

**The Old Dairy, 7 Wakefield Street,
WC1N 1PG**

Section 73 amendment application to
permission 2015/0825/P

indigo.

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May 2017

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Appendices

Appendix 1
Planning History

1. Executive Summary

- 1.1. The Old Dairy, 7 Wakefield Street was originally granted planning, listed building and conservation area consent on 14th March 2012 to redevelop the vacant former dairy buildings or provide a mixed-use development comprising 1102sqm of B1 commercial floorspace and 5 residential houses. (LPA refs: 2011/6032/P, 2011/0368/L and 2011/6033/C).
- 1.2. The scheme was amended in 2015 (ref: 2015/0825/P) to increase the number of approved residential units from 5 to 10. No alterations were made to the approved commercial units.
- 1.3. The site was subsequently bought in 2016 by Cudworth Limited, who now seek to deliver the consented development whilst increasing the number of residential properties from 10 to 13. A minor material amendment is sought to alter the approved housing mix in response to the change in market conditions.
- 1.4. As a consequence of the changing economic environment, market demand for large family sized homes in Central London has significantly reduced. The proposals provide a more efficient layout and mix of apartment sizes better suited to meet current market demands.
- 1.5. The proposed amendment to the size and mix of apartments fully accords with adopted local policy DP2 and DP5 and emerging policy H6 and H7 of Camden's emerging Local Plan.
- 1.6. The proposed amendments are minor and are compliant with Development Plan policies in respect of mix, density and residential amenity. There would be no additional highways or heritage impacts resulting from the proposals and they are consistent with the NPPF, London Plan and Camden's Development Plan.

2. Introduction

- 2.1. This Planning Statement has been prepared by Indigo Planning on behalf of our client, Cudworth Limited; “the applicant”. It accompanies an application for the variation of condition 25 of Planning Permission 2015/0825/P at The Old Dairy, 7 Wakefield Road, London, WC1N 1PG. The application proposes:

“Variation of condition 25 (approved drawings) attached to planning permission 2011/6032/P dated 14/03/2012 and 2015/0825/P dated 19.10.2015 (for redevelopment of site to provide a mixed residential/commercial development in 2 blocks, comprising Class B1 business space in two basement and 2 storey units at western end of site; Class C3 dwellinghouses in five basement and 2 storey units at eastern end of site; plus associated landscaping, courtyard servicing and vehicular access from Wakefield Street, and retention of existing northern boundary wall and gable end walls of warehouse adjoining Regent Square) namely to allow the amendments to the residential mix, increase in the total number of units to 13 and minor associated external alterations. And 26sqm (GIA of commercial floorspace.”

- 2.2. The purpose of this Statement is to demonstrate that the proposed development complies with relevant planning policies and has due regard to other material planning considerations. It should be read in conjunction with the following supporting documents.

Supporting documents

- 2.3. In addition to this Statement, the application is accompanied by the following documents:

- Application forms, signed and dated;
- Site Location Plan (dwg ref: 1250-10-001);
- Proposed Lower Ground Floor Plan (dwg: 1250-11-002-PA02);
- Proposed Ground Floor Plan (dwg: 1250-11-003-PA02);
- Proposed First Floor (dwg: 1250-11-004-PA02);
- Proposed Roof and Landscape Plan (dwg: 1250-11-005-PA02);
- Garden Elevation AA (dwg: 1250-12-001-PA02);
- Regents Terrace Elevation (dwg:1250-12-002-PA02);
- Unit 1 and Unit 7 Elevations (dwg: 1250-12-003-PA01);
- Proposed Section AA and BB (dwg: 1250-13-001-PA02);
- Proposed Section CC and DD (dwg: 1250-13-002-PA02);
- Proposed Section EE and FF (dwg: 1250-13-003-PA02);
- Proposed Section GG and HH (dwg: 1250-13-004-PA02);
- Proposed Section II (dwg: 1250-13-006-PA02);
- Transport Statement, prepared by TTP Consulting;

