

DP4771/PEH/TH

3rd April 2018

Mr Jonathan McClue
Regeneration and Planning
London Borough of Camden
5 Pancras Square
London
N1C 4AG

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

www.dp9.co.uk

Dear Jonathan,

**MOUNT PLEASANT – LAND TO WEST OF ROYAL MAIL SORTING OFFICE
BOUNDED BY PHOENIX PLACE, MOUNT PLEASANT, GOUGH STREET AND
CALTHORPE ST, CAMDEN, WC1**

NON-MATERIAL AMENDMENT APPLICATION REF. 2018/0817/P

REVISED SUBMISSION

We are instructed by our client, Taylor Wimpey Central London (TWCL) (the Applicant), to formally submit the enclosed revised proposals for approval under current application ref. 2018/0817/P. The following material is enclosed:

- Revised Proposed Drawings and accompanying drawing schedule (for approval). The drawing revisions listed should supersede those previously submitted with the application where applicable.
- GIA consented vs proposed floorspace schedule by unit (for information).
- GEA consented vs proposed floorspace schedule (for information).
- Mount Pleasant Approval in Principle to Camden Highways Technical Note prepared by Aecom and signature page (for information).
- Consented vs proposed overlay lower ground and basement plans and section drawings (drawing refs. 32875-05-002-A, 32875-05-006-A, 32875-03-B00-A and 32875-03-G00-A rev B) (for information).
- Plan drawings identifying the location of three units proposed to be reassigned from private to affordable rent units, as described further within this letter (drawing refs. 32875-P-03-004-Level 04-NMA-Tenure, 32875-P-03-005-Level 05-NMA-Tenure and 32875-P-03-G01-Level G01-NMA-Tenure).

The enclosed revisions are submitted following consideration of the consultation responses received in respect of the application from London Borough of Camden planning, housing and design officers. The key issues or queries that have been raised by officers concern the loss of social rent (i.e affordable rent) floorspace, potential changes to the affordable housing floorspace ratio, the revised extent of basement excavation, the scale of landscaping amendments and the introduction of new roof plant equipment. We understand these are the main issues that officers consider would affect their view on the materiality of the changes, and the revised proposals have been developed primarily to address these concerns. Some miscellaneous matters have also been positively addressed in the revised proposals as set out further within this letter.

The Applicant's response to each of the key issues is set out below.

1. Loss of social rent (affordable rent) floorspace and affordable floorspace ratio.

As submitted, the proposals resulted in an anticipated loss of 230sqm GIA social rent floorspace. This was proposed as the Applicant's chosen Registered Provider had requested that some oversized social rent units be reduced in size, reducing service charge liability, increasing efficiency and hence affordability of these units. Since the proposals have been submitted, the Applicant's architects have clarified that the actual loss was 197.9sqm GIA.

Officers have advised that while they do not object to the principle of reducing the size of the oversized consented social rent units, they cannot support the loss of social rent floorspace (by area and overall percentage), and that the proposed percentage tenure split must be at least 60:40 social rent/intermediate floorspace to comply with policy.

The Applicant has responded positively to these concerns in the revised proposals and is now proposing to convert 3 x private sale units to 3 x affordable rent units accessed from Core A1 (see drawing refs. 32875-P-03-004-Level 04-NMA-Tenure, 32875-P-03-005-Level 05-NMA-Tenure and 32875-P-03-G01-Level G01-NMA-Tenure). As demonstrated in the below table, this results in the total proposed social rent GIA sqm floorspace increasing marginally above the consented scheme. The proposed tenure split is 71/29 social rent/intermediate floorspace, meeting and exceeding the Council's preferred ratio, representing an improvement on the consented ratio. The overall percentage of affordable floorspace increases over the consented scheme (from 26.8% to 27.1%). These are significant benefits of the proposals that should outweigh any perceived diminution of private residential quality (the Applicant maintains their view that the proposed residential quality is an improvement on the consented scheme, as outlined in previous discussions).

	GIA (SQM)		
	Consented	NMA Submitted 14.02.18	NMA Revised Proposed
Social (Affordable Rent)	3604.7	3342.3	3608.3
Intermediate	1371.7	1436.2	1436.2
Total Affordable	4976.4	4778.5	5044.5
	Difference	-197.9	+68.1
Total Market	13569.21	13794.75	13528.75
Grand Total	18545.61	18573.25	18573.25

	GEA (SQM)		
	Consented	NMA Submitted 14.02.18	NMA Revised Proposed
Social (Affordable Rent)	4867.46	4844.9	5181.3
Intermediate	2094.14	2050.1	2050.1
Total Affordable	6961.6	6895.0	7231.4
	Difference	-66.6	+269.4
Total Market	22533.08	21920.8	21584.4
Grand Total	29494.68	28815.8	28815.7

Overall unit numbers remain the same as the consented scheme, but the scheme now provides three more affordable rent units and three fewer market units. The revised residential unit mix is proposed as follows:

Affordable (Intermediate) Units for Block A/P1 – Consented vs Revised Proposed:

Unit Type	Consented Units	Proposed Units	Difference
Studio	0	0	0
1 bed	18	18	0
2 bed	5	5	0
3 bed	0	0	0
4 bed	0	0	0
Total	23	23	0

Affordable (Affordable Rent) Units for Block A/P1 – Consented vs Revised Proposed:

Unit Type	Consented Units	Proposed Units	Difference
Studio	0	0	0
1 bed	1	1	0
2 bed	13	15	+2
3 bed	23	24	+1
4 bed	0	0	0
Total	37	40	+3

Private Units for Block A/P1 – Consented vs Revised Proposed:

Unit Type	Consented Units	Proposed Units	Difference
Studio	4	5	+1
1 bed	30	29	-1
2 bed	87	69	-18
3 bed	30	48	+18
4 bed	3	0	-3
Total	154	154	0

Total Units (All Tenures) for Phoenix Place Development – Consented vs Revised Proposed:

Unit Type	Consented Units	Proposed Units	Difference
Studio	5	6	+1
1 bed	89	88	-1
2 bed	179	163	-16
3 bed	68	87	+19
4 bed	4	1	-3
Total	345	345	0

Total Units (All Tenures) for Mount Pleasant Development – Consented vs Revised Proposed:

Unit Type	Consented Units	Proposed Units	Difference
Studio	5	6	+1
1 bed	174	173	-1
2 bed	368	352	-16
3 bed	109	128	+19
4 bed	25	22	-3
Total	681	681	0

A full GIA schedule of the affordable housing units is enclosed, as requested by officers.

