



# PLANNING STATEMENT

KILN PLACE

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23 AUGUST 2019

QUOD

17 Broadwick Street | London W1F 0DE

# Contents

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1	Introduction	3
2	Planning History	4
3	Description of design amendments	5
4	Proposed condition wording	13
5	Summary	14

# 1 Introduction

We are instructed by our client, the London Borough of Camden to submit an application under Section 73 of the Town and Country Planning Act 1990 (as amended) ('TCPA') to vary condition 2 and to add a new condition to planning permission ref: 2014/6697/P (as amended by 2016/2651/P and 2017/4471/P) (the 'Planning Permission').

1.1 This application relates to the following area (the 'Site'):

*"Land at Kiln Place, Gospel Oak comprising foyer entrances and refuse store areas at blocks 1-64, 65-80, 81-96, 97-104, 105-116, 117-164 Kiln Place, entrance ways into 81-96 Kiln Place, land between 81-96 and 117-164 Kiln Place, land between Kiln Place and Meru Close, land to the east of Kiln Place and playground between blocks 65-80 and 81-96 Kiln Place".*

1.2 Planning permission (ref: 2014/6697/P) was originally approved by London Borough of Camden on 31 March 2015 for the following works at the Site:

*"Development of 15 residential units on 6 sites across Kiln Place estate, following demolition of foyer entrances and refuse storage area for blocks 1-64, 65-80, 81-96, 97-104, 105-116, 117-164 Kiln Place along with provision of new pathway and front entrances into lower maisonettes of 81-96 Kiln Place, enlargement and improvement of playground & landscaping, and other associated works".*

1.3 The original planning permission (ref: 2014/6697/P) was subsequently subject to two applications for minor material amendments under s.73 of the TCPA, as detailed in section 2.

1.4 We have now been instructed by the London Borough of Camden to submit a further minor material amendment application under s.73 of the TCPA which seeks to vary condition 2 and to add a new condition, thus securing further minor amendments to the proposed design and the monitoring of the revised waste strategy respectively, as detailed in section 3.

1.5 The design amendments proposed represent a direct response to ongoing engagement with the Kiln Place Tenants and Residents Association (TRA) and London Borough of Camden's Estate Services Team, in addition to encapsulating amendments borne out of further detailed design work.

## 2 Planning history

### Original planning permission

- 2.1 Full planning permission (ref: 2014/6697/P) was originally approved by London Borough of Camden on 31 March 2015 for:

*“Development of 15 residential units on 6 sites across Kiln Place estate, following demolition of foyer entrances and refuse storage area for blocks 1-64, 65-80, 81-96, 97-104, 105-116, 117-164 Kiln Place along with provision of new pathway and front entrances into lower maisonettes of 81-96 Kiln Place, enlargement and improvement of playground & landscaping, and other associated works”.*

### First minor material amendments

- 2.2 The original planning permission (ref: 2014/6697/P) was altered by a minor material amendment application (ref: 2016/2651/P) under s.73 of TCPA to vary the wording of conditions 3, 5, 6, 8, 9, 12, 13, 17, 18 and 23-26. These minor variations were proposed to allow preparatory works to begin on site prior to the approval of some details previously reserved by conditions. The application (ref: 2016/2651/P) was approved on 10 March 2017.

### Second minor material amendments

- 2.3 Subsequently, a further minor material amendment application (ref: 2016/2651/P) was submitted under s.73 of the TCPA which sought changes to the approved design. This was approved on 04 June 2018, allowing the following design changes:

#### General Works

- The omission of the archway previously proposed between Unit 2.2 and Unit 3.1.
- The introduction of new sections of front entrance wall close to 117 and 118 Kiln Place to align with wider proposals adjacent to the Site for new front entrances at 117-122 Kiln Place (subject to a separate full planning application (ref: 2017/4472/P)).

#### Site 2

- The reconfiguration of the internal layout of Unit 2.1 (market sale), changing the 88sqm dwelling from a 2-bed 3-person to a 2-bed 4-person unit.

#### Site 3

- The removal of the archway between Sites 2 and 3 to increase the openness and overlooking of public space at Kiln Place, particularly to the new square created between Sites 2 and 3.
- The reconfiguration of the internal layout of Unit 3.1 (social rent) and its increase in size by 10sqm, changing the dwelling from a 1-bed 2-person to a 2-bed 3-person unit. The refuse store for this unit was also relocated and reconfigured to have a more efficient linear layout.
- The reconfiguration of the internal layout of Unit 3.2 to introduce a lobby area between WC and living space.
- The lowering of roof line/levels to better align with the existing fenestration.