- Design and Access Statement Addendum, prepared by Stanhope Gate Architects
- Daylight and Sunlight, and Internal Daylight Assessment prepared by Michael Popper Associates LLP;
- Basement Design Statement and Report on the Implications of the Proposed Development on St Georges Boundary Wall addendum, prepared by Mason Navarro Pledge;
- Energy and Sustainability Statement, prepared by Michael Popper Associates LLP;
- Construction Management Plan, prepared by HPM Developments;

Document Structure

2.4. This Statement is structured as follows:

- Chapter 3 describes the site and surrounding area;
- Chapter 4 describes the proposed development;
- Chapter 5 identifies any relevant planning policies or guidance;
- Chapter 6 provides our assessment of the proposals; and
- Chapter 7 outlines our conclusions as to why planning permission should be granted.

3. Site and Surroundings

The application site

- 3.1. The application site is located off Wakefield Street via a narrow mews access. The site itself is triangular and is approximately 0.2ha in size. It currently comprises a vacant warehouse, which covers almost the entirety of the site. It also has a yard and carparking area to the front and another small yard area at the rear. The site has a PTAL rating of 6b.
- 3.2. The site is bounded by the access road to the west, the rear gardens of 1-17 Regents Square to the north and St Georges Gardens to the south. The adjacent site, fronting onto Wakefield Street lies immediately to the north-western boundary of the application site. There are also three recently developed mews houses on the south-western boundary of the site (now complete and occupied).
- 3.3. The application site lies within Flood Zone 1 and borders the Grade II* registered park of special interest which contains numerous listed structures and memorials. The boundary wall between The Old Dairy and St Georges Garden's is also Grade II* Listed. The site is located within the Bloomsbury Conservation Area.

The surrounding area

- 3.4. The surrounding area is characterised by a mix of uses including large areas of open space, commercial uses and residential dwellings.
- 3.5. The site immediately adjacent to 7 Wakefield Street on its south-west boundary was granted permission in May 2010 for the erection of three basement and two storey terraced houses (Known as 8, 9 and 10 Wakefield Street) (LPA Ref: 2009/5820/P).
- 3.6. The proposed amendment to replacement condition 25 would not have an adverse impact on the character or appearance on the application site or its immediate context.

Relevant Planning History

- 3.7. A breakdown of all relevant planning history is appended to this Statement at Appendix 1. However, a summary of this is set out below.
- 3.8. Planning Permission (2011/0339/P) was granted on 14 March 2012 for:
- “Redevelopment of site to provide a mixed residential/commercial development in 2 blocks, comprising: 1102 sqm business space (Class B1) in 2x basement and 2 storey units at western end of site; 5 dwellinghouses (Class C3) in 5x basement and 2 storey units at eastern end of site, comprising of 1x 2-bedroom house with garden and 4x3-bedroom houses with roof terraces; plus associated landscaping, courtyard servicing and vehicular access from Wakefield Street, and retention of existing northern boundary wall and gable end walls of warehouse adjoining Regent Square.”
- 3.9. Listed Building and Conservation Area Consent was granted on 14 March 2012 for:
- “Works to protect existing listed wall on boundary with St Georges Gardens in association with redevelopment of the site.”
- 3.10. Conservation Area Consent was granted on 14 March 2012 substantial demolition of the existing warehouse buildings on site.

- 3.11. Permission 2011/0339/P was varied via S73 (2015/0825/P) and approved on 19 October 2015, for:
- “Variation of condition 25 (requiring development to be carried out in accordance with approved plans) attached to planning permission reference 2011/6032/P dated 14/03/12 (for redevelopment of site to provide a mixed residential/commercial development in 2 blocks, comprising Class B1 business space in two basement and 2 storey units at western end of site; Class C3 dwellinghouses in five basement and 2 storey units at eastern end of site; plus associated landscaping, courtyard servicing and vehicular access from Wakefield Street, and retention of existing northern boundary wall and gable end walls of warehouse adjoining Regent Square), namely to allow (as a Minor Material Amendment) change of use from 3 approved houses in centre of site to 8 new flats plus additional windows on rear and front facades, 3 reconfigured roof terraces, and associated enlarged cycle and refuse stores in communal yard.”
- 3.12. The 2015 S73 permission sought amendments to subdivide three houses in the centre of the site, as originally approved, into eight flats as well as associated changes to the front and rear elevations and roof terrace. This doubled the total number of dwellings on site from five to 10.
- 3.13. This application seeks to make a further amendment to the previously “replaced condition 25” (Condition 1) attached to planning permission 2015/0825 of the original planning permission 2011/6032/P. Further details of these new proposals can be found in Chapter 4.

