



## **AGAR GROVE ESTATE – BLOCK B**

**APPLICATION FOR MINOR MATERIAL AMENDMENT TO  
PLANNING PERMISSION REF: 2019/4280/P  
Planning and Affordable Housing Statement**

**May 2022**

## Executive Summary

The Agar Grove Estate Regeneration project for part of Camden's 'Community Investment Programme' (CIP), which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP is a 15-year plan and forms a central part of the Council's strategy which seeks to ensure investment in schools, homes and community infrastructure despite reductions in central government funding.

Comprising some 249 units the Agar Grove Estate was built by the London Borough of Camden in the 1960s and comprised a series of low / medium rise blocks and an 18-storey tower.

The Agar Grove estate community is stable and cohesive, and many households have lived there for a number of years. However, despite being a popular place to live, the original stock suffered from a number of problems ranging from physical defects to the size, type and quality of the accommodation relative to housing needs. Furthermore, the original configuration of the Estate represented an inefficient use of land given its accessible and sustainable location.

Full Planning Permission was granted by the local planning authority in August 2014 for the comprehensive redevelopment of the site to create a new mixed-tenure development comprising 493 new homes, retail, business and community space, set within a series of high-quality new buildings and landscape. An amended consent was issued in October 2019 to facilitate a number of minor changes to Block I and JKL to increase the overall number of units by 14 along with changes to the mix of units types, internal layout and massing.

To date, Blocks A, F, G and H have been completed delivering 95 new homes, whilst construction works on Blocks I and JKL is due to complete in January 2024 delivering a further 125 new dwellings.

This application is submitted to seek a minor material amendment to the approved scheme in relation to Block B in response to the housing needs of the Agar Grove estate residents, recent and emerging changes in building regulations and to take into account lessons learnt from the completed phases particularly in relation to achieving Passivhaus.

The proposed changes have been developed in the context of the key principles established by the original consent and are considered to improve the development from a housing and design perspective. The changes are considered to represent a minor material amendment to the approved scheme and so this application is submitted pursuant to s.73 of the Town and Country Planning Act 1990 (as amended) to allow a variation to conditions attached to the original consent relating to approved drawings.

In summary, the changes comprise:

- Addition of a second stair core and evacuation lifts to both buildings within Block B in response to changing approaches to fire safety
- An amended mix of unit types to reflect the needs of the community, including an increase in family sized and accessible units
- An overall reduction in unit numbers within Block B from 105 to 94
- Provision of additional cycle storage to meet current planning standards
- An up-dated energy strategy in response to reflect current planning standards
- Changes to the elevations to reflect the new internal layout and requirements of the up-dated energy strategy

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## 1.0 INTRODUCTION

- 1.1 This Statement has been prepared by CMA Planning Ltd ("CMA") in support of the London Borough of Camden's ("the Applicant") planning application relating to the regeneration of the Agar Grove Estate ("the Site").
- 1.2 The Agar Grove Estate was built by the London Borough of Camden in the 1960s and comprised 249 units within a series of low / medium rise blocks and an 18-storey tower.
- 1.3 The Agar Grove Estate Regeneration project forms part of Camden's 'Community Investment Programme' (CIP), which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP is a 15-year plan and forms a central part of the Council's strategy which seeks to ensure investment in schools, homes and community infrastructure despite reductions in central government funding.
- 1.4 Planning Permission was granted by the local planning authority in August 2014 for the comprehensive redevelopment of the site to create a new mixed-tenure development comprising 493 new homes, retail, business and community space, set within a series of high-quality new buildings and landscape ("the Originally Approved Scheme") (ref: 2013/8088/P).
- 1.5 A revised planning permission was issued in October 2020 as a minor material amendment to the Originally Approved Scheme in relation to Blocks I and JKL comprising: adjustments to the footprint, height, massing and external appearance; revised flat layouts and balcony design; changes to unit type and mix; and 14 additional residential units ("the Amended Consent") (ref: 2019/4280/P).
- 1.6 To date, Blocks A, F, G and H have been completed delivering 95 new homes, whilst construction works on Blocks I and JKL is due to complete in January 2024 delivering a further 125 new dwellings.
- 1.7 This application seeks permission to amend the planning permission in relation to Block B – which is due to commence on site in December 2023. The need for the changes arises due to current housing needs of the returning Agar Grove estate community (including an increase in family sized and wheelchair units); responding to current and emerging building regulations; and to take into account lessons learnt during the first phase of the development – particularly relating to Passivhaus.

1.8 The proposed changes have been developed in the context of the key principles established by the original consent and are considered to improve the development from a housing and design perspective. The changes are considered to represent a minor material amendment to the approved scheme and so this application is submitted pursuant to s73 of the Town and Country Planning Act 1990 (as amended) to allow a variation to conditions attached to the original consent relating to approved drawings.