#### Site 4

- The reconfiguration of the refuse store layout to have a more linear formation.
- The lowering of roof line/levels to better align with the existing fenestration.

## 3 Description of design amendments

### Introduction

3.1 This application seeks to further vary the approved documents listed under condition 2 of the Planning Permission to secure a series of design amendments relating to:

- Refuse stores.
- Wheelchair units and parking.
- Communal cycle storage.
- External amenity areas.
- Front gardens at Block 81-96.
- Road reconfiguration and bollard changes.
- Tree planting locations, quantities and species.
- Landscaping and green roofs.

3.2 This application also seeks to introduce a new condition to the Planning Permission to facilitate and secure the ongoing development of the refuse strategy in discussion with the Environmental Services and Estate Services teams at LBC. The purpose and justification for this new condition is described further in this section and its proposed wording is set out in section 4.

3.3 Paragraph 018 (Reference ID: 17a-018-20140306) of the Planning Practice Guidance states that:

*“There is no statutory definition of a ‘minor material amendment’ but it is likely to include any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved”.*

*(Revision date: 06.03.2014)*

3.4 As explained in further detail below, the proposed amendments will not result in a substantially different development from the one which has been approved, reference 2014/6697/P (as amended by 2016/2651/P and 2017/4471/P).

### Refuse strategy

#### *Nature of amendment*

3.5 The Phase II Waste Assessment: Waste Strategy (October 2014) (‘Phase II Waste Strategy’) produced by Ramboll and submitted in support of the original planning application (ref: 2014/6697/P) assumed that all new dwellings proposed would individually store their refuse and recycling in their private front gardens or courtyards, with the exception of units 3.1, 3.2, 5.1, 5.2 and 5.3.

3.6 Following engagement with the Estate Services Team at LBC and the Kiln Place TRA, it is now proposed to make amendments to the proposed refuse stores and associated waste strategy.

3.7 It is proposed to install a new MetroSTOR with capacity for 6 Eurobins on the corner of Lamble Street and Kiln Place and to use Existing Store 3 for the storage of recyclable waste, as shown on Proposed Partial Ground Floor GA Plan (Sites 1, 2, 3 & 6) (drawing reference: 116\_L\_001 Rev. T). This MetroSTOR will contain 4 x 1100L general waste and 1 x 240L food waste. Existing Store 3 will contain 3 x 1280L recycling bins. There will serve Units 1.1-1.4 and 117-164 Kiln Place.

- 3.8 Units 1.5, 1.6, 2.1, 2.2 and 6 will continue to be served by individual refuse and recycling stores in their private front gardens or courtyards. However, this will be considered further when the refuse strategy is reviewed, as secured through a new planning condition set out in section 4 of this statement.
- 3.9 Elements of this revised strategy require the provision of some refuse stores beyond the application site boundary. Accordingly, the following works are the subject of a full planning application to be submitted shortly to LBC. It is intended that this impending full application be determined in tandem with this minor material amendment application:
- a. Part of the new MetroSTOR proposed to be installed on the corner of Lamble Street and Kiln Place falls outside of the red line boundary for the extant permission. Accordingly, this MetroSTOR will be also covered by the impending full planning application.
  - b. A linear external bin enclosure is proposed at Site 4, as shown on Proposed Partial Ground Floor GA Plan (Sites 4 & 5) (drawing reference: 116\_L\_002 Rev. P). This is intended to serve 1-64 Kiln Place and Unit 4, containing 3 x 1100L general waste and 2 x 1280L.
  - c. New MetroSTOR enclosures are to be installed close to the junction between Kiln Place and Grafton Road, as shown on Proposed Partial Ground Floor GA Plan (Sites 4 & 5) (drawing reference: 116\_L\_002 Rev. P). These will service 97-116 Kiln Place and will contain 4 x 110L general waste bins, 1 x 1280L recycling bins, and 3 x Eurobins (surplus).
  - d. 65-96 Kiln Place will be served by linear MetroSTOR enclosures located adjacent to the playground, as shown on Proposed Partial Ground Floor GA Plan (Sites 4 & 5) (drawing reference: 116\_L\_002 Rev. P). These additional MetroSTOR serves 65-96 Kiln Place and contain 3 x 1100L general waste, 2 x 1280L recycling bins and 1 x Eurobin (surplus). Additionally, bulk waste enclosures have been installed, as requested by LBC's Estate Services Team.
- 3.10 The revised refuse locations and wider waste strategy is further detailed in the accompanying Waste Strategy Addendum (August 2019), submitted in support of this application.
- 3.11 In pre-application discussions with Linda Hall-Brunton at LCB (Principle Environmental Services officer) it has been agreed that the Waste Strategy Addendum (August 2019) should be reviewed over the coming months to investigate the performance of the strategy and to assess whether further changes are needed.
- 3.12 It is proposed that this review and the subsequent approval of any additional details relating to the waste strategy should be secured by way of a new planning condition. Whilst the final wording of such a condition will need to be agreed with LBC through the determination of this application, indicative wording is provided in section 4 of this statement.

