DP4119/JWP/AJH

29 April 2016

FAO Patrick Marfleet

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Dear Mr. Marfleet,

PARKER HOUSE, 25 PARKER STREET, LONDON, WC2B 5PA

APPLICATION FOR NON-MATERIAL AMENDMENTS TO PLANNING PERMISSION REF. 2012/6132/P DATED 30.08.13 (AS AMENDED BY NON-MATERIAL AMENDMENT REF. 2013/5872/P DATED 21.11.13)

DP9 Ltd act on behalf of London & Newcastle Capital Limited, who in turn act as development manager to the owner of the above site, Parker Street No.1 Limited. This application seeks non-material amendments (NMA) to the approved Parker House redevelopment scheme, as consented under full planning permission ref. 2012/6132/P dated 30.08.2013 (and as amended by Non-material Amendment ref. 2013/5872/P dated 21.11.2013). The 2013 NMA comprises minor changes to the Aldwych Workshops element of the scheme, and is not directly relevant to this application. Similarly, a separate Conservation Area Consent was granted for demolition at the above site (ref. 2012/6143/C), but is not affected by these proposed non-material scheme amendments.

The proposed amendments were discussed with yourself and Charlie Rose at a pre-application meeting on 22nd March 2016. It was officers' opinion that the proposed amendments were very likely to be considered non-material in the context of the consented scheme, subject to adequate justification being provided with the formal application. This application seeks to formalise those amendments, and provides clear justification and rationale for the scheme changes.

Application Submission

This application has been submitted via the Planning Portal (ref. PP-05099524) and comprises the following:

- 1. Cover Letter;
- 2. Non-material Amendment Application Form;
- 3. Architectural Drawings and updated Accommodation Schedule, prepared by RPP;
- 4. Design Statement Addendum, prepared by RPP (including Drawing List and technical M&E Note prepared by Scotch Partners);



- 5. Daylight & Sunlight Addendum Statement, prepared by Point 2 Surveyors; and
- 6. Basement Structural Statement, prepared by AKT II.

The requisite fee of £195 has been paid online via the Planning Portal.

Planning History & Background

As noted above, planning permission and conservation area consent were issued in August 2013. These decisions granted consent for the demolition of existing buildings (with retention of the main Parker Street facade), and redevelopment to provide a high quality residential scheme of 43 units (including 3 affordable), within a 6 storey plus basement building and adjacent Aldwych Workshops. The planning permission was amended in 2013 by way of NMA, which related to design changes to the Aldywch Workshop element only.

By way of background, our client purchased the main Parker House site in late 2015 and has since instructed a full architectural and technical team to review the consented scheme and its deliverability. It became apparent that there were a number of technical issues with the consented scheme that required modification, including insufficient plant space in the basement, compromised mechanical/electrical strategy and core allowances, split level structure and insufficient floor build-up which led to further compromised service allowances, and an unsatisfactory waste, servicing and cycle access arrangement. The proposed NMA seeks to correct these technical issues, and therefore secure a workable and ultimately deliverable scheme.

Proposed Non-material Amendments

Minor Basement Enlargement

Having been assessed by our technical consultant team, the consented basement was found to be of insufficient size to deliver all plant requirements. On this basis, we are proposing a minor enlargement of the basement to the order of 38sq.m (GIA). This represents just a 6% increase compared to consented, which when discussed at pre-application stage was deemed non-material by officers. An existing area of basement (32sq.m GIA) is also to be re-utilised. The basement's internal layout has also been revised to better balance its constituent parts with the core locations, and the service routes from the relocated service lift access (see below). The new basement layout is illustrated on the enclosed plans and explained in further detail in the Design Statement Addendum.

The basement changes have been reviewed, assessed and agreed by our client's engineering consultant, AKT II. The enlargement of the basement is capped at 6%, and is sought only for technical reasons. The basement will not be seen in any views from the surrounding Conservation Area, and should not change the conclusions of the Basement Impact Assessment approved under the 2013 consent. The changes are considered non-material.

