



**Planning Statement for Section 73 Application
to vary condition 2 of planning permission
LPA Ref. 2017/1407/P**

In respect of

140-146 Camden Street, Camden, London, NW1 9PF

On behalf of

Elebro Ltd

June 2019

QUALITY MANAGEMENT

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Date:	June 2019

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1 INTRODUCTION

1.1 This statement has been prepared on behalf of, Elebro Ltd, in support of a Section 73 planning application to vary condition 2 (the approved plans) of planning permission 2017/1407/P, which was approved on 28th November 2017. This varied condition 25 attached to the original planning permission 2014/7908/P which granted consent for:

“demolition of existing buildings, excavation of extension to existing single storey basement and erection of 1 – 8 storey building comprising 2,026sqm of commercial floorspace (flexible B1 use class) and 52 residential units (4 x studio, 19 x 1-bed, 18 x 2-bed, and 11 x 3-bed C3 use class) with associated landscaping”.

1.2 The proposed amendments largely relate to the internal layout of the consented scheme in relation to the proposed housing mix and the simplification of the cores serving the residential, although there are some consequential minor changes to the elevations.

1.3 The proposed amendments bring about a number of benefits, which are additional to those recognised in the previous consent. These include:

- 36 high-quality dwellings, including 12 affordable units;
- Over 2,000sqm of new flexible office space, providing space for up to 167 full-time employees;
- Activation of the canal edge and regeneration of an unsightly existing site;
- Provision of at least one balcony per flat;
- Provision of 343.6sqm of external terrace space, an increase of 172.6sqm;
- No material changes to the elevations or external areas;
- No change to the overall building footprint;
- Increased deliverability of the scheme – RP have confirmed that the proposed amended affordable housing layout is more deliverable than the consented; and
- The preservation of neighbouring amenity

1.4 The application proposals have been subject to discussions with Kristina Smith of the London Borough of Camden (hereafter the Council) through a Post Approval Agreement relating to planning permission 2014/7908/P.

1.5 As a result of the PPA discussions, the scope of this Section 73 application was agreed with the planning officer on 20th June 2019. A Deed of Variation to the S106 will accompany this Section 73 application. This is further detailed in section 3.

1.6 Therefore, the supporting documentation submitted with this application includes:

- The completed application forms;
- The required fee of £234.00;
- Site Location Plan at 1:1250; and
- Drawings and schedules prepared by Chassay + Last Architects:
 - Section 73 Minor Material Amendments Proposed Plans, Elevations & Sections document;
 - CSC6/GD4/ROOF TERRACE COMPARISON/250619;
 - CSC6/GD4/S73 RESIDENTIAL UNITS;
 - CSC6/GD4/RESI GIA COMPARISON/020719; and
 - Comparison Document CSC5/S1NMA vs CSC6/S73.
- Planning statement prepared by ROK Planning.

1.7 The report is structured as follows:

- Section 2.0 describes the application site and surroundings;
- Section 3.0 details relevant planning history and the evolution of the application;
- Section 4.0 sets out the planning policy of relevance;
- Section 5.0 provides an analysis of the planning considerations in relation to the changes to the scheme; and
- Section 6.0 concludes that the proposed development complies with relevant development plan policy and will deliver significant planning benefits.

2 SITE AND SURROUNDINGS

- 2.1 The application site is located on the corner of Camden Street and Bonny Street, on the edge of Camden Town. Planning permission 2014/7908/P granted consent for the following development which was subsequently retained through the Section 73 application to vary condition 25 of the original planning permission (LPA Ref. 2017/1407/P):
- 2,026 sq m commercial space (flexible Use Class B1);
 - 52 residential units made up of:
 - 4 x studio units;
 - 19 x 1-bed units;
 - 18 x 2-bed units; and
 - 11 x 3-bed units.
 - 12 affordable housing units made up of:
 - 6 social rented units; and
 - 6 shared ownership units.
- 2.2 The development site is located approximately 320 metres from the defined edge of Camden Town Centre which offers a vibrant and exciting area to live within London. As Camden Town is a short walk from the site, the completed development will benefit from a diverse range of shopping, cultural and leisure facilities.
- 2.3 Prior to the demolition of the buildings, built development comprised two separate 1950s commercial warehouse buildings: i) a single storey brick-built warehouse building with an informal internal mezzanine on the corner of Camden Street and Bonny Street; and ii) a two and three storey office building which abuts the Regents Canal. These buildings have been demolished as part of the implementation of planning permission 2014/7908/P.
- 2.4 Built development adjoining the site includes a nineteenth century terrace of residential dwellings including 2 – 8 Bonny Street. The dwellings are three storeys in height, grade II listed and located in the Regents Canal conservation area. The further surrounding area comprises a mix of residential and commercial uses.
- 2.5 There are also a number of schools, health services and community facilities within close proximity to the site which makes the area ideal for both young professionals and families.
- 2.6 The site has a PTAL score of 6b and is within a short walking distance from Camden Town Overground (85 metres) and Camden Tube Station (480 metres) which links the site to the wider London area. Camden Street and Camden Road are main bus corridors through the area and the site benefits from a number of bus stops located within close proximity

including Camden Gardens and Camden Roads.