### *Justification*

- 3.13 Following the approval of the Planning Permission, further engagement with LBC's Estates Team, Environmental Services team, and the Kiln Place TRA has revealed that amendments to the waste strategy are required. Additionally, the Estate Services Team have advised that, following changes to their Estate Management Strategy, MetroSTOR refuse stores should be installed wherever possible.
- 3.14 The principle requirement for additional refuse stores is driven by the objective to service more of the properties by way of communal rather than individual stores. This approach has been informed through discussions with Linda Hall-Brunton at LBC (Principle Environmental Services officer). She stated that refuse bins would be too close to existing properties on Kiln Place and therefore needed to be enclosed. She has

also requested that all the refuse bins adjacent to the playground be altered so that they are enclosed. These proposed amendments are addressed as part of the revised refuse strategy.

- 3.15 The Environmental Team at LBC have also recommended a number of changes be made to the new waste locations at both Kiln Place and Grafton Road. However, this has necessitated works beyond the red line boundary of the original application and therefore a further full planning application which will be submitted to LBC shortly.
- 3.16 The completed shared surface on Kiln Place has led to complaints from the Estate Services team and Kiln Place TRA that individual bin collections, particularly to Sites 1 and 2, will lead to a nuisance. This is because the shared surface in those locations is a busy thoroughfare, not just for Kiln Place, but for residents at Meru Close. If the bins are left outside the properties on the shared surface this could give rise to obstacles. Accordingly, Units 1.1-1.4 are now proposed to be serviced by communal refuse stores comprising a new linear MetroSTOR (domestic and food waste) and Existing Store 3 (recycling) located close to the 117-164 Kiln Place block.
- 3.17 The TRA have requested that domestic waste not be stored under flats at 117-164 Kiln Place as this could lead to odour issues for dwellings above, adversely affecting the residential amenities of these properties. Accordingly, only recyclable waste is to be stored beneath these properties within Existing Store 3.
- 3.18 The new linear MetroSTOR refuse stores installed close to the playground were required as the refuse store previously proposed adjacent to 65-96 Kiln Place proved not to be suitable following the discovery of a UKPN cable located circa 100mm beneath the paving slab.
- 3.19 The configuration of proposed bin stores to a linear arrangement represents a more efficient layout, allowing more storage per square metre, and also serves to reduce impacts on vehicle movements.
- 3.20 The new MetroSTORs to be installed close to the junction with Kiln Place and Grafton Street are required to replace the capacity lost through the demolition of an existing store which serviced 97-116 Kiln Place.
- 3.21 The amendments proposed will ensure that the estate includes appropriate facilities for the storage and collection of waste and recycling, meeting the needs of local residents and Estate Services, consistent with part (d) of Policy CC5(d) (Waste) in the Camden Local Plan (2017).

## Wheelchair units and parking

### *Nature of amendment*

- 3.22 The Planning Permission includes two wheelchair units as part of the proposals (Units 5.1 and 5.3). The London Borough of Camden now propose that Unit 6 (1 Bed-2 Person) becomes a wheelchair unit, with Unit 5.1 (previous 1 Bed-2 Person) returning to a 'general needs' social rented unit. This approach ensures there is no net change in the number or type of wheelchair dwellings proposed.
- 3.23 At Site 6, the only physical changes are very minor adjustments to the interior layout of Unit 6 and the dedication of one of the existing garage spaces to Unit 6. This is necessary to ensure that there is a wheelchair parking space within proximity to this dwelling adjacent to Kiln Place. These changes are shown on the Proposed Partial Ground Floor GA Plan (Sites 1, 2, 3 & 6) (drawing reference: 116\_L\_001 Rev. T) submitted in support of this application.
- 3.24 At Site 5, the parking bay arrangements are to be altered so that the wheelchair accessible bay will be provided closer to Unit 5.3. This amended parking layout allows a further standard parking bay to be provided at Site 5 to bring the total number of car parking spaces in this location to four (including the

wheelchair bay). These changes are shown on the Proposed Partial Ground Floor GA Plan (Sites 4 & 5) (drawing reference: 116\_L\_002 Rev. P).