1.9 In summary, the changes comprise:

- Addition of a second stair core and evacuation lifts to both buildings within Block B in response to changing approaches to fire safety
- An amended mix of unit types to reflect the needs of the community, including an increase in family sized and accessible units
- An overall reduction in unit numbers within Block B from 105 to 94
- Provision of additional cycle storage to meet current planning standards
- An up-dated energy strategy in response to reflect current planning standards
- Minor increase in overall height to accommodate additional insulation
- Changes to the elevations to reflect the new internal layout and requirements of the up-dated energy strategy

1.10 Following on from the above, this application seeks permission for:

“Variation of condition 63 (approved plans) of planning permission ref: 2019/4280/P (as amended) (for demolition of existing buildings and structures except Lulworth House and Agar Children’s Centre (249 existing Class C3 residential units and 2 retail units), and erection of new buildings ranging between 4 and 18 storeys in height along with the refurbishment and extension of Lulworth House to provide Class C3 residential units; a community facility (Class D1); 2 flexible retail shop (Class A1) or restaurant and cafe (Class A3) units; business space (Class B1(a)); 2 flexible retail shop (Class A1), business (Class B1) or non-residential institution (Class D1) units), namely to allow adjustments to Block B, including addition of second stair cores and evacuation lifts; revised unit mix; reduction in 11 units; additional cycle storage; and changes to external appearance”.

## **Purpose and structure**

- 1.11 All development proposals take place in the context of national, regional and local planning policy and recognised best practice. This document reviews the planning context for the issues associated with the development and is structured as follows:
- Section 2 provides an overview of the proposals
  - Section 3 sets out the planning policy context for the project;
  - Section 4 considers the key planning issues associated with the development; and
  - Section 5 sets out our summary and conclusions.

## Other supporting documents

1.12 This document forms part of a series of reports submitted in support of the application and should be read in conjunction with these other documents which include:

- Application forms and notices by CMA Planning
- Application drawings by Hawkins Brown
- Design and Access Statement by Hawkins Brown
- Energy and Sustainability Report by Max Fordham
- Daylight and Sunlight Reports by Anstey Horne
- Noise Assessment by Stantec
- Fire Statements by Design Fire Consultants



## 2.0 OVERVIEW OF THE PROPOSALS

### The Application Site

- 2.1 As illustrated in Figure 2.1 below, the application site comprises a circa. 2.75-hectare parcel of land known as the Agar Grove Estate. The Estate is centrally located in the borough to the east of Camden Town in a predominantly residential area which comprises a mix of period (Georgian and Victorian) housing; post-war municipal estates; 20<sup>th</sup> century in-fill; and some remnants of light-industrial activity.
- 2.2 The Estate is broadly bordered to the north by Agar Grove; to the east by Camley Street; to the south by London Overground railway line; and to the west by Wrotham Road.
- 2.3 Prior to implementation of the consented redevelopment the estate comprised some 249 dwellings arranged as a series of low/medium rise blocks of flats and an 18 storey tower (Lulworth House) arranged around a series of open spaces and associated car-parking and access roads.



Figure 2.1: Aerial site plan (pre-development)

## **Project Overview**

- 2.4 The project forms part of Camden's 'Community Investment Programme' (CIP) which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP forms a central part of the Council's strategy which seeks to ensure that investment in schools, homes and community facilities can be realised despite cuts in central government funding.
- 2.5 The Agar Grove Estate was included in the CIP programme in July 2011 as a site with potential for development and, following extensive consultation with residents, a planning application was submitted in December 2013 for redevelopment. The application was subsequently approved by the local planning authority in August 2014 (ref: 2013/8088/P).
- 2.6 A key driver to the project is the delivery of high-quality affordable homes with the type and configuration of accommodation tailored towards the needs of the existing residents. Furthermore, the proposals have been designed to enable a single decant as far as possible in order that community cohesion can be maintained, whilst the introduction of new intermediate and market housing will help to create a mixed and inclusive community and generate sufficient capital receipt to deliver the project.
- 2.7 A further key aspect of the project was the decision by the Council (as applicant) to deliver the development in accordance with 'Passivhaus' principles which is an energy performance standard that minimises heating costs through superinsulation, triple glazing and air-tight construction.
- 2.8 Passivhaus represents the ultimate design standard in terms of the "be lean" aspect of energy policy with carbon emissions being primarily reduced by through passive energy efficiency to reduce the demand for energy rather than meet a larger demand with renewable energy sources. In addition to addressing sustainability policies, Passivhaus also provides significant benefits in terms of in-use costs, thereby tackling issues associated with fuel poverty.
- 2.9 Construction works on the development commenced in 2015 and to date Blocks A, F, H and G have been completed created 95 new homes.

2.10 An amended planning permission was issued by the local planning authority in October 2020 to facilitate amendments to Blocks I and JKL (ref: 2019/4280/P) and construction work is underway on the element which is due to complete in January 2024 delivering a further 125 new homes.

