

June 2014

# **Addendum to Town Planning Statement**

**Former Territorial Army Site, 65-69 Parkhurst Road, Islington, N7 0LJ**

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## Appendices

### 1. Response to Consultees

# 1. Introduction

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- 1.1 This addendum planning statement is submitted in support of revisions to a full planning application for the redevelopment of the former Territorial Army (TA) centre at 65 – 69 Parkhurst Road in the London Borough of Islington (LBI).
- 1.2 The application was submitted on the 6th December 2013 (ref: P2013/4950/FUL) for:
- “Demolition of existing buildings and erection of new buildings rising to part 4, 5, 6 and 7 storeys (including a basement on part of the site), to deliver 150 new residential homes (use class C3) in a mix of unit sizes and tenures, together with associated cycle parking, accessible car parking, highways, landscaping and infrastructure works.”*
- 1.3 Revisions are proposed to the application scheme to take account of comments made by the Council, statutory consultees and local residents. The amended description of development is set out below:
- “Demolition of existing buildings and erection of new buildings rising to part 4, 5, and 6 storeys to deliver 112 new residential homes (use class C3) in a mix of unit sizes and tenures, together with associated cycle parking, car parking, highways, landscaping and infrastructure works.”*
- 1.4 This addendum should be read in conjunction with the full Town Planning Statement submitted with the application in December 2013.

## **BACKGROUND**

- 1.5 Prior to the submission of the application, pre-application advice was sought from the local authority. Design issues were raised by the local authority in relation to the contextual analysis, site layout, and height, bulk and massing. Notwithstanding these issues, the design team submitted the application with justification considered adequate to demonstrate the acceptability of the proposals.
- 1.6 Following submission Council Officers maintained their concerns with certain aspects of the submitted scheme. Consequently a number of further meetings were held with Council Officers to discuss these concerns. Additional meetings were held with

Council Officers on the following dates:

- 12th February 2014;
- 24th March 2014; and
- 22nd April 2014.

1.7 It was subsequently agreed with the Council that revisions to the scheme could be submitted and our client entered into a Planning Performance Agreement with the Council on this basis.

1.8 In addition to the meetings with Council Planning Officers, the applicant also revisited the Streetbook Surgery and Design Review Panel to present the proposed revisions to Council Officers and Panel members. The revisions to the application hereby submitted are a reflection of the extensive consultation with Officers at the London Borough of Islington (LBI) since the submission of the application, and incorporate the feedback and guidance received.

#### **ACCOMPANYING REPORTS**

1.9 As a result of the revisions summarised above, a number of the December 2013 application documents have been replaced, or updated. The table below provides details of the status of each report.

1.10 In addition to the above, a Historic Environment Report, prepared by Donald Insall Architects is submitted.

<b>Original Application Document</b>	
Planning Application Form and Certificates	For updated description of development please see above.
CIL forms	Replaced
Site Location Plan	No change
Accommodation Schedule	Replaced
Drawing Schedule	Replaced

Application Drawings as listed on Drawing Schedule	Replaced
Town Planning Statement (including Affordable Housing Statement and Draft s106 Heads of Terms)	Addendum to be read in conjunction with full Town Planning Statement. Draft s106 Heads of Terms will be provided separately.
Design and Access Statement	Replaced
Townscape and Visual Impact Assessment	Replaced
Access Statement	Replaced
Market Housing Demand Profile in Islington	No change
Transport Assessment (including PERS Audit, Stage 1 Safety Audit and Refuse Strategy)	Replaced
Draft Residential Travel Plan	Replaced
Statement of Community Involvement	Replaced
Sustainability Statement (including Code for Sustainable Homes Pre-Assessment and Green Performance Plan)	Replaced
Energy Strategy Report	Replaced
Noise Assessment	No change. See consultation table appended for responses to issues raised.
Air Quality Assessment	No change. See consultation table appended for responses to issues raised.
Daylight and Sunlight Report (including light within)	Replaced
Arboricultural Survey	No change

Arboricultural Impact Assessment	Replaced
Extended Phase 1 Habitat Survey	No change
Bat Survey	Update to be read in conjunction with previous report
Health Impact Assessment	No change
Site Waste Management Statement	No change
Utilities Report	Replaced
Drainage Assessment Report	Replaced
Ground Investigation Report	No change
Financial Viability Assessment	Replaced

## 2. Revisions to Scheme

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2.1 Revisions have been made to the scheme to address comments and concerns received from Council Officers and other consultees. These changes are summarised below, with a full description and justification provided in section 5 of the Design and Access Statement and supporting technical reports:

- Reduction of units from 150 to 112;
- Reduction in the widths of Blocks A, B, E and F;
- General reduction of one floor across all blocks;
- Removal of basement car park and access ramp;
- Reorientation of balconies to overlook future proofed public route and amenity space;
- Increase in the courtyard between blocks A, B and C;
- Revision and enhancement of amenity spaces;
- Increase in distance between block A and Moriarty Close properties; and
- Redesign of Block F fronting Parkhurst Road.

