proposal before setting out the relevant planning considerations associated with the proposed changes.

Background

In 2014 Parker Tower Limited submitted a planning application (ref:2014/0176/P) for the refurbishment and extension of the existing tower building, including a 2 storey roof extension and alterations to the external elevations to provide 46 residential units. The proposal also included the erection of a replacement 3 storey (plus basement) building

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providing 7 affordable residential units. The planning permission was granted on 18th December 2014 subject to conditions and S106 Agreement.

Subsequent to the initial planning approval, BNP Paribas Real Estate Property Development UK (BNP PRE) has purchased Parker Tower Limited and the associated Parker Tower Site at 43-49 Parker Street. Consideration was given to opportunities to improve the permitted scheme, within the remits of what is considered to constitute a minor material amendment. Consequently the first application for a minor material amendment (S.73) was submitted on 27/05/2015 (ref:2015/2988/P) and in September 2015 the London Borough of Camden Planning Committee resolved to grant planning permission for a minor material amendment to the original planning permission (ref:2014/0176/P) for the following, subject to the completion of a S106 Agreement:

"Variation of condition 19 (development in accordance with approved plans) as granted under reference 2014/0176/P dated 18/12/14 for external alterations and creation of six additional flats"

We have now reviewed the approved floorplates in anticipation for the construction stages of Parker Tower and seek further Minor Material Amendments to permission ref: 2015/2988/P.

An analysis of the existing structure has been undertaken, including intrusive surveys of the reinforced concrete frame. This together with detailed design of individual apartments and integration of services throughout the building has been developed with the aspects of buildability and delivery of the scheme, minimising the disruption to the buildings neighbours where possible. The review has led to principally four proposed changes to the permitted scheme.

- 1) The structural issues require amendments to the balconies strategy which includes the depths of the balconies at fourth floor levels and above reduced and re-positioned coupled with reconfiguration of internal layouts of the Tower Apartments. This is set out further within the Design and Access Statement. We have considered overlooking and the amenity of neighbouring properties in the new locations of the balconies;
- 2) The current position and layout of the affordable housing units is inefficient due to existing structural columns running through the flats which compromises the quality of the units in terms of room layout. Through our continued dialogue with One Housing Group we have sought to resolve this and are therefore proposing to amend the layouts of affordable housing units. The unit mix and number is not changing from the consented position;
- 3) The permission (ref:2014/0176/P) as originally granted in 2014 presents complicated structural issues which cannot easily be overcome without substantial external alterations to the façade. A structural note is set out within the accompanying Design and Access Statement on the rational and structural analysis that has led to the proposed amendment. The solids and voids in the façade of the Tower building have been shifted slightly in a way that does not materially affect the external appearance of the proposed building; and

- 4) After reviewing the requirements of future occupant's changes to the plant on the roof is proposed.

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. Extant planning permissions, which can be implemented, are significant material considerations in the determination of planning applications. Accordingly, the proposed changes to the extant permission have been assessed against the policies set out in the London Plan (as consolidated with amendments since 2011) (2015), the Camden Development Policies Document (adopted 2010) and the Camden Core Strategy (adopted 2010).

Development Policy DP9 states that the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) character and proportions of the existing building;
- c) quality of materials to be used;
- d) provision of visually interesting frontages at street level;
- e) the appropriate location services equipment;
- f) existing natural features;
- g) the provision of appropriate landscaping; and
- h) the provision of appropriate amenity space; and

Paragraph 2.16 of the Development Policies Document states:

“Outdoor amenity space provides an important resource for residents, which is particularly important in Camden given the borough’s dense urban environment. It can include private provision such as gardens, courtyards and balconies, as well as communal gardens and roof terraces. The Council will expect the provision of gardens in appropriate developments, and particularly in schemes providing larger homes suitable for families. However, we recognise that in many parts of the borough this will not be realistic or appropriate. In these locations, the provision of alternative outdoor amenity space, for example, balconies, roof gardens or communal space will be expected. These amenity spaces should be designed to limit noise and disturbance of other occupiers and so not to unacceptably reduce the privacy of other occupiers and neighbours.”

Development Management Policy DP26 states:

“The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.”

The policy also requires the provision of acceptable standard of accommodation in terms of internal arrangements, dwelling and room size, amenity space, facilities for the storage of recycling and disposal of waste, and cycles storage.

Considerations

The proposed amendments incorporate a series of minor revisions that deal with the implications of construction details and techniques, resulting in four areas of particular note:

- 1) Balconies;
- 2) Reconfiguration of internal layout of Affordable Housing Block;
- 3) Reconfiguration of internal layouts of the Tower Apartments; and
- 4) Roof Plant.

Thorough analysis of the existing structure has been undertaken, since the applicant bought the site with the extant permission, including intrusive surveys of the reinforced concrete frame.

This, together with detailed design of individual apartments and integration of services throughout the building, has been developed with the aspects of buildability and delivery of the scheme, minimising the disruption to the buildings neighbours in this mixed use dense urban location wherever possible.