4. Proposed amendment to Planning Permission 2015/0825/P

- 4.1. This submission seeks planning permission under Section 73 of the Town and Country Planning Act (1990) for a minor material amendment to Condition 25 of planning permission 2015/0825/P. Specifically the submission seeks approval for:

“Variation of condition 25 (approved drawings) attached to planning permission 2011/6032/P dated 14/03/2012 and 2015/0825/P dated 19.10.2015 (for redevelopment of site to provide a mixed residential/commercial development in 2 blocks, comprising Class B1 business space in two basement and 2 storey units at western end of site; Class C3 dwellinghouses in give basement and 2 storey units at eastern end of site; plus associated landscaping, courtyard servicing and vehicular access from Wakefield Street, and retention of existing northern boundary wall and gable end walls of warehouse adjoining Regent Square) namely to allow the internal reconfiguration of units and alterations at basement level to facilitate the subdivision of 8 flats into 11 flats, increasing the total number of dwellings to 13 and 26sqm (GIA) of commercial floorspace.”

- 4.2. The submission proposes internal reconfiguration of the residential element of the development to increase the number of units from 10 to 13 in response to market conditions and to provide an improved sales mix and rationalise oversized units. The changes result in minor changes to fenestration only.
- 4.3. The table below sets out the proposed changes to the approved housing mix, whilst the full details illustrating the revised layout is set out in the accompanying Design and Access Statement Addendum.

	1 Bed/ 2 Person	2 Bed/ 4 Person	3 Bed/ 6 Person	Total Unit Number
Original PP (LPA Ref: 011/6032/P)	0	1	4	5
Approved Section 73 (LPA Ref: 015/0825/P)	0	8	2	10
Proposed mix	1	10	2	13

Table 4.1: Housing Mix

- 4.4. Other internal changes include amendments to both approved townhouses to improve the internal accommodation and all other flats and duplexes have been laid out to provide well sized units which exceed the space standards set out in Table 3.3 of the London Plan and the Mayor’s Housing SPG, and CPG 2 Housing (2016).
- 4.5. All units will be dual aspect and there are no proposed changes to the building envelope. Minor changes are proposed to the building fenestration and the building entrances would be relocated to reflect the unit mix changes.

- 4.6. The proposal does not seek to alter the ridge height or roof profile of the development, though the windows have even rationalised to accommodate the alterations in room layout. There is also a proposed reduction in the number of roof lights.
- 4.7. There will be a small reduction in massing on the rear elevation in order to provide an additional courtyard for one of the townhouses (10.4 sqm).
- 4.8. Cycle parking has increased to 40 spaces spread across the development to meet the London Plan minimum requirements.
- 4.9. There is no change to the size or configuration of the basement. A proposed amendment to the basement methodology is proposed, following review and appointment of a principal contractor, reflecting a raft rather than a sheet piling solution originally envisaged. The revised methodology is set out in the accompanying basement design statement addendum. This Statement concludes that there are no further impacts This includes consideration of the retention of the St George's Garden Wall over the temporary construction period.
- 4.10. A small uplift in commercial floorspace is proposed. The uplift is a result of:
- (i) technical design and the thinning of basement structural wall which has led to a slight increase in GIA (26 sqm); and
 - (ii) due to the method of measurement, and discrepancies in the original 2012 planning permission; 6 sqm not accounted for under the original consent. The office floorplan drawings (internal footprint) have not changed from those on which were approved in the original planning application (ref: 2017/6032/P).
- 4.11. Please find below a schedule of approved remeasured commercial floorspace:

Approved Floorspace (Ref:2011/6032/P)	Proposed measured floorspace
1102 sqm	1128 sqm

Table 4.2: Commercial Floorspace

Pre-application discussions with LB Camden

- 4.12. Informal pre-application discussions have been held with Camden officers throughout the preparation of this amendment application. In principle, it is agreed the appropriate form of the application is S.73 minor material amendment; the uplift in unit numbers and mix is acceptable in principle subject to meeting all other policy requirements.
- 4.13. A pre-application meeting was held with LB Camden Officer's Kristina Smith and Charles Thuaire on 7th April 2017 to review the proposed changes. No further comments were raised at this time, however, an internal daylight assessment was requested, which was provided in draft form on 09.05.17.

5. Planning Policy Context

- 5.1. Section 38(6) of the Town and Country Planning Act 1990 states that any determination to be made under the Planning Acts must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2. The Development Plan for the site comprises the following documents:
- The London Plan (2011) as amended 2016;
 - Camden Core Strategy 2010; and
 - Camden Development Management Document 2010.
- 5.3. The legislation concerning the protection of listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990. Of particular relevance are sections 16 & 66 of the Act regarding the setting of listed buildings, and Section 69 of the Act that deals with Conservation Areas.
- 5.4. Other policy documents that are material to the consideration of proposals at the site are the National Planning Policy Framework (NPPF) and LB Camden's Supplementary Planning Documents and Guidance.

National Planning Policy Framework (NPPF)

- 5.5. Paragraph 14 of the National Planning Policy Framework (NPPF) states that:
- “At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.”*
- 5.6. The NPPF, at paragraph 17 outlines 12 core planning principles which state that planning should proactively drive and support sustainable economic development to deliver new homes; seek to secure high quality design; encourage the use of previously developed land; and focus significant development in sustainable locations.
- 5.7. Other key references from the NPPF include:
- 5.8. Paragraph 6 states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 5.9. Paragraph 14 states that at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development.
- 5.10. Paragraph 17 sets out the 12 core planning principles of planning which should be a creative exercise in finding ways to enhance and improve the places in which people live their lives; proactively drive and support sustainable economic development; high quality design which respects the locality, whilst transitioning to a low carbon future.
- 5.11. Paragraph 50 seeks to deliver a wide choice of high quality homes, to create sustainable, mixed and inclusive communities.
- 5.12. Paragraph 131 sets out matters that LPAs should take into account, including the desirability of new development making a positive contribution to local character and distinctiveness.

- 5.13. Paragraph 134 sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals, including securing its optimum viable use.

The Development Plan

- 5.14. The Development Plan for the site includes the consolidated London Plan (March 2015), the Core Strategy (2010) and Development Management Policies DPD (2010). The relevant policies from each of these documents are identified below.

The London Plan (March 2016)

- 5.15. The London Plan provides the overall strategic plan for London with the aim of promoting sustainable development.
- 5.16. The following policies of the London Plan are relevant to this proposal:
- 5.17. Policy 3.3 seeks to support development which increases housing supply in accordance with local targets.
- 5.18. Policy 3.4 requires developments to deliver the appropriate quantum of housing with respect to its local environment.
- 5.19. Policy 3.8 expects development to provide a range of housing choices in terms of mix of housing sizes and types, and ensure that all homes are accessible.
- 5.20. Policy 7.4 requires developments to have regard to the form, function and structure of an area place, or street and the scale, mass and orientation of surrounding buildings.
- 5.21. Policy 7.8 expects new developments to incorporate measures that identify, protect, value, restore and reuse a sites archaeology.

Camden Core Strategy (November 2010)

- 5.22. The key relevant policies for consideration of the proposed development are summarised as follows:
- 5.23. CS1 aims to focus Camden's growth in the most suitable locations whilst achieving sustainable development.
- 5.24. CS5 aims to manage the impact of growth and development in Camden by ensuring that development meets the full range of objectives of the Core Strategy and other Local Development Framework documents
- 5.25. CS6 seeks to make full use of Camden's capacity for housing by maximising the supply of additional self-contained homes.
- 5.26. CS14 aims to promote high quality places and conserve heritage assets. Developments must respect the local context and character of an area and be of the highest standards in terms of design, access into buildings, and in regards to landscaping. All heritage assets and their setting must be preserved and enhanced.