3 PLANNING HISTORY AND EVOLUTION OF THE PROPOSALS

- 3.1 Planning permission 2014/7908/P was granted on 11th May 2016 for *“Demolition of existing buildings, excavation of extension to existing single storey basement and erection of 1 - 8 storey building comprising 2,026sqm of commercial floorspace (flexible B1 use class) and 52 residential units (4 x studio, 19 x 1-bed, 18 x 2-bed and 11 x 3-bed C3 use class) with associated landscaping.”*
- 3.2 This planning permission (LPA Ref. 2014/7908/P) was subsequently amended by a Section 73 application (LPA Ref. 2017/1407/P) for the variation of condition 25. This originally required a single contract for demolition and construction of the development to be submitted to the Council. The condition was varied to allow for separate contracts to be let for demolition and construction, which was required due to the number of unknowns which needed further investigatory work to be undertaken following the demolition of the existing buildings. This Section 73 was granted consent on 28th November 2017 alongside a Deed of Variation to the Section 106 agreement.
- 3.3 A Non Material Amendment (hereafter NMA1) (LPA Ref. 2017/6720/P) for *“alterations to Block A lightwell and railings, omission of GF balcony, removal of courtyard lightwell, repositioning of Block B access, re-arrangement of wheelchair unit at GF, lighting design, addition of private terraces in courtyard, security fencing, commercial access repositioned, GF recess omitted, stair access to communal terrace added, changes to window design and faience columns and repositioning of lift”* was approved on 9th February 2018.
- 3.4 Planning permission (LPA Ref. 2017/1407/P) was then implemented in April 2019, through the demolition of the existing buildings.
- 3.5 A Post Approval Agreement was signed by the Council on 6th June 2019, which originally covered any outstanding conditions and obligations, as well as a further Non-Material Amendment application and this further Section 73 application.
- 3.6 A further Non-Material Amendment application (LPA Ref. 2019/2549/P – hereafter NMA2) was submitted to the Council on 16th May 2019. This NMA application was subject to extensive discussions with Kristina Smith as part of the Post Approval Agreement (PAA). The amendments proposed through this NMA primarily related to the rearrangement of the cores to enable construction contracts to be in place for the superstructure and improve the efficiency of the building. However, following further discussions, the recent proposed NMA amendments have been incorporated into this Section 73 application, which is also subject to the same PAA.

3.7 The scope and principle of this Section 73 application has therefore been agreed with the planning officer on 20th June 2019.

4 APPLICATION PROPOSALS

- 4.1 The amendments to the consented scheme which form part of this application comprise:
- Revisions to housing mix;
 - Internal reconfiguration to create larger unit sizes;
 - Redesign of the building cores;
 - Repositioning of staircases and lifts to suit cores amendments;
 - Relocation and rearrangement of substation, refuse store, cycle storage, plant room, and cycle lift;
 - Revision of first floor roof area including redesign of rooflights; and
 - General amendments to the internal layout to suit new service core arrangement.
- 4.2 The proposed amendments are detailed further in section 6. As the development has progressed there has been the usual assessment of the building at the pre-construction stage. This has identified the opportunity for the redesign of the proposed building's cores and superstructure to enhance the efficiency of the building.
- 4.3 Similarly, market research has identified an oversaturation of smaller units within Camden and particularly Camden Town and so amendments to the unit sizes to diversify the housing offer within the Borough are also proposed. This has therefore resulted in the proposal providing predominantly larger units suitable for families with higher levels of internal and external communal amenity space.
- 4.4 In addition, following advice from an RSL, a single core has been proposed for the affordable housing units to serve Block A and B. This previously served private units under the consented scheme; however, the RSL has indicated that it is their preference to have separate cores for affordable and private units. The option of providing separate cores of the intermediate and social rented tenures was offered to the RSL however for management and service charge reasons their preference was a single lift for both tenues. This has therefore also influenced the layout of the larger private units in Block C whilst ensuring the units provide a high-quality residential environment and are dual aspect.
- 4.5 As the core for Block A and B is proposed to be combined, this has resulted in the omission of one of the lift overruns along Bonny Street. This is considered a positive amendment to the overall appearance of the development from Bonny Street.
- 4.6 The affordable floorspace remains as consented in terms of its quantum and tenure split, however the floorspace has been reconfigured over the floors in Block A and B. This has resulted in the removal of the social rented wheelchair unit at ground floor level and its

relocation to first floor level. The combined entrance lobby to Blocks A and B is now proposed along Bonny Street. In addition, this affordable wheelchair unit is now served by two lifts, whereas previously it was only served by one lift, this provides a further positive amendment to the scheme.

- 4.7 Through the reconfiguration of the consented external and internal floorspace, additional internal communal amenity space is now provided, alongside a gym for residents. Furthermore, as a consequential amendment to the housing mix, the existing private terraces are now proposed to be communal and have been re-positioned and enlarged accordingly which provides further improvements to the amenity space for the future occupiers.
- 4.8 The residential entrance along Camden Street serves Block C and has been reconfigured to create a larger residential lobby, glazed frontage and associated canopy which wraps around Block C to the canal frontage.
- 4.9 Consequently, the amendments proposed in this application therefore involve various minor design changes, and these are further outlined within the design documents and drawings prepared by Chassay + Last Architects and submitted with this application.
- 4.10 A list of the original superseded plans, the existing approved NMA plans, and the plans that form part of this application is outlined in Table 1:

Table 1 - List of drawing variations

LPA ref. 2014/7908/P	LPA ref. 2017/1407/P (s73.1)	LPA ref. 2017/6720/P (NMA1)	Section 73.2
D-CSC3-A110-Rev.D: Proposed Location Plan		D-CSC3-A110-Rev.E: Proposed Location Plan	D-CSC3-A110-Rev.G: Proposed Location Plan
D_CSC3-A111-Rev.D: Proposed Site Plan		D-CSC3-A111-Rev.E: Proposed Site Plan	D-CSC3-A111-Rev.G: Proposed Site Plan
D-CSC3-A112-Rev.E: Proposed Lower Ground Floor Plan (Canal Level)		D-CSC3-A112-Rev.F: Proposed Lower Ground Floor Plan (Canal Level)	D-CSC3-A112-Rev.J: Proposed Lower Ground Floor Plan (Canal Level)
D-CSC3-A113-Rev.F: Proposed Ground Floor Plan (Street Level)		D-CSC3-A113-Rev.G: Proposed Ground Floor Plan (Street Level)	D-CSC3-A113-Rev.K: Proposed Ground Floor Plan (Street Level)
D-CSC3-A113-Rev.E: Proposed First Floor Plan		D-CSC3-A113-Rev.F: Proposed First Floor Plan	D-CSC3-A114-Rev.J: Proposed First Floor Plan
D-CSC3-A115-Rev.E: Proposed Second Floor Plan		D-CSC3-A115-Rev.F: Proposed Second Floor Plan	D-CSC3-A115-Rev.J: Proposed Second Floor Plan
D-CSC3-A116-Rev.E: Proposed Third Floor Plan		D-CSC3-A116-Rev.F: Proposed Third Floor Plan	D-CSC3-A116-Rev.J: Proposed Third Floor Plan
D-CSC3-A117-Rev.E: Proposed Fourth Floor Plan		D-CSC3-A117-Rev.F: Proposed Fourth Floor Plan	D-CSC3-A117-Rev.J: Proposed Fourth Floor Plan

D-CSC3-A118-Rev.E: Proposed Fifth Floor Plan	D-CSC3-A118-Rev.F: Proposed Fifth Floor Plan	D-CSC3-A118-Rev.J: Proposed Fifth Floor Plan
D-CSC3-A119-Rev.E: Proposed Sixth Floor Plan	D-CSC3-A119-Rev.F: Proposed Sixth Floor Plan	D-CSC3-A119-Rev.J: Proposed Sixth Floor Plan
D-CSC3-A120-Rev.E: Proposed Seventh Floor Plan	D-CSC3-A120-Rev.F: Proposed Seventh Floor Plan	D-CSC3-A120-Rev.J: Proposed Seventh Floor Plan
D-CSC3-A121-Rev.E: Proposed Roof Plan	D-CSC3-A121-Rev.F: Proposed Roof Plan	D-CSC3-A121-Rev.J: Proposed Roof Plan
D-CSC3-A122-Rev.B: Proposed Cycle Storage (Lower Ground and Ground Levels)	D-CSC3-A122-Rev.C: Proposed Cycle Storage (Lower Ground and Ground Levels)	/
D-CSC3-A123-Rev.B: Proposed Waste Management (Refuse and Recycling Storage)	D-CSC3-A123-Rev.C: Proposed Waste Management (Refuse and Recycling Storage)	/
D-CSC3-A211-Rev.D: Proposed South & West Context Elevation	D-CSC3-A211-Rev.E: Proposed South & West Context Elevation	D-CSC3-A211-Rev.G: Proposed South & West Context Elevation
D-CSC3-A212-Rev.E: Proposed North and East Context Elevation	D-CSC3-A212-Rev.F: Proposed North and East Context Elevation	D-CSC3-A212-Rev.H: Proposed North and East Context Elevation
D-CSC3-A213-Rev.E: Proposed West Elevation	D-CSC3-A213-Rev.F: Proposed West Elevation	D-CSC3-A213-Rev.H: Proposed West Elevation
D-CSC3-A214-Rev.D: Proposed South Elevation	D-CSC3-A214-Rev.E: Proposed South Elevation	D-CSC3-A214-Rev.G: Proposed South Elevation
D-CSC3-A215-Rev.E: Proposed East Elevation	D-CSC3-A215-Rev.F: Proposed East Elevation	D-CSC3-A215-Rev.H: Proposed East Elevation
D-CSC3-A216-Rev.E: Proposed North Elevation	D-CSC3-A216-Rev.F: Proposed North Elevation	D-CSC3-A216-Rev.H: Proposed North Elevation
D-CSC3-A311-Rev.D: Proposed Section AA	D-CSC3-A311-Rev.E: Proposed Section AA	D-CSC3-A311-Rev.G: Proposed Section AA
D-CSC3-A312-Rev.C: Proposed Section BB	D-CSC3-A312-Rev.D: Proposed Section BB	D-CSC3-A312-Rev.F: Proposed Section BB
D-CSC3-A313-Rev.C: Proposed Section CC	D-CSC3-A313-Rev.D: Proposed Section CC	D-CSC3-A313-Rev.F: Proposed Section CC
D-CSC3-A314-Rev.E: Proposed Section DD	D-CSC3-A314-Rev.F: Proposed Section DD	D-CSC3-A314-Rev.H: Proposed Section DD
D-CSC3-A315-Rev.A: Proposed Section EE	D-CSC3-A315-Rev.A: Proposed Section EE	D-CSC3-A315-Rev.C: Proposed Section EE

***note that the consented drawings were not amended through the subsequent Section 73 application (LPA Ref. LPA Ref. 2017/1407/P).

5 RELEVANT PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Specifically, Section 38(6) states:

‘If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise’.

Development Plan

5.2 Development Plan documents relevant to the proposals comprise:

- The London Plan (2016);
- London Borough of Camden Local Plan (2017), and
- London Borough of Camden Policies Map (2016).