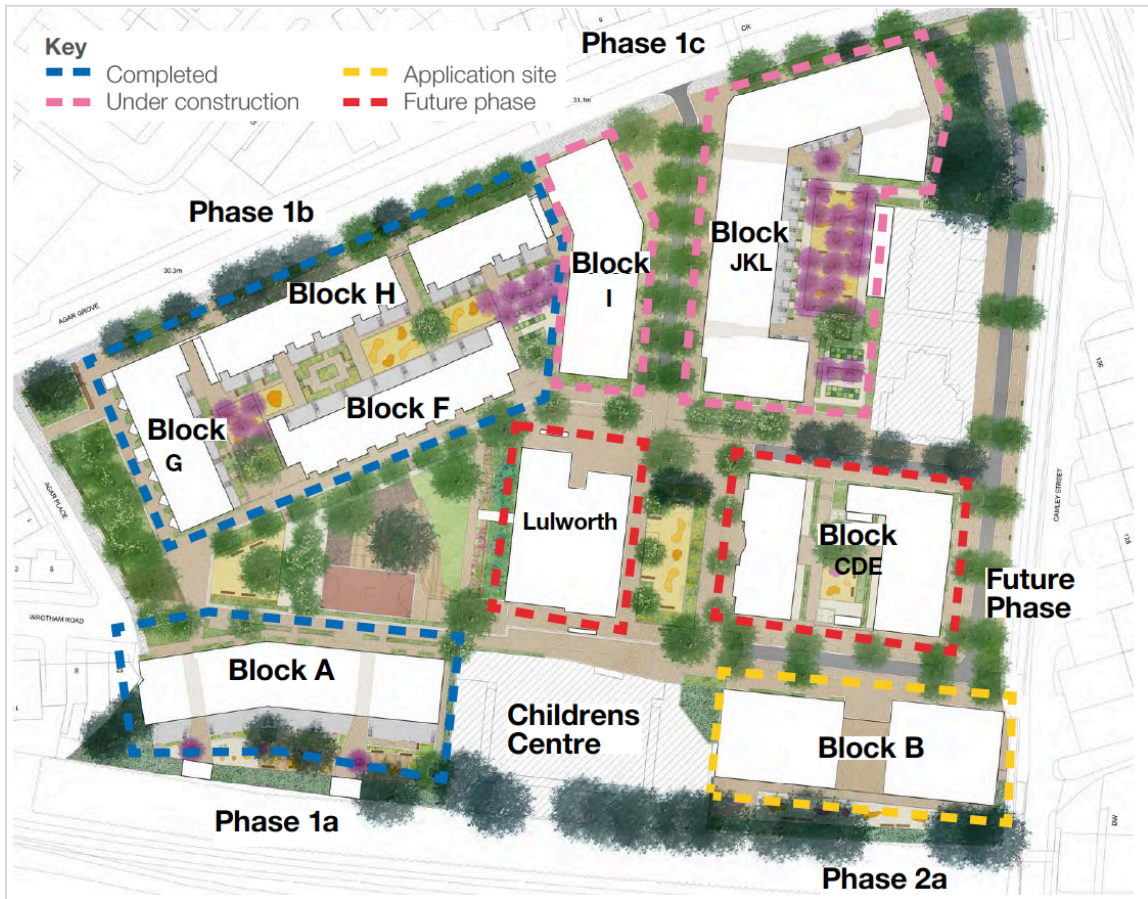


Figure 2.2: Site layout illustrating current construction status

## **Block B**

- 2.11 This application seeks permission to amend the existing planning permission in relation to Block B for which construction works are scheduled to commence in December 2023.
- 2.12 Block B is located in the south-eastern corner of the estate and comprises two linked residential buildings (B1 and B2) joined by a central double-height lobby and concierge space. The blocks also contain community facility, workspace and estate management office, along with plant, refuse and cycle storage facilities.
- 2.13 The western building (B1) sits adjacent to the Agar Children's Centre and is seven stories in height, whilst the eastern building (B2) anchors the south-eastern corner of the development at rises to eighteen storeys.

## **Proposed Changes**

- 2.14 The need for the amendments arises due to changes in the housing needs of the returning Agar Grove estate community (including an increase in family sized and wheelchair units); responding to current and emerging building regulations; and to take into account lessons learnt during the first phase of the development – particularly relating to Passivhaus.
- 2.15 The proposed changes have been developed in the context of the key principles established by the original consent and are considered to improve the development from a housing and design perspective. The Design and Access Statement submitted as part of the application includes a detailed overview of the changes which can be categories as follows:

### ***(i) Legislation up-dates***

- 2.16 The following changes are proposed in response to recent changes in Building Regulations and to reflect emerging best practice relating to fire safety:
- an increase in the commercial sprinkler tank capacity due to changes in British Standards
  - addition of a residential sprinkler tank
  - addition of a second stair, lobbied corridors and evacuation lift in response to forthcoming British Standard (BS-9991)
  - additional bike storage provided in response to current policy
  - energy strategy up-dated to reflect current policy and legislation

**(ii) Passivhaus design**

2.17 The following changes are proposed in response to lessons learned during the earlier phases of development in order to better achieve Passivhaus standards:

- glazing to solid ratios have been reduced to minimise heat gains during the summer
- Mechanical Ventilation with Recovery (MVHR) units added to each dwelling

**(iii) Mix of residential unit types**

2.18 The mix of unit types has been up-dated to respond to the current needs of returning Agar Estate residents, including an increase in the number of larger family units. 11 wheelchair units (M4(3)) are also incorporated into Block B in order to bring the site wide number of wheelchair units up to 10% to meet the requirements of the original consent.