#### *Justification*

- 3.25 Delivering Unit 6 as a wheelchair unit instead of Unit 5.1 is preferable because the London Borough of Camden consider Unit 6 offers a more favourable space for a wheelchair user.
- 3.26 It is necessary to utilise one of the existing garage spaces to provide a disabled space to ensure there is appropriate parking in proximity to the proposed wheelchair unit at Site 6. The changes to the parking at Site 5 are necessary to ensure that the disabled parking space is located closer to the wheelchair unit (Unit 5.3), thus ensuring it is suitable accessible.
- 3.27 London Borough of Camden's Housing & Health Occupational Therapist - Neil Steadman was consulted on these proposals. He provided his support for the approach to accessibility in March 2019. In addition, Albert Grant within LBC's Building Control team provided approval with respect to Approved Document Part B in January 2019.
- 3.28 The proposed amendments would serve to ensure that the new wheelchair unit at Site 6 benefits from a disabled parking space within its proximity, thus according with part (e) of Policy C6 (Access for all) in the Camden Local Plan (2017) which sets out the Council's commitment to securing car parking for disabled people.
- 3.29 The proposed amendment would result in a single additional parking space when compared with the original permission. However, the redevelopment of the Kiln Place estate will still result in an overall net reduction of 10 parking spaces and therefore remains consistent with the principle objective of Policy T2 (Parking and car-free development) in the Camden Local Plan (2017).

### **Communal cycle storage**

#### *Nature of amendment*

- 3.30 Seven Sheffield stands were to be installed within the easternmost of the existing garages located adjacent to the 117-164 Kiln Place Block. However, since Unit 6 (1 Bed-2 Person) is to become a wheelchair unit, this garage is now required to provide a wheelchair accessible car parking space.
- 3.31 To facilitate this, the cycle parking previously proposed to be located within this garage is now to be accommodated within a purpose-built Anti-Vandal Wardale Cycle Shelter. This new cycle shelter will be installed circa 20m to the north of the existing garages, close to the corner of Lambale Street and Kiln Place, as shown on the Proposed Partial Ground Floor GA Plan (Site 1, 2, 3 & 6) (drawing reference: 116\_L\_001 Rev. T). This shelter will provide secure and covered parking for 13 bicycles, accessed by a sliding door secured via keypad.

#### *Justification*

- 3.32 The Design and Access Statement (October 2014) submitted in support of the original planning permission (ref: 2014/6697/P) explains the requirement for 13 communal cycle parking spaces to be provided. It was originally envisaged that this would be achieved by 7 Sheffield stands within one of the existing garages.
- 3.33 Given that the existing garage to the east of the 117-164 Kiln Place block is now to be used to provide a disabled parking space for Unit 6, these 13 communal cycle spaces will need to be provided in an alternative location. It is therefore proposed to install a purpose-built Anti-Vandal Wardale Cycle Shelter to provide the required secure and covered communal cycle parking. This would provide accessible, secure cycle parking



facilities, as envisaged by Policy T1 (Prioritising walking, cycling and public transport) in the Camden Local Plan (2017). This approach would also continue to achieve the 22 cycle parking spaces required by Condition 9 attached to the extant planning permission (ref: 2017/4471/P).

- 3.34 The approach to the relocated cycle parking has been discussed with David Peres De Costa (Senior Planning Officer, LBC) and Steve Cardno (Public Realm & Planning Team Manager, LBC). A site visit with these officers was conducted on 13 August 2019 to discuss the proposals. A revised layout was proposed at this site visit, with the MetroSTOR and cycle storage sited adjacent to one another on the corner of Lamble Street and Kiln Place. However, further discussions are required regarding the specification of the cycle storage. The applicant is therefore keen to maintain dialogue with officers during the determination period to reach consensus on this matter.
- 3.35 Details were submitted on 04 July 2017 to the London Borough of Camden to support an application to discharge condition 9 (Cycle storage) attached to the Planning Permission (ref: 2017/3806/P). However, this condition is still pending discharge and, in light of the changes now sought, revised information will need to be provided in due course to allow the discharge of this condition.