Material considerations

5.3 The following planning policy and guidance documents may be considered to form material considerations in the determination of the planning application:

- National Planning Policy Framework (2019); and
- Planning Practice Guidance (live online resource, last updated 2019);

5.4 Relevant Camden Planning Guidance Supplementary Planning Guidance (CPG):

- CPG Design (2019);
- CPG Interim Housing (2019);
- CPG 2 Housing (2019)
- CPG Amenity (2018); and
- CPG Transport (2019).

5.5 Supplementary Planning Guidance (SPGs) prepared by the Greater London Authority (GLA):

- Housing (2016); and
- Character and Context (2014).

Site designations

5.6 The site is located within the Jeffrey’s Street Conservation Area.

5.7 The site is located in Flood Zone 1.

6 PLANNING CONSIDERATIONS

6.1 This section sets out the planning considerations in respect to the proposed amendments to the scheme and assesses these against the national, regional and local planning policy context. The key considerations which are the subject of this Section 73 application are:

- Housing mix;
- The consequential residential environment;
- The quantum and tenure split of the affordable housing;
- Consequential amendments to the internal layouts and elevations in terms of design; and
- Amenity of adjacent residents.

Housing Mix

Planning policy position

6.2 Policy H1 'maximising housing supply' states that the Council's priority land-use is self-contained housing, therefore, the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding their housing targets.

6.3 Policy H6 'housing choice and mix' states that the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households.

6.4 Policy H7 of the Camden Local Plan, 'large and small homes', states that the council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The Council will seek to ensure that all housing developments;

- Contribute to meeting the priorities set out in the dwelling size priorities table; and
- Include a mix of large and small homes.

6.5 The policy notes that the Council will take a flexible approach to assessing the mix of dwellings sizes proposed in each development having regard to:

- The different dwelling size priorities for social-affordable rented, intermediate and market homes;
- Any evidence of local needs that differ from borough wide priorities; and

- The size of the site and any constraints on developing the site for a mix of homes of different sizes.

6.6 The supporting policy text defines large homes as homes with 3 bedrooms or more, and small homes as homes that are studios or have 1 or 2 bedrooms. Adopted London Plan Policy 3.8 'Housing Choice' also states that account should be taken of the needs of particular communities, including those with large families. Similarly, draft London Plan Policy H12 'Housing Size Mix' also states that schemes should generally consist of range of unit sizes, and that the range of housing should be identified by local needs.

6.7 The dwelling size priority table (table 3), referenced in Camden's Local Plan Policy H7, identifies dwelling size priorities. However, the Council also acknowledges that there is a need and demand for dwellings of every size shown in the table, and that they expect most developments to include some homes that have been given a medium or lower priority level.

Table 3 of Policy H7 Camden Local Plan

	1-bed studio	or	2-bed	3-bed	4-bed
Social-affordable rented	Lower		High	High	Medium
Intermediate affordable	High		Medium	Lower	Lower
Market	Lower		High	High	Lower

6.8 The supporting policy text at paragraph 3.186 also acknowledges that Camden's existing stock of homes is made up largely of relatively small dwellings. The 2011 Census data indicates that 70% of Camden households live in homes with two bedrooms or fewer, rising to 75% for households in social rented housing. Census data shows that the average household size in Camden grew from 2.06 in 2001 to 2.18 in 2011. In the same period the proportion of 1-person households fell from 46% to below 41%. In 2011, Camden's household composition was 40.5% 1-person households, 42.6% households comprising one family only (including 19.0% with dependent children) and 16.9% other household types such as unrelated people sharing a flat.

Assessment

6.9 The Section 73 application proposes to vary the housing mix to provide a higher proportion of larger units. This is set out in the below table (Table 2) below:

Table 2 – Comparison of Housing Mix

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	LPA ref. 2014/7908/P		LPA ref. 2017/6720/P		Section 73	
	No. of units	Percentage	No. of units	Percentage	No. of units	Percentage
Private Units	40	77%	40	77%	24	67%
Studio/1-bed	17	32.7%	17	32.7%	0	0%
2-bed	15	28.8%	15	28.8%	5	14%
3-bed	8	15.4%	8	15.4%	5	14%
4-bed	0	0	0	0	14	39%
Affordable units	12	23%	12	23%	12	33%
Studio/1-bed	6	11.5%	6	11.5%	4	11%
2-bed	3	5.8%	3	5.8%	5	14%
3-bed	3	5.8%	3	5.8%	3	8%
4-bed	0	0	0	0	0	0

6.10 Firstly, it should be considered that in terms of the proposed amendments to the housing mix that the key indicators of the scheme remain as per the consented scheme:

- The total floorspace of the proposed development has been retained and accommodated in the consented building footprint and envelope;
- The residential floorspace has increased from 4,672.1 sq m to 4,733.5 sq m within the consented building envelope due to reconfiguration of spaces which is detailed in the design section of this planning statement;
- In terms of the residential floorspace, the proposed split between private floorspace and affordable floorspace has remained the same as consented. Private housing floorspace provision is 76% and affordable housing floorspace provision is 24% (GIA); and
- In addition, the tenure split of the affordable housing floorspace is to remain as consented and deliver 6 social rented units and 6 shared ownership units.

6.11 It should be noted that whilst the affordable housing floorspace has increased this has not impacted upon the percentage split. This is further detailed in the affordable housing analysis below.