2.2 As a result of the revisions the scheme now proposes the following:

### **HOUSING**

2.3 The revised development will deliver a total of 112 new residential units in a mix of one, two and three and four bedroom units. All homes have been designed to Lifetime Homes and Flexible Homes Standards and 11 units have been designed to be adaptable for wheelchair users. The wheelchair units comprise 1, 2, 3 and 4 bedroom units and are to be located on the ground floor. They are provided across a mix of tenures, with one being for social rent and one for intermediate.

2.4 16 of the units will be provided as affordable housing. This is equivalent to 21% on a habitable room basis or 14% on a unit basis. A mix of tenures is proposed, including: social rent and intermediate. The proposed mix is set out in the table below.

	1 Bed	2 Bed	3 Bed	4 Bed	Total
<b>Market</b>	26	54	16	0	96
<b>Social Rent</b>	0	1	9	1	11
<b>Intermediate</b>	0	5	0	0	5
<b>Total</b>	26	60	25	1	112

- 2.5 The provision of social rent tenure as opposed to affordable rent is a response to Islington's specific and identified need.
- 2.6 The housing offer has been subject to an independent review by Gerald Eve and the findings are set out in the Financial Viability Assessment which is submitted in support of this revised application.

### **DESIGN AND LAYOUT**

- 2.7 As stated in the full planning statement, a design-led approach has been taken to ensure that the layout, scale, massing and architectural style responds appropriately to the site's context. In addition, the scheme has been designed to optimise the potential of the site, whilst respecting neighbouring land uses, the local character, the adjoining conservation area, and the comments received from consultees.
- 2.8 The revised layout contains six blocks, with blocks A – C organised as a horseshoe configuration around a common courtyard to the north west of the site. Blocks D and E are arranged along the east side of the vehicular access road off Parkhurst Road and block F fronts Parkhurst Road.
- 2.9 All buildings are set back from the boundary line to varying degrees to ensure neighbouring properties are respected, and these set backs have been increased since the original submission. The existing site access will be retained and improved to provide a shared surface. The proposed building fronting Parkhurst Road rises to three storeys with a set back fourth storey. The U shaped block rises from part 3, part 4 and part 6 storeys. The building heights of the blocks have been revised carefully to take into account Officer's concerns and surrounding neighbourhood amenity, including overlooking, privacy and daylight and sunlight impact.
- 2.10 The landscape strategy for the site comprises a combination of hard and soft landscaping, as explained within section 6 of the Design and Access Statement. The

strategy has been re-developed by AREA Landscape architects, taking into account the comments received from consultees since submission of the original application.

### **DENSITY**

- 2.11 The proposed development will deliver a density of 610 habitable rooms per hectare. This based on a site area of 0.58 ha.

### **AMENITY AND PLAY SPACE**

- 2.12 In terms of amenity space, all residential units will have access to their own garden (for ground floor units), terraces or balconies.
- 2.13 In addition, a high quality south facing landscaped communal courtyard is proposed providing approximately 200 sqm, together with a smaller entrance plaza of 115 sqm, and an area at the northern end of the access road providing approximately 75 sqm.
- 2.14 Further details can be found in the Design and Access Statement prepared by AHMM Architects.

### **ACCESS, PARKING AND SERVICING**

- 2.15 Parkhurst Road will be used to access the site through the existing improved two-way access road. This will provide for on-site servicing, refuse and emergency vehicle access. Due to the borough's policy on car free developments, the proposal has been designed to provide essential drop-off parking and two accessible parking bays only.
- 2.16 164 cycle parking spaces are proposed within secure cycle stores.

### **SUSTAINABILITY AND ENERGY**

- 2.17 A number of initiatives are proposed to ensure that a sustainable development is delivered, and these measures are set out in detail in the Sustainability Statement and Energy Statement prepared by Wallace & Whittle. A summary of the measures is provided below:
- redevelopment of a brownfield site with excellent links to public transport;

- all homes have been designed to achieve Code for Sustainable Homes Level 4;
- the incorporation of passive design and energy efficiency measures, a Combined Heat and Power (CHP) Plant and Photovoltaic (PV) Panels will deliver a 40% reduction in carbon dioxide emissions;
- provision of biodiverse green roofs;
- sustainable transport measures including a car free development, provision of cycle parking, and a commitment to develop a Travel Plan;
- provision of adequate waste and recycling storage;
- a sustainable mix of housing, in a mix of unit sizes and tenures, and housing for wheelchair users; and
- incorporation of sustainable urban drainage systems.