## External amenity areas

### *Nature of amendment*

- 3.36 At Site 1, a Meta handrail balustrade is now proposed in the front courtyard of Unit 1.1 in place of the brick wall previously shown.
- 3.37 At Site 3, further detailed design work has allowed the steps into the courtyard of Unit 3.1 to be omitted. A level access from the paved area into the courtyard is instead proposed.
- 3.38 At Site 5, changes are proposed to the height and layout of the wall to enclose the courtyard of Unit 5.1. The new brick boundary wall will benefit from metal railings along its top and a 1800mm tall metal gate, in place of the low-level timber gate previously proposed.
- 3.39 At Unit 6, it is proposed to omit the gate to the front courtyard, as shown on Existing & Proposed Elevation 15 (drawing reference: 116\_E\_15 Rev. E). It is also proposed to slightly alter the profile of the boundary wall for the courtyard of Unit 6, as shown on Existing & Proposed Elevation 08 (drawing reference: 116\_E\_08 Rev. F).

### *Justification*

- 3.40 The design amendments proposed to the external amenity space at Sites 1 and 3 will serve to improve accessibility of these spaces from the dwellings they serve. The amendments to the courtyard of Unit 5.1 will ensure that this space is suitably secure. The main entrance to Unit 6 is from Kiln Place and further design work has shown the gate to the front courtyard previously proposed to be superfluous.

## Front gardens at 81-96 Kiln Place

### *Nature of amendment*

- 3.41 The previous Minor Material Amendment application approved in June 2018 introduced the provision of new private front gardens servicing the dwellings within the 81-96 Kiln Place block. It is now proposed to omit these front gardens and entrances from the latest iteration of the proposals. Instead, it is proposed to remove the existing timber louvres and install a new tree lined path along the northern elevation of the 81-96 Block. This is shown on Proposed Partial Ground Floor GA Plan (Sites 1, 2, 3 & 6) (drawing reference: 116\_L\_001 Rev. T).

### Justification

- 3.42 This amendment is a direct response to continued engagement with local residents. The Kiln Place TRA raised concerns with the extent of the green space being lost due to the overall width of the new pathway and gardens in front of the 81-96 Kiln Place block. Accordingly, it is now proposed to omit the front gardens and therefore enable the overall width of the path to be reduced from 5m to 3.4m, reducing the area of greenspace and impermeable surfacing required to deliver the proposals. This approach is consistent with part (c) of Policy A3 (Biodiversity) in the Camden Local Plan (2017) which seeks to protect features with nature conservation value, including gardens. The reduction in width will also allow the planting of new trees along this section of the path which is supported by part (m) of Policy A3.

## Road reconfiguration and bollard changes

### Nature of amendment

- 3.43 It is proposed to reconfigure and resurface the section of the Kiln Place road between Site 1 and 2, as shown on Proposed Partial Ground Floor GA Plan (Sites 1, 2, 3 & 6) (drawing reference: 116\_L\_001 Rev. T). These works would comprise:
- The omission of the trees previously proposed along Kiln Place, with the exception of the single tree on the corner of Lambie Street and Kiln Place;
  - The increased width of the section of pavement to 1.8m, where it passes in front of the existing garages adjoining the eastern end of 117-164 Kiln Place block; and
  - The realignment of the cobbled stone gully in line with the reconfigured road.
- 3.44 New bollards are also proposed to be installed on the western edge of Kiln Place between Sites 1 and 2 to demarcate the footpath within the wider shared surface, as shown on Proposed Partial Ground Floor GA Plan (Sites 1, 2, 3 & 6) (drawing reference: 116\_L\_001 Rev T). The bollards will have a 200mm diameter at the base. Two of the proposed bollards close to the Unit 6 garage can be folded down to enable vehicular access.
- 3.45 Additionally, new bollards are also to be installed at Site 4 along the outer edge of the sections of pavement bordering Unit 4, as shown on Proposed Partial Ground Floor GA Plan (Sites 4 & 5) (drawing reference: 116\_L\_002 Rev. P). These will be constructed from concrete and set at approximately 2m intervals.