6.12 The notable amendments to the private housing mix are as follows:

- The reduction in overall private units from 40 to 24 units;
- The removal of studios and 1 bedroom flats from the proposals;
- The reduction in 2 bed flats from 15 to 5;

- The reduction in 3 bed flats from 8 to 5; and
- The introduction of 14, 4 bed flats.

6.13 The amendments proposed to the affordable housing mix are dealt with separately but the floorspace of these remains as consented under LPA Ref. 2017/1407/P. Notably, floorspace has been reconfigured across Blocks A and B, which has resulted in an amendment to the affordable housing mix as follows:

- The reduction in studio and 1 bed units from 6 to 4;
- The increase in 2 bed units from 3 to 5 units; and
- 3 bed units remain as consented.

6.14 The amended housing layouts have been incorporated within the consented building's footprint and envelope, certain units are slightly larger in size to ensure that the layouts are efficient and of a high quality. Overall, there are a higher number of private larger units proposed compared to the consented scheme which are considered to be suitable for families. The proposal has therefore sought to provide a variety of housing for existing and future households and this is assessed against the policies outlined above in the following paragraphs, which includes; housing supply (H1), housing choice and mix (H6) and small and large homes (H7).

Housing supply

6.15 The amendments to the scheme will result in a very similar population being generated from the proposed development and therefore contribute to the Council's overall housing supply in accordance with Policy H1 'housing supply'. This will largely stay the same for the private units as permitted with the number of habitable rooms decreasing slightly from 109 to 105 whilst, the number of habitable rooms provided within the affordable units will increase from 31 to 33. Overall there will be a reduction in 2 habitable rooms across the development as a result of the amendments proposed to the housing mix, and the proposal will provide 138 habitable rooms. Therefore, this will provide a very similar population to that of the consented scheme and maximise the delivery of housing whilst also having considerations to the needs of existing and future households in accordance with Local Plan Policy H1 'housing supply'.

Housing mix and choice and small and large homes

6.16 The provision of predominantly larger units in comparison to the consented scheme has been the result of market research. This has identified that the majority of units which have been consented in the adjoining parts of the Borough, and that are currently undergoing construction, are smaller units i.e. 1 and 2 bed flats. The Council have even acknowledged in their supporting policy text of H6 at paragraph 3.186, that their existing stock of housing

is largely made up of relatively small dwellings. This is further demonstrated by the following developments which are within close proximity to the application site:

- Morrisons Supermarket – 573 new homes - LPA Ref 2017/3827. Of the planning permission 84.1% are of smaller residential units, comprising; 10.8% studios, 36.5% 1 beds and 36.8% 2 beds;
- Barratts at Camden Courtyard — 164 homes – LPA ref Ref. 2013/7646/P. Of the planning permission 88.1% are of smaller residential units, comprising; 32.3% 1 beds and 55.8% 2 beds;
- Hawley Wharf – 200 new homes – 164 one and two beds and 30, three beds – LPA Ref: 2011/4932/P. Of the planning permission 88.2% are of smaller residential units, comprising; 32.3% 1 beds and 55.8% 2 beds;
- Slightly further afield Agar Grove – 493 homes of which 240 are private – Camden’s own scheme – LPA ref 2013/8088. Of the planning permission 83.6% are smaller residential units, comprising; 4.3% studios, 38.7% 1 bed units and 40.6% 2 bed units.

6.17 This further market research provides evidence that there is a large number of smaller units being constructed and imminently coming onto the market. Therefore, this provides a key driver to diversify away from the provision of further smaller units to provide housing choice and mix which will contribute to creating a mixed, inclusive and sustainable community in Camden Town in accordance with Local Plan Policy H6 ‘Housing Choice and Mix’.

6.18 In terms of assessing the amended private housing mix against Table 3 of Local Plan Policy H7, the proposal provides 58% as 4 bed units. Whilst this is deemed as a lower priority in the table, as set out above there is evidence of predominantly smaller units being consented and delivered in the locality and wider Borough, therefore there is a requirement to diversify the market.

6.19 In addition, there are other factors which have driven the provision of these larger units which should be considered to support the flexible approach that the Council takes in assessing housing mix including:

- The amendments to the housing mix have been accommodated within the consented building envelope and following discussions with RSLs, it is apparent that they require separate cores for the affordable and private units albeit these were previously combined under the consented scheme (LPA Ref. LPA Ref. 2014/7908/P and 2017/1407/P). Therefore, as a result of their feedback, the private units now have one core. The residential units which previously shared a core with the affordable, have now been incorporated into the private core and resulted in larger four bed units. These have been designed to ensure that they are dual aspect which is evident on the proposed plans and has dictated their slightly larger sizes; and

- The Elebro business model - is also an important driving factor behind these proposals. The model seeks to diversify the market where possible, providing high quality larger units alongside significant levels of internal and external communal space, beyond that provided as private amenity space.

6.20 The amended private mix also provides 21% of 2 bed units and 21% of 3 bed units which are considered to be a high priority within the borough, therefore the amendments to the housing mix respond positively to housing priority table 3 referenced in Local Plan Policy H7, which aims to deliver both small and larger units.

6.21 Whilst the proposal will result in the loss of smaller 1 bed units, these are deemed a lower priority and the provision of 2 and 3 bed units meets the higher priority needs. As set out above, the proportion of larger units is justified against policy and a flexible approach has been taken to consider the building envelope of the consented scheme, market considerations, feedback from RSLs and dwelling size priorities.