2.19 As a result of the up-dated mix and physical changes (notably the additional core) the total number of units within Block B is reduced from 105 to 94 units. Block B remains 100% affordable housing as per the consented mix.

2.20 The following table summarises the proposed change in the unit mix for Block B in response to the housing needs of the Agar Estate residents who are returning to the site. Further details of the revised mix is set out in Section 4 below.

Unit Type	Consented Units Nos	Proposed Units Nos	Change
1B / 2 P	28	26	-2
2B / 3P	29	30	+1
2B / 4P	48	28	- 20
3B / 5P	0	10	+10
TOTAL	105 units	94 units	- 11 units

**(iv) Non-residential floorspace**

2.21 As noted above, Block C also provides a new community facility and workspace at ground and first floor. As a result of the proposed changes to the residential layouts, revised cores and back of house facilities, the layout of these spaces has been up-dated which results in a small change to the non-residential floorspace as summarised below.

	Class D1 Space (Community space and estate management office) (GIA)	Class B1 Workspace (GIA)
Consented Scheme	538sqm	475sqm
Proposed Scheme	461sqm	539sqm
Change	- 77sqm	+ 64 sqm

**(v) Cycle parking**

2.22 The cycle storage facilities within Block B have been up-dated to accord with current London Plan standards which results in an increase in capacity compared to the approved scheme despite the small reduction in overall residential unit numbers.

2.23 A total of 175 long stay and 4 short stay cycle spaces are now proposed to serve the residential element of the scheme with a mix of Sheffield stands, accessible stands and cycle racks located within secure and covered storage areas. In addition, 10 long stay and 6 short stay spaces are provided to serve the non-residential element of the scheme.

**(vi) Energy**

2.24 As noted above, a key element of the Agar Grove project is delivering the development in accordance with 'Passivhaus' principles in order to mitigate the carbon emissions associated with the development and to reduce fuel costs for future residents.

2.25 An up-dated Energy Strategy is submitted as part of the current application which sets out how air-source heat pumps are now proposed for the amended proposals for Block B in order to achieve a 65% reduction in carbon emissions for the residential element of the scheme in comparison with Part L of the 2013 Building Regulations.

## **Pre-application public consultation**

- 1.1 The Agar Grove project has been the subject of extensive consultation with the local community since the outset, and the approved scheme was developed in response to the view of the community and other key stakeholders.
- 1.2 In order to ensure that local residents (both within the estate and in the local area) and amenity groups had the opportunity to comment on the amendments being proposed as part of this application, a two-day consultation event took place in May 2022 in the Community Hall on the ground floor of Lulworth House.

### **3.0 PLANNING POLICY CONTEXT**

- 3.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with relevant development plan policies, unless other material planning considerations indicate otherwise.
- 3.2 For this purpose, the statutory development plan comprises The London Plan and the Camden Local Plan. In addition, national planning policy, non-statutory supplementary guidance and emerging policies are relevant material considerations. We set out below the planning policy context against which the application proposals should be considered.

#### **National Planning Policy**

- National Planning Policy Framework (NPPF) (2021)
- National Planning Practice Guidance (on line)

#### **Regional Planning Policy**

- The London Plan: (2021)
- Affordable Housing and Viability SPG (2017)
- Housing SPG (2016)
- Energy Planning Guidance (2020)
- Draft Fire Safety LPG (2022)
- Draft Housing Design Standards LPG (2022)

#### **Local Planning Policy**

- Camden Local Plan (2017)
- Housing CPG (2021)
- Design CPG (2021)
- Energy Efficiency and Adaptation CPG (2021)



## Site Designations

- 3.3 As illustrated in the extract from the Camden Policies Map (2017) below the site is not designated for any specific development proposal; however, the following designations are relevant to the site and wider area:
- (i) Open Space – a small area within the north-west quadrant of the site is identified as open space.
  - (ii) Designated View – the landmark viewing corridor and lateral assessment areas associated with the protected vistas from Parliament Hill and Kenwood towards St Paul's Cathedral pass just inside the eastern and western boundaries of the site.
- 3.4 The Policies Map also identifies that the area to the north of Agar Grove and west of Wrotham Road form part of the Camden Square and Camden Broadway Conservation Areas respectively, whilst the Rochester Conservation Area lies approximately 360m to the north-west.