London Borough of Camden Development Management Document (2010)

- 5.27. The key relevant policies for consideration of the proposed development are summarised as follows:
- 5.28. DP2 requires development to make full use of Camden's capacity for housing on sites that are underused or vacant.

- 5.29. DP5 requires proposed schemes to contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes in accordance with the Dwelling Size Priorities Table and providing a range of large and small homes in all residential developments.
- 5.30. DP24 requires all developments to be of the highest standard of design. Developments should consider the context of their surroundings, the quality of materials to be used, existing natural features, the provision of appropriate amenity space, the provision of visually interesting street frontages and accessibility.
- 5.31. DP25 seeks to conserve Camden's Heritage. The Council will only permit development that preserves and enhances the character and appearance of the area, does not impact on any listed buildings or their settings and does not impact on the remains of archaeological importance.
- 5.32. DP26 aims to manage the impact of development on occupiers and neighbours. When assessing an application, the Council will consider visual privacy and overlooking; overshadowing and outlook; sunlight and daylight levels; odour, fumes and dust and any microclimate. Developments must also provide acceptable standards of accommodation, waste and bicycle storage facilities and outdoor space

Emerging Local Plan

- 5.33. On 24 June 2016 Camden submitted the Camden Local Plan and supporting documents to the Secretary of State for Communities and Local Government for independent examination. The Inspector's Report was published in April 2017, who found the plan sound. Accordingly, material weight will be given to the emerging policies in determining planning applications.
- 5.34. The emerging Local Plan will replace the current Camden Core Strategy and Development Managing Policy documents with a comprehensive planning framework.
- H1 – Maximising housing supply
 - H6 – Housing choice and mix
 - H7 - Large and small homes
 - E2 – Employment premises and sites
 - D1 – Design
 - D2 – Heritage
 - CC1 – Climate Change Mitigation
 - CC2 Adaption to climate change
 - CC5 – Waste
 - T1 – Prioritising walking, cycling and public transport
 - T2 – Parking and car-free development

Camden Supplementary Planning Document's

- 5.35. Camden Planning Guidance of relevance to this application is as follows:
- CPG 1 Design (2014) – The purpose of this guidance is to promote design excellence and to outline the ways in which high quality design can be achieved;

- CPG 2 Housing (2016) - This document provides guidance on housing development within Camden, including residential space standards and wheelchair accessible housing;
- CPG 3 Sustainability (2013) – The purpose of this guidance is to provide more sustainable developments;
- CPG4 Basement and Lightwells (2015) – This document provides guidance on basement development.

Bloomsbury Conservation Area Appraisal and Management Strategy (2001)

- 5.36. The site falls within the Bloomsbury Conservation Area, for which a Conservation Area appraisal and management strategy has been prepared (2011). This sets out the background and historical development of the area and its significance.
- 5.37. The site is mentioned within the Bloomsbury Conservation Area Appraisal as being “of little value in conservation area terms but the buildings are low key in terms of their context.”

6. Planning Assessment

- 6.1. This section provides an assessment of the proposed development against relevant planning policies outlined in Section 5. This section should be read in conjunction with the other reports that accompany this submission.

Housing

- 6.2. The proposed amendment seeks to rationalise oversized units and create an improved sales mix in response to market conditions. This process has increased dwellings across the site by three, taking the approved number of dwellings to 13. Internal reconfiguration and minor fenestration changes are required in response to the revised mix associated internal re-configuration
- 6.3. The table below sets out how the number of units proposed has changed since the original consent was granted in 2012. The new proposals would introduce an additional three units in total and represent a more efficient and marketable use of space.
- 6.4. The proposed increase in the number of dwellings at the Old Dairy would be in accordance with policy 3.3 of the London Plan which seeks to increase the supply of homes in the capital, and Camden's policy CS1 which encourages the most efficient use of land within the borough as possible. Furthermore, the proposals are also compliant with Policy DP2 of the Development Policies document and Emerging Local Plan Policy H1 which seek the maximum appropriate contribution to housing on underused or vacant sites.