### Justification

- 3.46 The other works proposed to these sections of Kiln Place are direct responses to ongoing engagement with the TRA and should allow these spaces to be used by vehicles and pedestrians with increased confidence. This is consistent with part (g) in Policy 1 (Design) in the Camden Local Plan (2017) which outlines the Council's objective for developments to be inclusive and accessible for all.
- 3.47 Section 4.0 in the Proposed Tree Planting Location Assessment produced by Tree Aware UK Ltd concludes that *"The approved current tree planting locations can be described as being unsuitable for trees to be planted and if undertaken will likely result in the loss and or the none establishment of any newly planted trees, unless suitable planting conditions are created"*. Accordingly, the trees along this section of road have been omitted and the new trees are now proposed in more favourable locations, as shown on the Kiln Place Indicative Landscape Plan (drawing reference: on 116\_P\_02P Rev. C).

## Tree planting locations, quantities and species

### Nature of amendment

- 3.48 It is intended that 18 new trees will be planted as part of the Kiln Place Estate development. This is an increase of four new trees over the 14 previously proposed through the Planning Permission. These trees

will be planted in different locations to that previously suggested, as recommended in the Tree Aware UK report submitted in support of this application. These are intended to be high quality semi mature trees located in pits and are envisaged to comprise the following species or similar:

- 'Rancho' Flowering Cherry.
- Pyrus Calleryana ('Chanticleer' Ornamental Pear).
- Acer Campestre ('Elsrijk' Field Maple).

3.49 The revised intended locations for the planting of new trees is shown on the Proposed Indicative Landscaping Plan (drawing reference: 116\_P\_02P Rev. C).

#### *Justification*

3.50 Tree Aware UK were instructed by the London Borough of Camden to review the previously proposed tree planting locations and assess their suitability. Accordingly, Alastair Gavin of Tree Aware UK visited the Site with the Kiln Place TRA on 17 February 2019 and subsequently produced the Proposed Tree Planting Location Assessment (July 2019) which is submitted in support of this application. This report confirms that the intended locations for the new trees would not be appropriate as they would be:

- Adjacent to the new areas of construction and within non permeable hard standing.
- Confined and in areas which do not benefit from any existing trees *in situ*.
- In areas where the soil structure is likely to be compacted with little topsoil accessible to the new trees.
- In areas likely to be lacking in natural rainwater available for the newly planted trees, due to the extent of hard standing.
- Within the street scene where they will be at risk of impacts from vehicles and vandalism.

3.51 Tree Aware UK's report concludes that the previously proposed planting locations are unsuitable and suggests alternative planting locations to create suitable conditions for the new trees proposed. This will ensure that the proposals will deliver new trees which have the best opportunity to establish and prosper. This is consistent with part (m) of Policy A3 (Biodiversity) which sets out the Council's expectation that developments should incorporate additional trees and vegetation, wherever possible.

3.52 The proposed changes to tree planting were discussed at a site visit with Nick Bell (Tree officer, LBC) on 10 May 2019 and subsequently agreed in principle with the wider Green Space Team at LBC.

3.53 Details were submitted to support the discharge of condition 13 (Landscaping) attached to the Planning Permission on 04 July 2017 (ref: 2017/3806/P). However, this condition is still pending discharge and, in light of the changes now sought, revised information will need to be provided in due course to discharge this condition.

## **Green and brown roofs**

### *Nature of amendment*

3.54 It is proposed to omit the brown and green roofs previously proposed as these are no longer required to contribute towards the drainage strategy for the proposals. This change is shown on the Proposed Site Plan (drawing reference: 116\_P\_01P Rev. N).

### *Justification*

3.55 The detailed design work undertaken by the design and build contractor resulted in the formulation of a Sustainable Urban Drainage System (SuDS) which makes effective use of ground cellular attenuation to

reduce runoff rate. The details of this drainage were submitted to London Borough of Camden to support an application (ref: 2017/3804/P) to discharge condition 12 which was granted on 27 February 2018.

- 3.56 The approved drainage strategy provides 1,856 m<sup>3</sup> of attenuation as opposed to the 1,200 m<sup>3</sup> set out in Ramboll's Flood Risk Assessment (September 2014) submitted in support of the original planning application (ref: 2014/6697/P).
- 3.57 Green and brown roofs were only ever included in the scheme to assist with the drainage of the Site and were not required to deliver any other mitigation role. The green roofs would not have been visible from the public realm nor would they have been accessible to residents. The efficiency and ground cellular attenuation drainage strategy, as approved by the discharge of condition 12, has therefore negated the purpose of the green and brown roofs.