6.22 In conclusion, the amendments proposed through this Section 73 application will enable the layout and structure of the building to be far more efficient and functional whilst enhancing a number of aspects of the development. Furthermore, the enlarged unit sizes will bring the development further in line with Local Plan Policy H6 and H7 and provide an increase in the availability of currently underprovided larger units in Camden and diversifying the existing housing supply.

Residential environment

Housing space standards

6.23 The proposed units meet and exceed the minimum housing space standards as set out in Table 3.3 of the adopted London Plan Policy 3.5. A detailed schedule prepared by Chassay + Last details the units by size confirms this.

Amenity Space

6.24 Local Plan Policy A2 'open space' states that the Council will seek to secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough's network of open space. The priority is to secure new public open space on-site, with the provision off-site near to the development only considered acceptable where provision on-site is not achievable. The Council apply a standard of 9 sq m per occupant for residential schemes and 0.74 sq m for commercial floorspace, whilst also taking into account any funding for open spaces through the Community Infrastructure Levy.

6.25 Through the consented scheme it was considered that the proposed development would

result in additional residents and an associated increase in demands on existing local open space which was covered by the CIL and associated costs of such infrastructure. The CIL payment was made to the Council on the implementation of the planning permission and given the number of occupants remains as permitted there is no requirement to provide open space on site further to that consented.

6.26 Notwithstanding this, through the amendments to the unit layouts, a number of the private and communal terraces have been reconfigured. This has resulted in an increase in external terrace areas from 171 sq m to 343.6 sq m and is largely due to the reduction of private terraces as these no longer serve individual flats. This has incurred the following amendments to each of the terraces which is illustrated on the comparison drawings prepared by Chassay + Last;

- Courtyard terrace has been omitted;
- Third floors terraces on Block C are now provided as a combined communal terrace which has increased from 85.3 sq m to 157.4 sq m;
- Fifth floor terraces on Block B are now provided as a combined communal terrace which has increased from 45.3 sq m to 109 sq m; and
- A communal terrace has been introduced at seventh floor which is 77.2 sq m.

6.27 Overall, the revisions to the consented roof terraces to create combined communal roof terraces creates a positive change to the development and introduces additional amenity space which can be enjoyed by the future occupants in accordance with Local Plan Policy A2 'open space'. This is in addition to the CIL payment which has been made with regards to associated costs of open space infrastructure. The roof terraces have remained in the same locations as consented and it is their use which is proposed to change (from private to communal), therefore there will be no associated impact upon the amenity of surrounding occupiers to that of the consented scheme.

6.28 The London Plan Housing SPG at standard 26 states that a minimum of 5 sq m of private outdoor space should be provided for 1 – 2 person dwellings and an extra 1 sq m should be provided for each additional occupant. Standard 27 requires the minimum depth and width for all balconies and other private external spaces should be 1500 mm.

6.29 Each of the proposed flats includes at least one or more balconies to provide private amenity space for each of the future residents. The balcony sizes have been reviewed as part of this application to provide sufficient private amenity space for each of the units. A detailed schedule of the balconies has been prepared by Chassay + Last and confirms the balcony sizes and associated increases to accord with the number of occupants as set out in standard 26 and 27 of the London Plan Housing SPG.

Affordable Housing

Planning policy position

6.30 Local Plan Policy H4 'Maximising the supply of affordable housing', states that the Council will aim to maximise the supply of affordable housing and exceed a borough wider strategic target of 5,300 additional dwellings from 2016 – 2031. They will also aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. Part 'o' of the policy states that the Council will take into account the economics and financial viability of the developments.

Assessment

6.31 The key provisions of affordable housing floorspace under the consented under planning permission Ref. 2017/1407/P have been retained, including the overall affordable housing floorspace provision of 24% (GIA).

6.32 The affordable floorspace is proposed to be re-configured between Block A and B up to the third and fourth floors respectively and has resulted in a slight increase in floorspace in tenures. However, this has not affected the overall floorspace percentage of affordable floorspace. This should be viewed as a positive of the scheme alongside the amendments to the proposed affordable housing mix, which provides 2 larger social rented units. The amendments to the housing mix have replaced 2 no. 1 bed units with 2 no. 2 bed units as set out in the analysis above.

6.33 In terms of the affordable housing tenure floorspace, this has increased as a consequence of the combined cores as follows:

- The social rented floorspace has increased from 485 sq m to 487.3 sq m; and
- The shared ownership floorspace has increased from 322 sq m to 338.3 sq m.

6.34 The applicant has engaged with an RSL regarding the affordable units and the design amendments have been driven by their advice and preference with a view to acquiring the units. The key amendment here is the provision of one core to both block A and B. One lift is proposed here for the core but will be accessed independently with the exception of the social rented wheelchair unit. Although, the floorspace remains as consented this has been reorganised over blocks A and B to respond to the RSL advice regarding the units.

6.35 The key amendment to the affordable floorspace is to unit A.M.1 (social rented) permitted at ground floor under the consented scheme, which has been relocated to first floor level at A.1.2. Therefore, only the residential entrance to the intermediate and social rented units will be located at the ground floor of Bonny Street. In addition, unit A.1.2 now benefits from two lifts compared to that consented through the inclusion of a lift core. Unit A.1.1 (social

rented) now also benefits from the provision of lift access.