Employment

- 6.5. Following technical design a marginal increase of 26 sqm (GIA) in office floorspace is proposed. The GEA remains unaffected. This floorspace increase in di minimis and represents 2 % increase over the approved commercial (GIA) floorspace.
- 6.6. Notwithstanding this, any increase employment floorspace is supported in policy, including Core Strategy Policy CS8 and emerging Local Plan Policy E2, which seeks to encourage employment floorspace in the CAZ and support the local economy.

Unit Mix

- 6.7. The reconfiguration of the internal layouts would introduce one 1 bed/2-person unit and two additional 2 bed/4 person units, creating a more diverse unit mix. The amendments to the proposed unit mix are as follows:

	1 bed/ 2 Person	2 bed/ 4 person	3 bed/ 6 Person	Total Unit Number	Total Number of People	Unit Mix Percentage
Original PP (LPA Ref: 2011/6032/P)	0	1	4	5	28	20% 2 bed 80% 3 bed
Approved Section 73 (LPA Ref: 2015/0825/P)	0	8	2	10	44	0% 1bed 80% 2 bed 20% 3 bed
Proposed	1 (+1)	10 (+2)	2 (0)	13 (+3)	54	8% 1 bed 77% 2 bed

Section 73						15% 3 bed
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Table 6.1: Unit Mix Variation from 2015 Permission

- 6.8. Policy DP5 of the Development Policies document states that the council seek a mix of large and small units within developments. The council's dwelling size priorities table sets out the preferred mix of unit sizes by tenure type. For market housing the council state the following:

Adopted Policy Dp5		Emerging Policy H7	
1 Bed	lower	1 Bed	lower
2 Bed	very high (aim of 40%)	2 Bed	high
3 Bed	medium	3 Bed	high
4 Bed (+)	medium	4 Bed	lower

Table 6.2: LB Camden Adopted and Emerging Housing Mix Policy

- 6.9. The proposed amendments to the unit mix would provide more two bedroom units than any other size and the two bedroom units would contribute 77% of the total proportion which far exceeds the preferred mix set out in Policy DP5 and is consistent with emerging policy H7.
- 6.10. The proposed mix amendments also accord with emerging Local Plan Policy H6, which encourages provision of a diverse range of housing products.

Space Standards

- 6.11. The proposed amendments to the internal layout and the creation of an additional three apartments would change the size of the previously approved apartments.
- 6.12. Each home would far exceed the minimum space standards set out in Table 3.3 of the London Plan and the Mayors' Housing SPG and CPG 2 Housing (2016).
- 6.13. The proposed floorspace would provide residents with a high quality, comfortable living environment which would also be in compliance with Core Strategy policy CS14 which encourages developments that are of the highest quality design and Emerging Local Plan Policy D1, which seeks to provide the highest quality living environments.

Residential Amenity

- 6.14. Private amenity space will be provided for 10 of the 13 units. This is consistent with the original planning permission and was accepted by the LPA due to the constrained nature of the development site (LPA Ref: 2015/0825/P). Each flat is generously proportioned and as such, the equivalent private amenity space internally.
- 6.15. In addition, St George's Communal Gardens is located adjacent to the development site and will provide usable amenity space for those units that lack private amenity space, as well as all other occupiers.

Accessible and adaptable dwellings [Lifetime Homes]

- 6.16. All apartments will be designed to meet Building Regulation M4(3) universally accessible, with one unit providing completely level access for wheelchair users, via a platform lift. Please refer to the relevant section of the accompanying Design and Access Statement. This is in accordance with policy CS6 of the Camden Core Strategy and DP6 of the Development Policies document and Emerging Local Plan Policy H6.