## 4 Proposed condition wording

- 4.1 This application under s. 73 of the Town and Country Planning Act 1990 (as amended) proposes that condition 2 be varied to refer to the latest revisions of planning drawings which reflect the design changes described in section 3. The purpose being to allow LBC to obtain permission for the minor material design changes proposed. Appendix A of this statement contains a schedule which shows the drawings approved by condition 2 of planning permission ref: 2014/6697/P (as amended by 2016/2651/P and 2017/4471/P) annotated to show which plans are to be superseded by the revised drawings.

### Condition 2 amendments

- 4.2 The proposed amendments sought to condition 2 are as follows (amendments shown in red):

*“The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Plan; Planning Statement by Quod Planning dated October 2014 (As amended by letter from Quod dated August 2016); 116\_S\_01 Rev D; 02 Rev B; 06 Rev A; ~~116\_E\_01 Rev E~~ **116 E 01 Rev G**; ~~02 Rev B~~ **02 Rev D**; 03 Rev C; 04 Rev B; 14 Rev A and ~~15 Rev B~~ **15 Rev C**; 23318\_01 Rev 2; Additional elevations and images; Tree survey overlay drawing; Arboricultural Method Statement by Tree Aware Ltd dated 26/9/2014; Arboricultural Impact assessment by Tree Aware Ltd dated 26/9/2014; Tree Survey by Tree Aware Ltd dated 23/01/2014; Habitat Survey by Ramboll dated October 2014; Design and Access Statement by Peter Barber Architects dated October 2014; Flood Risk Assessment by Ramboll dated October 2014; Daylight/Sunlight report dated 16/9/2014; Energy Strategy and CFSH Report by Ramboll dated 30/09/2014; Transport Statement by Ramboll dated September 2014; Construction Management Plan by JMP dated 16/7/2014; Geotechnical and Environmental desk study by Ramboll dated October 2014; Noise and vibration impact assessment by Ramboll dated October 2014 and Waste Assessment by Ramboll dated 20/10/2014; ~~116\_P\_01P Rev J~~ **116 P 01P Rev M**; ~~116\_L\_001 Rev M~~ **116 L 001 Rev Q**; ~~116\_L\_101 Rev K~~ **116 L 101 Rev M**; ~~116\_L\_201 Rev K~~ **116 L 201 Rev M**; ~~116\_L\_002 Rev G~~ **116 L 002 Rev M**; ~~116\_L\_102 Rev F~~ **116 L 102 Rev H**; ~~116\_L\_202 Rev G~~ **116 L 202 Rev J**; ~~116\_E\_05 Rev D~~ **116 E 05 Rev F**; 116\_E\_06 Rev C; 116\_E\_07 Rev C; ~~116\_E\_08 Rev D~~ **116 E 08 Rev F**; ~~116\_E\_09 Rev C~~ **116 E 09 Rev E**; 116\_E\_10 Rev B; 116\_E\_11 Rev C; ~~116\_E\_12 Rev E~~ **116 E 12 Rev H**; ~~116\_E\_13 Rev D~~ **116 E 13 Rev F**; 116\_S\_03 Rev D; 116\_S\_04 Rev B; 116\_S\_05 Rev C”.*

### New refuse condition

- 4.3 It is also proposed to add a new condition to secure a future review of the refuse strategy. The proposed wording for this condition is provided below:

*“Within six months following the date that the first of the new residential units permitted by this planning permission is occupied, an updated Waste Strategy Addendum should be submitted to and approved in writing by the Local Planning Authority. This updated Waste Strategy Addendum should be produced in collaboration with the Environmental Services Team at London Borough of Camden and consider whether it is feasible to service additional residential units on the Kiln Place estate by way of communal bin stores”.*

- 4.4 This wording is only indicative, and it is expected that the final wording of such a condition would be produced through negotiation with planning officers at LBC during the determination period for this application.
- 4.5 This application has been submitted in tandem with a full planning application for the new refuse stores which fall beyond the original application site. Accordingly, the same condition should be attached to both the amended planning permission and the new full planning permission sought.

## 5 Summary

- 5.1 Accordingly, we have been instructed by the London Borough of Camden to submit this minor material amendment application under s.73 of the TCPA. This seeks to vary the wording of condition 2 and to add a new condition (as summarised in section 4) thus securing further minor amendments to the proposed design and the monitoring of the revised waste strategy, as detailed in section 3.
- 5.2 Importantly, none of the changes proposed, either in isolation or cumulatively, would result in a substantially different development to that which has already been approved.
- 5.3 The design amendments proposed represent a direct response to ongoing engagement with the Kiln Place TRA and the London Borough of Camden's Estate Services Team, in addition to encapsulating changes necessitated by further detailed design work. Fundamentally, the proposed changes will serve to deliver a high-quality design which will improve the Kiln Place estate for current and future residents.