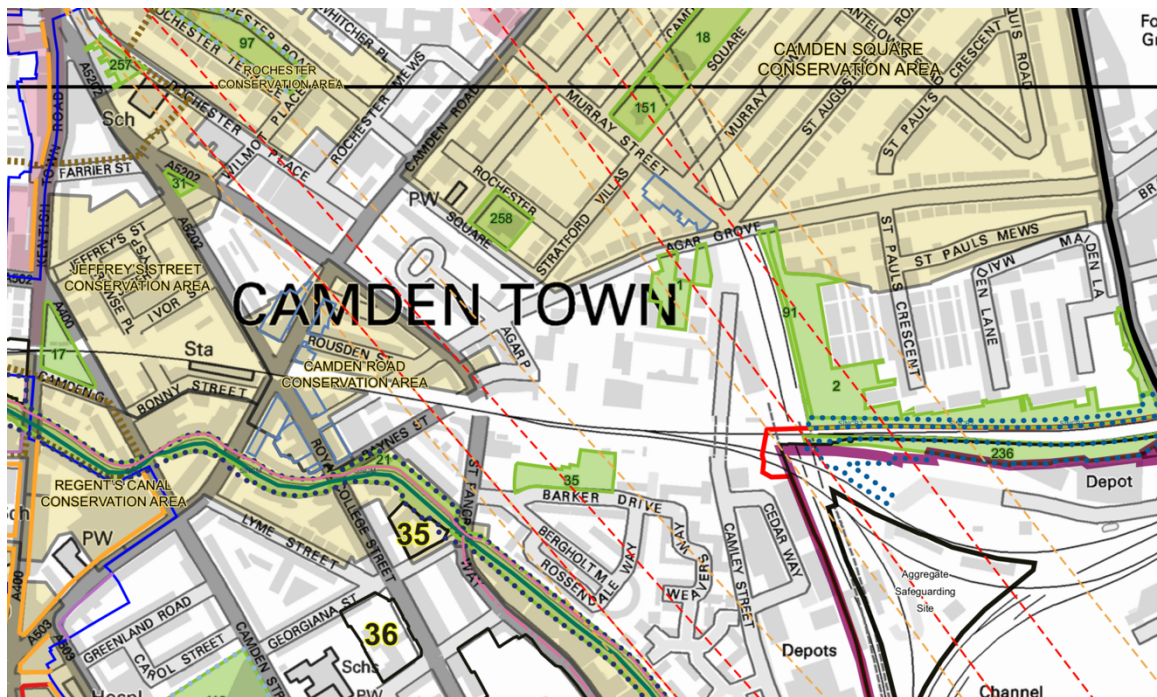


Figure 3.1: Extract from the Camden Policies Map (2017)



## **4.0 PLANNING ASSESSMENT**

- 4.1 In light of the development objectives of the project, and in the context of the planning policy framework set out above, the following paragraphs consider the key planning issues associated with the application proposals.
- 4.2 In accordance with s38(6) of the Planning and Compulsory Purchase Act 2004, determination of this application must be in accordance with national, regional and local planning policies unless material planning considerations indicate otherwise. The implemented consent is a material planning consideration and the development that this application seeks to amend has, by definition, been judged to be acceptable by virtue of the local planning authority's decisions in August 2014 and October 2020.
- 4.3 Accordingly, the following assessment focuses on the planning policies, or other material planning considerations, that have changed significantly since the previous grant of permission, as well as the changes sought.

### **A. General Principle of Development**

- 4.4 A key theme of national, regional and local policies is to secure the efficient use of resources. This objective is a common thread running through the NPPF, the London Plan and the Camden Local Plan, which all encourage more sustainable patterns of development. The NPPF re-affirms the Government's commitment to delivering better outcomes via the planning system, whilst the London Plan and Camden Local Plan both highlight the need to deliver sufficient accommodation to meet London's housing needs.
- 4.5 The Agar Grove project forms part of Camden's 'Community Investment Programme' (CIP) which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP forms a central part of the Council's strategy which seeks to ensure investment in schools, homes and community infrastructure despite reductions in central government funding.
- 4.6 The planning permission that this application seeks to amend was originally approved by the local planning authority in 2014 (and amended in 2020) and the first phases of development have been completed delivering much needed high-quality new homes for the community.
- 4.7 The early phases of the project (Blocks A, F, G and H) have been widely recognized for the projects approach towards sustainable housing and place-making including

being decorated with the following awards:

- RICS Award 2022; Phase 1b Residential category London – Winner
- New London Award 2021; Phase 1b Large built scheme in the Housing category – Winner
- Passivhaus Trust Award 2021; Phase 1a Large Building Category Winner
- CIBSE Building Performance Awards 2020 – Phase 1a Project of the Year - Residential – Winner
- New London Award 2019 Phase 1a Overall Winner
- New London Award 2019 Phase 1a Sustainability prize -Winner
- London Planning Awards 2019 –Phase 1a The Mayor's Award for Sustainable and Environmental Planning –Winner
- London Planning Awards 2019 –Phase 1a Good Growth –Winner
- Housing Design Awards 2015 – All phases Project Schemes -Winner

4.8 It is clear that the Agar Grove Estate Regeneration project is making a significant contribution towards the provision of much needed new housing in the borough – including a significant proportion of affordable homes – within a high-quality and highly sustainable development.

4.9 The proposed amendments are sought in order to up-date the mix of units within Block B to better reflect the current housing needs of returning residents; to take into account recent and emerging changes in building regulations; and in response to lessons learnt from the completed phases, particularly in relation to achieving Passivhaus.

4.10 Accordingly, it is considered that the principle of the proposed amendments which will assist in the delivery of this much-needed mixed-tenure housing scheme to meet the needs of the community is appropriate, and the project's role in the Council's wider CIP should be afforded significant weight in the decision-making process.