Internal Daylight Assessment

- 6.17. All units exceed the minimum requirements for internal daylight levels, in accordance with policy DP26 of the Development Policies document, and this is detailed further in the accompanying Internal Daylight Assessment prepared by Michael Popper Associates.
- 6.18. As a result of the internal alterations and increase in windows to the basement apartments, the average daylight factor for all units are improved against the 2015 consent and all exceed the minimum average daylight factor requirements for habitable rooms.

Heritage Assessment

- 6.19. The application site is located within the Bloomsbury Conservation Area and is adjacent to several listed structures, including the southern boundary wall to St George's Gardens, which is Grade II listed.
- 6.20. The Bloomsbury Conservation Area Appraisal notes the significance of St George's Gardens to the character and appearance of the conservation area and the pattern of surrounding development.
- 6.21. The proposed external alterations will not significantly alter the approved character or appearance of the building. The scale, bulk or massing will remain unchanged, with the exception of a marginal reduction in massing along the rear elevation.
- 6.22. The amendments would not alter the building envelope or height on the southern face of the building. Accordingly, there would be no impact on the adjacent Grade II listed St George's Gardens wall.
- 6.23. There would be no change in the quality of the design or on the sensitivity to which care is paid to proximal heritage assets and as such is considered to be in accordance with London Plan policy 7.8, Core Strategy policy CS14, Development Policies Policy DP25 and Emerging Local Plan Policy D2.

Transport Impacts

- 6.24. The proposed development remains car free, and no changes are proposed to this element of the scheme. An updated Transport Statement has been prepared in support of this application. The Transport Statement concludes there are no additional transport impacts resulting from the proposed amendments.
- 6.25. Given updated local and regional transport policy requirements the number of required cycle spaces has increased to 40 cycle spaces, which will be accommodated within the scheme and are compliant with London Plan standards.
- 6.26. The updated Transport Statement confirms that refuse vehicles will be able to service on-site, both ingress and egress in a forward gear.
- 6.27. The Owner remains bound by S106 clause 4.13.1 and 4.13.4, which prohibits on street parking permits.

Revised Basement Methodology

- 6.28. There is no change to the size or configuration of the basement. A proposed amendment to the basement methodology is proposed, following review and appointment of a principal contractor, reflecting a raft rather than a sheet piling solution originally envisaged.
- 6.29. The revised methodology is set out in the accompanying basement design statement addendum. This includes consideration of the retention of the St George's Garden Wall over the temporary construction period.

- 6.30. As set out in the accompanying Addendum to the approved Basement Design Statement there are no additional impacts to ground water flow, land stability or hydrology.

Construction Management Plan

- 6.31. An updated Construction Management Plan to the original construction management plan has been prepared to support and reflect the changes proposed in this amendment application.
- 6.32. This document sets out the detailed works which are required throughout demolition, excavation and construction.

Energy and Sustainability

- 6.33. In response to pre-application advice received from LB Camden Sustainability Officers the proposed amendments were re-assessed in accordance with recommendations.
- 6.34. The amendments result in a reduction in emissions of 24.1 tonnes CO₂ per annum. It represents a reduction of 37.6% over part L1A 2013 requirements and an annual carbon saving of 14.5 tonnes CO₂, exceeding the 19% CO₂ target of the London Plan 2011.

Community Infrastructure Levy

- 6.35. Pre-application discussions with LB Camden CIL Officers confirmed the transitional provisions 128a of the CIL regulations (as amended by the 2014 Regulations) apply. This applies because the original grant of planning permission was granted before the levy charge came into force. Accordingly, any CIL liability is applicable to the uplift in floorspace area only (GIA).
- 6.36. The uplift in in commercial floorspace is 26sqm which falls short of the 100sqm threshold for liability.
- 6.37. There is a small reduction in residential floorspace overall from the 2015. The floorspace approved in 2015 was 1834.6sqm and the proposed floorspace as a result of the reduction in massing is 1,824.2 sqm.
- 6.38. This brings the overall change in floorspace across the development to an uplift of 16.4 sqm. Based on the above, there is no CIL liability as a result of these minor amendments.