A number of the revisions have arisen from the need to limit the structural load on the existing foundations and the large transfer beam that sits at second floor level, supported on only six existing columns. The Design and Access Statement sets out the structural issues associated with the extant permission.

Balconies

It has now become apparent that the permitted scheme, after more detailed analysis, would require substantial intervention into the existing floor slabs. It is uncertain whether this approach would be technically feasible/structurally sound and would certainly add additional noisy works, prolonging the disturbance from noise and dust to local offices and residents. The applicant wishes to reduce disturbance to neighbouring residents wherever possible.

The design team have explored a number of alternatives and concluded the best approach is adding a slightly reduced depth balcony and incorporating it into the layout of the individual apartments to beneficial effect. By maintaining the existing floor slab line with edge reinforcement by a steel channel, additional columns and excessive strengthening of the ring beam are avoided. This will avoid the structural issues that would be caused by cutting the slab.

This marginally reduces the external amenity area, but by utilizing sliding folding doors, that allow the full width of the balcony to be open, the balcony becomes an extension to the living space, providing a more practical use of the external amenity by not restricting furniture to fit on the separated 900mm deep balcony, that cuts into the room and reduces available internal space. We consider that this is a benefit as it will increase the usability of the amenity space, and the internal living space.

The location of the balconies has also been reviewed to ensure maximum usability and orientation. Two of the approved balconies face north, many of them off bedrooms (9), plus six floors that have no balcony in the northeast corner, due to the proximity of a neighbouring residential block. The relocation of the balconies increases usability and reduces overlooking. This is supported in Policy DP26. The proposal enhances the usability by moving the balconies from the bedrooms to the habitable rooms whilst ensuring that there would be no new potential for overlooking.

Communal amenity space is provided within the site with a condition requiring landscaping. This will provide amenity space to residents further to any private balcony/private amenity.

Reconfiguration of internal layout of Affordable Housing Block

It is proposed to utilise the existing foundations as much as possible, retaining all the existing boundary retaining walls and use lightweight construction above the ground floor. This necessitates a reworking of the lower floor of the duplex units, retaining existing column positions, with a new transfer structure at ground floor level. The basement level has been reworked appropriately, with more detailed layouts developed for the upper units.

One Housing Group has been selected as the appropriate Registered Provider and has been working with the applicant to optimise the design.

The changes to the affordable block do not reduce the number of affordable units or diminish their quality in terms of residential amenity. By rearranging the internal layouts the quality of the affordable housing has been improved. Therefore the proposals are in line with the extant scheme.

Reconfiguration of internal layouts of the Tower Apartments

The existing service cores in the tower have been adapted to house the necessary distribution of services, including boiler and generator flues to discharge at roof level, and communal supply routes for heating, hot water, electricity and communications, from the plant in the basement, as well as cooling pipework distribution from roof level.

The efficiencies in the Core design allow the maximum of space to be provided to residential floorspace. The internal layouts have been reworked to achieve the most potential and optimal arrangement, whilst also complying with all statutory and servicing requirements.

The internal floor layouts of the tower have been reconfigured to provide a more efficient layout. The proposal would not diminish the level of accessibility when compared to the extant permission. The unit numbers and mix remains unchanged. It is considered that this represents an acceptable change.

Roof Plant

A Building Maintenance Unit (BMU) is proposed to provide safe façade access, with tracks circumnavigating the roof edge, allowing a cradle to be lowered to undertake the work. Access to the roof and flue discharge at a suitable level, have been combined by extending the shaft enclosure to provide flue termination and an access door to roof level. Emergency smoke extraction is a requirement of the Fire Safety Strategy and Building Regulations. The fan units will be screened by louvred enclosure and only operate in an emergency or for routine testing. Cooling plant is located at the rear (north) of the roof, away from most site lines to the building along the open east to west aspect. Importantly, the roof will continue to house PV panels, over a brown roof as per the original permission granted in 2014.

The proposal retains the brown roofs and photovoltaic panels. Cooling plant is located at the rear (north) of the roof, away from most site lines to the building along the open east to west aspect. By positioning plant in this location on the Tower building the amendments would not materially affect the appearance of the building when compared to the extant permission. Due to the setback and height of the building the bulk and massing of the building will not be affected.

Conclusion

The proposal will not have a materially significant impact when compared to the permitted scheme as a whole. The proposal does not create any additional residential units and is purely to rationalise the structural issues that have come to light through design review.

Whilst the façade detailing is slightly changing, the changes would not materially alter the visual appearance of the permitted development or change the overall design concept.

We consider that, in the context of the scheme as a whole, the changes above could be considered under a minor material amendment and meet planning policy at the national and local level.

We trust that the enclosed information is sufficient to determine the application however, should you have any questions or would like to discuss, please do not hesitate to contact either James Wickham (020 7333 6353) or Luke Davies (020 7333 6402).

Yours faithfully,



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