- 6.36 In terms of the management of the social rented and intermediate housing, the tenures will share the lift which will serve the single core. However, this will have key fob access which will ultimately provide management between the tenures. In terms of the service charge this will be apportioned across the tenures of the core based on proportion of ownership. This is a standard approach in mixed tenure building and cores.
- 6.37 Overall, the provision of affordable housing floorspace will remain as consented through the consented scheme at the site and support the supply of affordable housing in the Borough in accordance with Local Plan Policy H4 'affordable housing'. The applicant has engaged positively with an RSL and adapted the affordable floorspace to suit their needs to ensure the units can be acquired and delivered in the near future. The amendments to the affordable housing mix provide further benefit to the future occupiers of the units and the surrounding occupiers of the properties along Bonny Street.

Consequential Amendments to the Internal Areas and Elevations

Planning policy position

- 6.38 Local Plan Policy D1 'design', states that the Council will seek to secure high quality design in development, having consideration to the following:
- respects local context and character;
 - preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
 - is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
 - is of sustainable and durable construction and adaptable to different activities and land uses; e. comprises details and materials that are of high quality and complement the local character;
 - integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
 - is inclusive and accessible for all;
 - promotes health;
 - is secure and designed to minimise crime and antisocial behaviour;
 - responds to natural features and preserves gardens and other open space;
 - incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,

- incorporates outdoor amenity space;
- preserves strategic and local views;
- for housing, provides a high standard of accommodation; and
- carefully integrates building services equipment.

6.39 Policy D2 'heritage' states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Assessment

6.40 As set out previously, the proposed amendments to the housing mix have been accommodated within the consented building footprint and envelope. The appearance and materials of the proposal will also remain as consented. Therefore in terms of the design of the proposed development, this will remain largely the same as the consented scheme and will continue to respect the local context and character and positively contribute to the immediate area in design terms and accord with Local Plan Policy D1 'design' and Local Plan Policy D2 'heritage'.

6.41 The amendments to the housing mix have largely resulted to amendments to the internal layouts, however, there have been some consequential impacts upon the elevations of the development. The internal amendments to the scheme do not require planning permission, however, for information have been detailed below and are illustrated on Chasay + Last's supporting drawings. The internal amendments to the housing layouts have cause consequential impacts on the external elevations which are set out and assessed at above or below.

6.42 The internal amendments include:

1. Lower ground and ground floor:
 - a. Core B lift and staircase has been repositioned and the core for Blocks A and B has been combined;
 - b. The wheelchair affordable unit has been relocated to first floor;
 - c. The cycle store has been combined for Blocks A and B, however, provides the same level of cycle parking to the consented scheme;
 - d. The cycle store for Block C has been repositioned, however, provides the same level of cycle parking to the consented scheme ;
 - e. The staircase to the ground floor commercial floorspace has been amended and repositioned and at ground floor level the voids have been removed;
 - f. The plant room has been relocated to the ground floor;

2. First floor plan;
 - a. Core A and B combined, and Core B lift and staircase have been repositioned;
 - b. The affordable wheelchair unit is now proposed at first floor level;
 - c. Consequential amendments to the party walls due to the mix of flats in Block A, B and C;
3. Second floor plan – this reflects the above amendments regarding the combining of Core A and B and the mix of flats;
4. Third floor plan – this reflects the above amendments and includes further amendments along with the provision of a resident's garden room and gym in Block C;
5. Fourth floor plan – the mix of flats in Block C has been amended;
6. Fifth floor plan - the mix of flats in Block C has been amended;
7. Sixth floor - the mix of flats in Block C has been amended;
8. Seventh floor – the mix of flats in Block C has been amended. In addition, a residents lounge has been included and part of the private terrace has been converted to a communal terrace.

6.43 These amendments have incurred an increase in the commercial floorspace by 72.8 sq m from 2,064.5 sq m to 2,137.3 sq m within the consented building envelope. This is due to the reduction in plant floorspace and the relocation of the substation to ground floor level. In addition, due to the relocation of affordable unit A.1.2 to first floor, this has also incurred an increase in commercial floorspace. The previous areas which were voids at ground floor level have now also been filled in.

6.44 Overall the residential floorspace has increased slightly by 61.4 sq m from 4,672.1 sq m to 4,733.5 sq m within the consented building envelope. This is due to the reduction in the number of units, therefore the reduction in party walls which has had a consequential increase in the GIA. In addition, due to the reduction in the number of units, there has also been reconfiguration of balcony floorspace which has also increased the GIA along with the relocation of the substation.

6.45 The internal reconfiguration brought about by the required restructuring has been carefully designed to create a far more functional building, without detriment to the standard of design and accommodated within the consented building footprint and envelope and do not impact upon the external appearance. Therefore, the proposals are in accordance with Policy D1 'design'.

6.46 The external amendments include:

1. At ground floor, Block C's entrance along Camden Street has been repositioned and

the residents lobby amended. In addition, the staircase has been amended, refuse store repositioned and entrance canopy extended. This is also partly reflected along the canal frontage which abuts Camden Street;

2. At ground floor, Block A along Bonny Street now only includes the entrance lobby for the affordable units and not the wheelchair units;
3. At first floor level, there are proposed amendments to the lightwell to flat A.1.1 and roof light design within the courtyard. In addition, the communal and private terraces have been omitted here (previously located within the courtyard area);
4. At third floor, the PV panels proposed on Block C relocated from fourth storey to the roof above 7th floor of Block C. In addition, the private terrace has been removed for Block D and the communal terrace has been enlarged;
5. At fifth floor, the roof of Block B has been revised to omit the staircase and enlarge the communal terrace. In addition, the lift overrun has been omitted due to the amendments to the cores;
6. At first level up to seventh floor there are also amendments to the balconies and winter gardens, to suit the amending units in terms of location and size. Overall through these are proposed in similar locations or either omitted or larger to meet the requirements of each of the flats. The amenity space is assessed in the following section.