## B. Housing Considerations and Affordable Housing Statement

- 4.11 As set out above, the proposed amendments are being put forward in response to the current housing needs of returning residents and to bring the design up to current regulatory requirements. As a result, the overall number of units within Block B is reduced when compared to the approved scheme due to a reduction in the overall residential floorspace (as a result of the additional core) and an increase in larger family sized units.
- 4.12 The approved scheme comprises a total of 507 new homes, of which 256 are affordable which equates to 50% provision on a unit basis, or 56% on a habitable rooms basis, with a mix of social rent and intermediate accommodation. As set out in the tables below, the amended scheme would deliver a slightly reduced number of socially rented units (minus 11) due to the revised unit mix and changes to the internal layout.

<b>Breakdown of consented and proposed accommodation</b>			
TENURE	CONSENTED UNITS	CONSENTED HAB ROOMS	CONSENTED FLOORSPACE (SQM) (NIA)
Social rent	216 (42.6%)	709 (50%)	16,767 (45.1%)
Intermediate	40 (7.9%)	91 (6.4%)	2,514 (6.8%)
Market	251 (4.5%)	618 (43.6%)	17,899sqm (48.1%)
<b>TOTAL</b>	<b>507 units</b>	<b>1,418 hab rooms</b>	<b>37,210 sqm (NIA)</b>
TENURE	PROPOSED UNITS	PROPOSED HAB ROOMS	PROPOSED FLOORSPACE (SQM) (NIA)
Social rent	205 (41%) (- 11 units)	698 (50%) (-11 hab rooms)	16,478 (44.7%) (-319sqm)
Intermediate	40 (8%) (no change)	91 (6%) (no change)	2,514 (6.8%) (no change)
Market	251 (51%) (no change)	618 (44%) (no change)	17,899 (48.5%) (no change)
<b>TOTAL</b>	<b>496 units</b> <b>(-11 units)</b>	<b>1,407 hab rooms</b> <b>(-11 hab rooms)</b>	<b>36,891sqm</b> <b>(-319 sqm)</b>

Change in floorspace by tenure of consented and proposed accommodation			
TENURE	CONSENTED FLOORSPACE (NIA) / %	PROPOSED TOTAL FLOORSPACE (NIA) / %	CHANGE TOTAL FLOORSPACE (NIA) / %
Market	17,899 (48%)	17,899 (48.5%)	No change
Affordable (social rent and intermediate)	19,311 sqm (52%)	18,992 sqm (51%)	- 319sqm (1.6% reduction)
TOTAL	37,210sqm	36,891sqm	- 319sqm (0.8% reduction)

Change in dwelling mix by tenure of consented and proposed accommodation										
TENURE	Studio		1 bed		2 bed		3 bed		4 bed	
	Consent	Proposed	Consent	Proposed	Consent	Proposed	Consent	Proposed	Consent	Proposed
Social rent	0	0	72	70	79	60	40	50	25	25
Intermediate	1	1	23	23	14	14	0	0	0	0
Market	17	17	117	117	109	109	9	9	0	0
<b>TOTAL</b>	<b>18</b>	<b>18</b>	<b>212</b>	<b>210</b>	<b>202</b>	<b>183</b>	<b>49</b>	<b>59</b>	<b>25</b>	<b>25</b>

- 4.13 When considering the proposed amendments, it is important to note that the overall change in the proportion of affordable housing across the development as a whole would be very small (less than a 1% reduction). Moreover, the reduction is inevitable due to the reduced floorspace available in Block B and increase in family units. Furthermore, it is important to note that there is no increase in the number of market units or floorspace as a result of the proposed amendments.
- 4.14 It is, therefore, considered that the proposed changes are acceptable when taking into account the technical design and housing needs considerations reasons which are determining the changes which should be afforded significant weight in favour of the proposed amendments.

### **C. Non-residential floorspace**

- 4.15 There is an existing small community room in the ground floor of Lulworth House extending to circa. 90sqm, however, the space has not been well used for a number of years and provides limited value for residents living on the estate.
- 4.16 As part of the approved scheme a new community facility was provided in the base of Block B extending to 502sqm although the size of the new facility was primarily a function of the space available within the building as opposed to meeting a specific programme or brief.
- 4.17 As a result of the proposed changes to Block B put forward as part of this application it has been necessary to revise the layout of the new community space which has also reduced in area to 441sqm. However, this still represents a significant quantitative increase over the existing facility on site and the proposed space is considered to be of high-quality and capable to supporting a range of activities to serve the community's needs.
- 4.18 The approved scheme also includes 475sqm of Class B1 business space in the base of Block B. Whilst providing employment space was not a policy requirement of the approved scheme (i.e. there is no existing employment space and the site does not fall within a designated employment area), this was considered a benefit of the scheme in terms of job creation and providing an active use to animate the pedestrian and cycle link to Camley Street.
- 4.19 As a result of the wider changes to Block B the configuration of the B1 accommodation has been amended resulting in a small increase (+64sqm) in floorspace which is not considered significant when taken as part of the scheme as a whole. The amended B1 floorspace is considered to be of high-quality and still performs the important role of animating the base of Block B adjacent to the Camley Street link.