Conclusions

- 6.39. The amendments seek to improve the scheme sales mix and sales rate in response to changing market conditions.
- 6.40. The proposed amendments are minor and are compliant with Development Plan policies in respect of mix, space standards and residential amenity, without any material alterations to the internal or external aspects of the building.
- 6.41. There would be no additional highways or heritage impacts resulting from the proposals and they are consistent with the NPPF, London Plan and Camden's Development Plan.

Appendix 1

Planning History

Reference Number	Description of Development	Decision	Decision Date
2011/0368/L	Works to protect existing listed wall on boundary with St Georges Gardens in association with redevelopment of site	Granted	5 July 2011
2011/0339/P	Redevelopment of site following demolition of existing warehouse to provide a mixed residential/commercial development, comprising: 1279 sqm Class B1 office space at basement and ground floors; 1542 sqm Class C3 residential space, arranged as 3 blocks above the commercial space at 1st and 2nd floors plus roof terraces (comprising 3x 2 bed and 2x 3 bed flats), a 2 storey 3 bed house at the eastern end and a separate 2 storey plus basement block of 2 x 2 bed houses (with roof terraces) at the western end; plus associated plant rooms, relocated substation, landscaping and courtyard servicing and vehicular access from Wakefield Street.	Refused, Appeal withdrawn.	Appeal withdrawn 6 March 2012
2011/6035/L	Works to protect existing listed wall on boundary with St Georges Gardens in association with redevelopment of site	Granted	14 March 2012
2011/6033/C	Substantial demolition of warehouse building	Granted subject to S106 Agreement	14 March 2012
2011/6032/P	Redevelopment of site to provide a mixed residential/commercial development in 2 blocks, comprising: 1102 sqm business space (Class B1) in 2x basement and 2 storey units at western end of site; 5 dwellinghouses (Class C3) in 5x basement and 2 storey units at eastern end of site, comprising of 1x 2-bedroom house with garden and 4x3-bedroom houses with roof terraces; plus associated landscaping, courtyard servicing and vehicular access from Wakefield Street, and retention of existing northern boundary wall and gable end walls of warehouse adjoining Regent Square.	Granted subject to S106 Agreement	14 March 2012
2014/7816/P	Details of ground investigation required by condition 14a and remediation measures required by condition 14b of planning permission 2011/6032/P dated 14/03/2012 (for redevelopment of site to provide mixed residential/commercial buildings)	Granted	13 March 2015

2014/7896/P	Details of archaeological investigation required by condition 20a of planning permission 2011/6032/P dated 14/03/2012 (for redevelopment of site to provide mixed residential/commercial buildings)	Granted	13 March 2015
2015/0257/P	Details of structural method statement required by condition 9 of planning permission 2011/6032/P dated 14/03/2012 (for redevelopment of site to provide mixed residential/commercial buildings)	Granted	13 March 2015
2015/0258/P	Details of waste storage required by condition 13 and cycle storage required by condition 17 of planning permission 2011/6032/P dated 14/03/2012 (for redevelopment of site to provide mixed residential/commercial buildings)	Granted	13 March 2015
2015/0825/P	Variation of condition 25 (requiring development to be carried out in accordance with approved plans) attached to planning permission reference 2011/6032/P dated 14/03/12 (for redevelopment of site to provide a mixed residential/commercial development in 2 blocks, comprising Class B1 business space in two basement and 2 storey units at western end of site; Class C3 dwellinghouses in five basement and 2 storey units at eastern end of site; plus associated landscaping, courtyard servicing and vehicular access from Wakefield Street, and retention of existing northern boundary wall and gable end walls of warehouse adjoining Regent Square), namely to allow (as a Minor Material Amendment) change of use from 3 approved houses in centre of site to 8 new flats plus additional windows on rear and front facades, 3 reconfigured roof terraces, and associated enlarged cycle and refuse stores in communal yard.	Granted subject to a S106 agreement.	19 October 2015
2017/0669/P	Details of a programme of archaeological investigation required by condition 20a of planning permission dated 14/03/2012 ref 2011/6032/P for Redevelopment of site to provide a mixed residential/commercial development.	Granted	17 March 2017