6.47 These internal and external amendments are clearly documented on the enclosed comparison drawings prepared by Chassay + Last.

6.48 Although amendments are proposed to the external elevations of the blocks, these do not materially change the appearance of the consented buildings. The amendments to the elevations are consequential to the reconfiguration of the internal areas to create a far more functional building. It is therefore considered that these minor external amendments to the elevations will overall improve the functionality of the buildings whilst also meeting the requirements of Local Plan Policy D1 'design'.

Amenity of adjacent residents

Planning policy position

6.49 Policy A1 'managing the impact of development' states that the Council will seek to protect the quality of life of occupiers and neighbours. The Council will grant permission for development unless it causes unacceptable harm to amenity and have consideration to the following:

- Visual privacy, outlook;
- Sunlight, daylight and overshadowing;

- Artificial lighting levels;
- Transport impacts;
- Impact of constructions;
- Noise and vibration levels;
- Odour, fumes, dust;
- Microclimate;
- Contaminated land.

6.50 The proposed amendments to the scheme are dealt with in turn below:

- Visual privacy, outlook – there are no proposed amendments to the building’s envelope or window locations and therefore no impact upon outlook or visual privacy from the flats. A number of the balconies have been reconfigured in terms of their location and size, however, they have not been introduced at new locations. Therefore, there will be no detrimental impact on visual privacy of future occupiers or surrounding neighbours. An improvement of the scheme is the omission of one of the lift overruns at Bonny Street due to proposal to combine the core for Blocks A and B;
- Sunlight, daylight and overshadowing – as stated above, the building envelope is remaining as consented and there are no amendments proposed to the window locations, therefore there will be no impact upon sunlight, daylight or overshadowing to that consented;
- Artificial lighting levels – this is not applicable as any further proposals for lighting will be secured by planning condition;
- Transport impacts – the proposals are to remain car free with the exception of the disabled bay located along Bonny Street in accordance with the consented scheme;
- Impact of construction – a detailed construction management plan (CMP) was submitted as part of planning obligation 4.71 of the S106 and discharged on 6th February 2018. This is being abided by through the demolition and construction phases;
- Noise and vibration levels – this is as per the above and there are detailed sections within the CMP which deal with this through demolition and construction;
- Odour, fumes, dust - Noise and vibration levels – this is as per the above and there are detailed sections within the CMP which deal with this through demolition and construction;

6.51 Overall, it is clear that given the amendments have been accommodated within the consented building footprint and envelope and that there will not be any detrimental impact upon future occupiers or neighbour’s amenity in accordance with policy A1 ‘amenity’.

7 CONCLUSION

7.1 This statement and associated plans prepared by Chassay + Last has demonstrated that the proposed amendments to the scheme are in compliance with national, regional and local planning policy. The scheme will deliver numerous planning benefits, many of which are over and above those delivered by the consented scheme and include:

1. The provision of 36 high-quality dwellings;
2. The proposal maintains the residential floorspace and habitable rooms secured by the consented scheme. Therefore the overall population of the proposed development will contribute positively to the Borough's housing supply in accordance with Local Plan Policy H1;
3. Through the reorganisation of the internal areas, a higher proportion of commercial floorspace has been achieved which will increase the employment capacity of the site through the delivery of over 2000sqm of new flexible office space, providing space for up to 167 full-time employees;
4. The percentage of affordable housing floorspace has been maintained at 24% through the amendments to the scheme. Notably larger social rented units are proposed through the amendments including 2 no. 2 beds instead of 2 no.1 bed units – a total of 12 affordable units are proposed;
5. The applicant has responded positively to feedback from the RSL to provide a separate core for Blocks A and B – RP have confirmed that the proposed amended affordable housing layout is more deliverable than the consented scheme;
6. The social rented wheelchair unit has been relocated from the ground to first and now benefits from access to two lifts. The other social rented unit at first floor now benefits from lift access;
7. The proposal will provide a higher proportion of larger units and meet an identified need within the Borough in accordance with Local Plan Policy H6 and H7;
8. Through the reconfiguration of both internal and external terraces, the proposal provides a higher level of communal amenity space which can be enjoyed by future occupiers in accordance with Local Plan Policy A2 - Provision of 343.6sqm of external terrace space, an increase of 172.6sqm;
9. The layouts of the residential units are more efficient, and each unit is dual aspect and provided with large balconies, therefore creating a high-quality residential environment in accordance with Local Plan Policy D1;
10. The proposal contributes to the activation of the canal edge and regeneration of an unsightly existing site;
11. The proposed amendments to the scheme are largely internal and the consequential

amendments to the elevations provide further benefits to the scheme, for example the removal of one of the lift overruns at Bonny Street;

12. The overall appearance of the development will remain as consented and provides a development which is in keeping and enhances the local context;
13. There will be no change to the overall building footprint; and
14. The proposed amendments will not impact upon any adjacent neighbour's amenity in accordance with Local Plan Policy A1.

7.2 The proposal will deliver a significant amount of economic, social and environmental benefits for the site and surrounding area in accordance with the NPPF and Camden's adopted Local Plan.

7.3 It is considered the proposed development is in accordance with the relevant national, strategic and local planning policy and guidance. We therefore respectfully request that the Council grants planning permission for the amendments to the scheme.