## D. Design Considerations

- 4.20 The NPPF places considerable emphasis on the importance of achieving high-quality design. The Framework states that 'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.' (paragraph. 124).
- 4.21 The London Plan sets out policies on a range of issues about the places and spaces in which Londoners live, work and visit that are integral to delivering the Mayor's vision and objectives.
- 4.22 Policy D1 also states that development design should 'respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions'. Development design should 'be of high quality, with architecture that pays attention to detail,' and uses 'attractive, robust materials which weather and mature well'.
- 4.23 At a local level Policy D1 sets out Camden's general approach noting that "good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations" (paragraph 7.1). The policy sets out a series of requirements against which development proposals will be assessed.
- 4.24 In terms of design it is relevant to note that from the outset of the project the brief has been to deliver an exemplary scheme in terms of its urban design and architectural quality, which is reflected in the Council's decision to appoint Hawkins\Brown, MAE and Grant Associates who are each award-winning practices with a proven track record of delivering the highest design quality.
- 4.25 In granting planning consent in 2014 the Committee Report notes that, "this is considered to be an exceptional proposal which is strong in all aspects of design, from the masterplan layout right through to the detailed consideration of the doorstep experience. Underlying this is a good commitment to high quality detailing and materials, which will be secured in fill via condition. The spaces and buildings form a legible townscape which is familiar and contextual. It is considered that the will become truly permeable and accessible" (paragraph 6.70).



- 4.26 It is notable that the first completed phase of the project – Block A – was awarded the 2019 ‘Overall Winner of the annual New London Awards’, along with the ‘Sustainability Prize’, which re-affirms the assessment of the original application that the proposals will result in a high-quality development.
- 4.27 The Design and Access Statement (DAS) submitted as part of the application provides a detailed description of the scheme and a comprehensive review of the design issues associated with the changes sought as part of this application. As set out in the DAS, the changes retain the key principles established by the approved scheme, whilst seeking to incorporate a number of improvements based on lessons learnt during the first phase of construction.
- 4.28 The proposed changes to the building form are considered minor both in terms and relative to overall scheme, and would not result in a scheme that is substantially different from the approved development. Accordingly, it is considered that the proposed amendments comply with the requirements set out in the relevant policies, and would result in a high-quality design which is in-keeping with the prevailing townscape, whilst responding to technical and housing needs drivers of the project.

## **E. Daylight and Sunlight**

- 4.29 Policy D9 of The London Plan states that the impact of tall buildings on daylight and sunlight must be carefully considered and should not compromise comfort and the enjoyment of open spaces around the building.
- 4.30 Policy A1 of the Camden Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours and that sunlight, daylight and overshadowing will be factors taken into account when considering whether planning permission should be granted for development. The policy notes that the Council will take into account the Building Research Establishment (BRE): “Site Layout Planning for Daylight and Sunlight – A Good Practice Guide” (2011) when assessing proposals.
- 4.31 Further guidance is provided in the Council’s Planning Guidance (2021) noting the BRE document is intended to provide guidance to developers and decisions makers and should be regarded as a guide rather than policy.
- 4.32 The design process for the consented proposals was supported by a detailed assessment of sunlight and daylight using the BRE Guide to ensure that

development did not give rise to any unacceptable detrimental impact on the amenity of neighbouring properties, whilst also ensuring a good level of amenity for future occupiers.

- 4.33 The proposed amendments have been further assessed using the Guide with respect to the impact of the development on 1-25 Agar Grove (to the north), 120-230 Barker Drive (to the south) as well as Cranbourne House, Ferndown House and the Agar Community Nursery, which are existing buildings within the estate boundary but outside the application site red-line.
- 4.34 As set out in the 'Sunlight and Daylight Report' by Anstey Horne and Co, the scheme will not unduly compromise the amenity of neighbouring residential properties taking into account the dense urban context of the project and the level of impact accepted under the approved scheme. An internal Daylight Assessment prepared by Anstey Horne is also submitted as part of the application which demonstrates that the level of daylight amenity within the proposed units is acceptable.

## **F. Environmental Noise**

- 4.35 Policy A4 of the Local Plan states that the Council will seek to ensure that noise and vibration is controlled and managed, and that development should have regard to Camden's Noise and Vibration Thresholds set out in Appendix 3.
- 4.36 A Noise Impact Assessment prepared by Stantec is submitted in support of the application to consider the impact of existing environmental sound levels on the proposed residential accommodation taking into account the proposed amendments to the approved building facades, as well as the impact plant within the buildings on amenity.
- 4.37 As set out in the Assessment, the Block B proposals as amended will still meet the Council's standards for new residential development in terms of noise and vibration and that external environmental noise sources will not have an adverse effect on the amenity of residents living within the proposed buildings. In addition, the proposed emergency and non-emergency plant within the part of the wider development accords with the Council's amenity standards.