2. Extent of basement excavation

As requested by officers, we enclose an overlay of the approved and revised proposed basement and lower ground floor plans and section drawings to demonstrate the extent of the proposed amendments to the two-storey basement design (drawing refs. 32875-05-002-A, 32875-05-006-A, 32875-03-B00-A and 32875-03-G00-A rev B). The drawings demonstrate that the proposed basement has predominately the same footprint as the consented. The wellness centre will require a greater level of excavation at lower ground level, however this is offset by a reduction in excavation at the basement level beneath Square P. In total, the consented scheme would involve 46,073m³ of excavation, whereas the proposed scheme involves 42,294m³, representing an 8.2% reduction. TWCL have advised that this could potentially result in approximately 6 to 8 weeks less time working in the ground. The basement construction phase is often the busiest in terms of vehicle movements on site, therefore there would be a tangible benefit to the impact on local residents.

Officers have noted that as the proposed basement footprint moves closer to the Phoenix Place site boundary than the consented, this may require an Approval in Principle. We can confirm that the London Borough of Camden have granted an Approval in Principle and the submission prepared by Aecom is enclosed with this letter along with the signature page for your information.

For the reasons described, the basement revisions are considered to be minor and they represent an improvement on the consented scheme by shortening the build programme, reducing lorry movements and other associated construction impacts and therefore reducing impacts upon residents. On this basis, a revised Basement Impact Assessment is not considered necessary.

3. Landscaping

The Applicant has reverted back to the consented landscaping scheme on the proposed drawings, which has been very marginally altered to accommodate changes to building entrances. As discussed with officers, the Applicant is committed to improving upon the consented landscaping design and will be bringing forward proposals separately for the Council's consideration under Condition 14 of the planning permission. We look forward to meeting with you to discuss these proposals separately in due course.

4. Introduction of plant equipment at roof level

New plant equipment was shown in some roof top locations on the submitted proposed drawings. No new roof plant equipment is shown on the revised drawings. As discussed and agreed with officers, roof plant details will be applied for separately under Condition 16.

5. Miscellaneous

Gough Street Elevation - lower ground floor level - infilling of the recess by the vehicle entrance

Officers objected to the infilling of the recess by the vehicle entrance. The proposals have been revised to maintain the recess, as shown on the enclosed revised proposed drawing ref. 32875-P-03-G01-Level G01-NMA.

Kitchens in lower ground floor duplexes

Officers objected to the alterations to the layout of ground floor duplexes. The Applicant has responded by reverting the units back to a similar layout to the consented scheme and this is shown on the enclosed proposed revised drawing ref. 32875-P-03-G00-Level G00-NMA.

Changes in GIA

Officers have requested clarification on the proposed changes in GIA. The Applicant's architects have confirmed there is no overall increase in built up area – the net area increase has come from reductions in circulation and elevator cores. A full breakdown of the consented and proposed GIA and GEA floorspace figures is enclosed for information.

Ancillary spaces

Officers queried whether new proposed ancillary residential spaces could be converted to residential floorspace in the future. The Applicant is open to the principle of a condition preventing these spaces from being converted subject to agreeing appropriate wording with the Council.

Discrepancies on drawings

Officers identified a number of discrepancies on the submitted proposed drawings set. These have been addressed on the enclosed proposed revised drawing set.

Discrepancy on DP9 application submission cover letter dated 14.02.18

We confirm that the reference to Condition 32 was made in error. Only Conditions 21, 30 and 31 are proposed to be varied as set out within that letter.

Cycle parking

TWCL are pleased that officers acknowledge cycle parking is improved overall. In terms of the pinch point issue identified, we can confirm the intent is to clearly demarcate pedestrian circulation to avoid any issues and more detailed proposals will be submitted to support this under Condition 19.

Courtyard West Elevation Drawing

Officers queried why the proposed A2 core rises directly behind the parapet, whereas in the approved design the core is set back. Broadway Malyan have confirmed their elevation is drawn correctly and will appear different to the consented elevation which contained discrepancies between plan and section, as previously discussed with officers. We understand that this is not an issue.

Conclusion

The Applicant has responded positively to officers' concerns as set out within this letter. The revised proposals provide three additional social rent affordable housing units which is considered a significant benefit of the proposals. The proposed scheme amendments are minor and do not result in the development becoming contrary to planning policies or impacting upon important material considerations made in the determination of the application, and we therefore remain of the view that the changes are non-material in nature and capable of being determined via a S96a application for amendments to the scheme.

We trust the enclosed documentation provides you with sufficient information to reconsider the proposals. Should you have any further queries, we are happy to arrange a meeting to discuss these in more detail in line with the terms of the Post Approval Agreement between the Applicant and the Council. In the meantime, should you require any further information, please contact Tom Hawkey of this office at the above address.

Yours sincerely,

DP9 Ltd

DP9 Ltd

Enc.

Cc. Neil McDonald London Borough of Camden