Revised Core Design

The consented core design provided inefficient and/or unusable allowances for service riser distribution. The two residential cores have therefore been redesigned. These technical design changes



have resulted in associated minor implications for internal corridor and residential unit layouts. However, the architectural team have carefully and sensitively amended the layouts to safeguard residential quality, meaning relevant residential design criteria continue to be met. The changes to the cores are non-material in nature, and any resultant layout changes to the residential units are *de minimis*, with the exception of non-material changes to Units 27 and 38, which have effectively been 'swapped' to ensure they each provide adequate floorspace provision relative to their bedroom numbers (see accompanying Accommodation Schedule). This swap has jointly been brought about by the design changes at upper levels (see below).

Revised Structural Design

The consented scheme comprises a split level structural design that differs from the front elevation to back. This design leads to compromised services design and doubling-up of riser/ducting requirements with in most instances crossovers needed. With input from AKT II and Scotch Partners, the technical team has amended the levels to achieve a more efficient design, and maintained an appropriate relationship with the retained facades and window openings. In addition, floor build-up within the consented structure was considered to have been underestimated. The revised structure includes revised floor build-up, without compromising internal floor to ceiling heights. These structural changes have led to a consequential, but marginal increase in height of the building in the order of 0.994m.

To reduce any perceived visual impact of the height increase, the design team has worked to re-profile the upper storeys, and pull back the penthouse building lines facing Parker Street. These amendments have been coupled with finer grain design tweaks at upper levels that are identified in the enclosed Design Statement Addendum. Townscape and design have been considered carefully, particularly in terms of any implications on views on or along Parker Street, particularly given the Conservation Area setting. The 0.994m height increase is in itself considered to be non-material, whilst the minor design changes at upper levels safeguard against any appreciable (or additional) visual impact on the streetscene when compared to the consented scheme. The amended upper levels continue to respect the integrity of the retained façade, and in our view do not give rise to adverse impacts on its form, character or appearance. The revised upper level profiles have been considered from a sunlight and daylight perspective, which as evidenced by the accompanying Note prepared by Point 2 Surveyors, does not change the findings of the previous 2013 assessment.

Parker Street Elevation:

Changes to this elevation are driven principally by a revised servicing, waste and cycle store strategy. The consented scheme comprised a servicing solution from the central door on Parker Street, which was also to be used by residents. This shared access was considered to severely impact on residential quality and experience, notwithstanding it required internal floorspace at ground to be given over to ancillary facilities, rather than to residential use.

The consented main entrance door is to be retained (and replaced as per the consent), and the adjacent window is now to be reinstated and refurbished/replaced as appropriate. The service entrance is then to be moved to the east end of the elevation, at which there is an existing service door and adjacent window. The small existing window in this location will be removed, and the existing door opening made larger to enable safe and secure waste, cycle and service/plant access. The service lift has been

relocated behind this revised access point. The design of the new service door is purposely in keeping with that of the main entrance, but remains subservient given that that entrance is located centrally, and is signified by its portico above.

In our view the reinstatement of the central window, and the removal of the eastern window to facilitate a larger service opening with consistent door appearance can together be considered immaterial in planning and heritage terms. Overall this solution presents a much improved servicing strategy to maintain residential experience, and does not materially impact on the character or appearance of the main façade when compared to the consented scheme.

Overall, the technical issues that result in proposed design changes do not materially alter the consented scheme. There is no change to the number of residential units or the mix, whilst the overall floorspace remains almost identical to the approved scheme (+ 0.1sq.m change). The core and structural changes do not impact on residential quality. The minor increase in height (994mm) is mitigated through careful re-profiling and tweaks to the upper storey design. The amendments to the Parker Street elevation are minor, and immaterial, but improve residential experience. Overall, the changes are considered non-material in planning and heritage terms, and clearly have no appreciable impact on neighbours, the Conservation Area, or the quality of the scheme when taken as a whole.

Concluding Remarks

We trust that you have sufficient information to register, validate and determine this application within the statutory timescales. However, if you require anything further or wish to discuss the proposed non-material amendments then please do not hesitate to contact me or Jim Pool at this office.

Yours sincerely,

Alan Hughes Senior Planner **DP9 Ltd**

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