## **G. Sustainability considerations**

- 4.38 As noted above, the Agar Grove project is being developed in accordance with 'Passivhaus' principles which is an energy performance standard that minimizes heat costs through superinsulation, triple glazing and air-tight construction along with heat recovery and mechanically vented air.
- 4.39 Passivhaus represents the ultimate design standard in terms of the 'be lean' aspect of energy policy with carbon emissions being primarily reduced by implementing passive energy efficiency to reduce the demand for energy rather than meet a larger demand with renewable energy sources.
- 4.40 The application is accompanied by an Energy and Sustainability Up-Date Report, prepared by Max Fordham, who have formed an integral part of the design team to ensure that environmental and sustainability considerations have been taken into account at all stages of the design development process.
- 4.41 As detailed in the Report, the approved scheme was designed on the basis of achieving a 40% reduction in CO<sub>2</sub> over 2010 Part L which reflected the relevant planning policy requirements at the time of the decision. This 40% overall reduction was to include a 20% reduction in CO<sub>2</sub> emissions from on-site renewables. However, as the carbon intensity of the grid continues to reduce, new emission factors have been released as reflected in the draft London Plan. To reflect this, the carbon reduction has now been calculated using SAP 10 carbon emissions factors and taking into account the design changes proposed by this application.
- 4.42 Overall, the proposed measures under the Be Lean, Be Clean and Be Green stages of the hierarchy would cumulatively result in a total carbon reduction of 69% across the residential areas of the development and a 35% reduction for the non-residential, resulting in a total site wide saving of 65% against Part L 2013.

## **H. Transport considerations**

- 4.43 The overarching aim of planning policy at all levels is to promote more sustainable patterns of development, including locating uses in areas which are accessible by public transport, cycling and walking in order to reduce the need to travel by private car.
- 4.44 In order to encourage more sustainable forms of travel minimal car-parking is provided in the approved scheme, with spaces only being made available to disabled residents and existing residents who currently hold a car-parking permit.

All other units within the development are 'car-free', whilst the scheme includes a range of measures to encourage sustainable means of travel.

- 4.45 As part of the proposed amendments to Block B the cycle parking facilities have been up-dated to reflect current London Plan requirements which results in an increase in facilities compared to the consented scheme. A total of 175 long-stay and 4 short stay spaces are now proposed to serve the residential element of the scheme, along with 10 long-stay and 6 short-stay to serve the community and workspace which accords with current standards.

### **I. Fire Safety**

- 4.46 London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. The Mayor of London has published draft guidance of Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5) and Fire Statements (Policy D12(B)).
- 4.47 As set out above, a key driver to the proposed amendments to Block B is responding to current and emerging requirements in relation to fire safety, including the addition of sprinkler tanks, lobbied corridors and a second s stair and evacuation lift in each building.
- 4.48 The application is accompanied by a Fire Statement (and Gateway One Form) prepared by Design Fire Consultants which sets out how fire safety measures have been considered as part of the design amendments for Block B, and confirms that the relevant statutory requirements and best practice have been incorporated in the proposals.

## **5.0 SUMMARY**

- 5.1 This Statement is submitted in support of an application for a minor material amendment to planning permission 2019/4280/P relating to the regeneration of the Agar Grove Estate.
- 5.2 The Agar Grove project forms part of Camden's 'Community Investment Programme' (CIP) which aims to generate investment, deliver new homes and regenerate neighbourhoods.
- 5.3 Full planning permission was granted by the local planning authority in August 2014 and amended in 2020 for the comprehensive redevelopment of the site to create a new mixed-tenure development comprising new homes, retail, business and community space, set within a series of high-quality new buildings and landscape.
- 5.4 The original permission was implemented in 2015 and to date Blocks A, F, G and H have been completed delivering 95 new homes, whilst construction works on Blocks I and JLK is due to complete in January 2024 delivering a further 125 new homes.
- 5.5 This application seeks permission to amend the planning permission in relation to Block B – which is due to commence on site in December 2023. This application seeks permission to amend the planning permission in relation to Block B – which is due to commence on site in December 2023. The need for the changes arises due to current housing needs of the returning Agar Grove estate community (including an increase in family sized and wheelchair units); responding to current and emerging building regulations; and to take into account lessons learnt during the first phase of the development – particularly relating to Passivhaus.
- 5.6 The proposed changes have been developed in the context of the key principles established by the original consent and are considered to improve the development from a housing and design perspective. The changes are considered to represent a minor material amendment to the approved scheme and so this application is submitted pursuant to s73 of the Town and Country Planning Act 1990 (as amended) to allow a variation to conditions attached to the original consent relating to approved drawings.

5.7 In summary, the changes comprise:

- Addition of a second stair core and evacuation lifts to both buildings within Block B in response to changing approaches to fire safety
- An amended mix of unit types to reflect the needs of the community, including an increase in family sized and accessible units
- An overall reduction in unit numbers within Block B from 105 to 94
- Provision of additional cycle storage to meet current planning standards
- An up-dated energy strategy in response to reflect current planning standards
- Minor increase in overall height to accommodate additional insulation
- Changes to the elevations to reflect the new internal layout and requirements of the up-dated energy strategy

5.8 For these reasons, it is considered the scheme is acceptable in planning terms, and that permission should therefore be granted.