## Appendix A

### Drawing Schedule for planning permission ref: 2017/4471/P (updated to show superseded drawings)

 = Drawings unchanged by amendments

 = Drawings which have been revised

Drawing title	Approved drawing reference	Revised Drawing Number
Site Location Plan	116_P_00X Rev A	N/A – no change
Existing Site Plan; inc. Roof Plan	116_P_01X Rev C	N/A – no change
Existing Site Demolition Plan	116_P_00D Rev X	N/A – no change
Proposed Site Plan; inc. Roof Plan	116_P_01P Rev J	116_P_01P Rev N
Proposed Indicative Landscape Plan	116_P_02P Rev X	N/A – no change
Proposed Ground Floor GA Plan (Sites 1, 2,3 & 6)	116_L_001 Rev M	116_L_001 Rev T
Proposed First Floor GA Plan (Sites 1, 2,3 & 6)	116_L_101 Rev K	116_L_101 Rev M
Proposed Second Floor GA Plan (Sites 1, 2,3 & 6) + Third Floor GA Plan (Site 1 & 3)	116_L_201 Rev K	116_L_201 Rev M
Proposed Ground Floor GA Plan (Sites 4 & 5)	116_L_002 Rev G	116_L_002 Rev P
Proposed First Floor GA Plan (Sites 4 & 5)	116_L_102 Rev F	116_L_102 Rev H
Proposed Second Floor GA Plan (Sites 4 & 5)	116_L_202 Rev G	116_L_202 Rev J
Elevation 01 - Site 1: Existing & Proposed South-West Elevation (Kiln Place Elevation)	116_E_01 Rev E	116_E_01 Rev G
Elevation 02 - Site 1: Existing & Proposed North-West Elevation (Lamble Street Elevation)	116_E_02 Rev B	116_E_02 Rev E
Elevation 03 - Site 1: Existing & Proposed North-East Elevation (from Hemingway Close)	116_E_03 Rev C	N/A – no change
Elevation 04 - Site 1: Existing & Proposed South-East Elevation	116_E_04 Rev B	N/A – no change
Elevation 05 - Sites 2 & 3: Existing & Proposed North-East Elevation (Kiln Place Elevation)	116_E_05 Rev D	116_E_05 Rev G

Drawing title	Approved drawing reference	Revised Drawing Number
Elevation 06 - Site 2: Existing & Proposed South-East Elevation	116_E_06 Rev C	N/A – no change
Elevation 07 - Site 2: Existing & Proposed South-West Elevation (Garden Elevation)	116_E_07 Rev C	N/A – no change
Elevation 08 - Site 2: Existing & Proposed North-West Elevation	116_E_08 Rev D	116_E_08 Rev F
Elevation 09 - Site 3: Existing & Proposed North-West Elevation	116_E_09 Rev C	116_E_09 Rev E
Elevation 10 - Site 4: Existing & Proposed North-East Elevation (Kiln Place Elevation)	116_E_10 Rev B	N/A – no change
Elevation 11 - Site 4: Existing & Proposed North-West Elevation (Kiln Place Elevation)	116_E_11 Rev C	N/A – no change
Elevation 12 - Site 5: Existing & Proposed South-West Elevation (Kiln Place Elevation)	116_E_12 Rev E	116_E_12 Rev H
Elevation 13 - Site 5: Existing & Proposed South-East Elevation (Kiln Place Elevation)	116_E_13 Rev D	116_E_13 Rev F
Elevation 14 - Site 5: Existing & Proposed North-East Elevation	116_E_14 Rev A	N/A – no change
Elevation 15 - Site 6: Existing & Proposed South-East Elevation	116_E_15 Rev B	116_E_15 Rev E
Section A-A - Sites 1 & 2 - Cross Section	116_S_01 Rev D	N/A – no change
Section B-B - Site 1 - Long Section	116_S_02 Rev B	N/A – no change
Section C-C - Sites 2 & 3 - Long Section	116_S_03 Rev D	N/A – no change
Section D-D - Site 4 - Cross Section	116_S_04 Rev B	N/A – no change
Sections E-E & F-F - Site 5 - Cross Sections	116_S_05 Rev C	N/A – no change
Sections G-G, H-H & I-I - Site 6 - Long Section & Cross Sections	116_S_06 Rev A	N/A – no change
Design & Access Statement	N/A	N/A – no change