### 3. Planning Considerations

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3.1 The Planning Statement submitted in December 2013 provides a comprehensive assessment of the key principles of the proposals against the planning policy framework and it is not intended to repeat all of this here, however, an update to these considerations is provided below which reflects the revisions to the application proposals.

#### **PRINCIPLE OF RESIDENTIAL DEVELOPMENT**

3.2 As outlined in the December 2013 Planning Statement the principle of residential development on the site is acceptable. The site is allocated in the Site Allocations DPD (June 2013) as being appropriate for residential development and the revisions do not deviate from the residential land use proposed. It is also noted that we understand that the Council accept the principle of residential development on this site as no issues to the contrary have been raised during the course of the application.

3.3 Whilst it was suggested by the Council that an element of non-residential use should be incorporated fronting Parkhurst Road, Officers subsequently confirmed that this was no longer necessary taking account of the revisions to the scheme.

#### **Housing Mix**

3.4 As a result of the reductions in the height, bulk and scale of the development the number of units being provided has been reduced from 150 to 112. Consequently, the unit mix has been revisited and is now proposed to be as follows:

<b>Unit</b>	<b>Proposed Mix</b>	<b>Percentage Split</b>
1 bed flat	26	23%
2 bed flat	60	54%
3 bed flat	25	22%
4 bed flat	1	1%
Total	112	100%

- 3.5 As demonstrated above, 23% of the homes are provided as family homes (with 3 bedrooms or more). 90% of the social rented accommodation is provided as family housing.
- 3.6 Consequently, the proposals are consistent with the NPPF, London Plan Policy 3.8, part E of Core Strategy Policy CS12 and DMP Policy DM3.1.

### **Affordable Housing**

- 3.7 The revised scheme provides 16 new affordable homes. This is equivalent to 14% of the units, or 21% of the habitable rooms. 11 of these units will be provided in the social rent tenure, and 5 in the intermediate tenure. This is equivalent to a tenure split of 69% social rent and 31% intermediate (on a unit basis), consistent with policy.
- 3.8 The reduction in affordable housing from the original scheme has been as a result of the reduction in the number of units proposed. The proposed quantum and mix of affordable housing reflects viability considerations and the lack of availability of affordable housing grant. An updated Financial Viability Assessment is being finalised by Gerald Eve and this will be submitted on a confidential basis in support of the revisions to the planning application.

### **DESIGN CONSIDERATIONS**

- 3.9 The main design principles underpinning the proposed development are set out in the revised Design and Access Statement prepared by AHMM, and have been summarised below. This should also be read in conjunction with the Townscape and Visual Impact Assessment (TVIA). In addition to these two documents, a Historic Environments report has also been prepared to support the revised proposals.

### **Scale and Massing**

- 3.10 Council Officers raised concerns with regards to the proposed heights and massing of the December 2013 scheme. As a result, the proposals have been reduced in scale and massing across the site. Blocks B, C and F have been reduced by a full storey, and their upper level has now been set back.

- 3.11 In addition to this, the bulk of the scheme has also been reduced. Block A facing Moriarty Close was proposed to be 4 storeys and has now been reduced to 3 storeys, with a set back attic storey. Block E has been reduced from 6 storeys, to 5 storeys with a set back attic level. This block also steps down to 4 storeys at its southern end where it flanks Block F. This responds to concerns from LBI Officers that Block E should not be higher than Block F, and reduces the impact of the block on views from Parkhurst Road.
- 3.12 Blocks A, B, E and F have also been reduced in width. This has allowed for a larger courtyard area between blocks A, B and C and a wider entrance way from Parkhurst Road, again responding to Council Officer comments.

### **Site Layout**

- 3.13 The scheme design has also been revisited to address the concerns of Officers with regards to the site layout. In particular these concerns centred around the legibility and security of the future proofed pedestrian route through the site, and the quality of the amenity spaces. All of these concerns have been addressed in the revised scheme.
- 3.14 One of the most significant changes to the scheme that has been made to address these concerns has been the removal of the basement car park, and associated access ramp. This has resulted in the increased provision of amenity space and a clearer distinction between pedestrian and vehicular areas. A nodal point has been created at the main entrance to the courtyard blocks and this provides an area for public play and amenity. This area is visible from Parkhurst Road and acts as an inviting space.
- 3.15 The future proofed route through the site has also been revisited and is clearly defined, with buildings framing the route and providing good natural surveillance. In particular, the plan of Block E has been amended so that windows and balconies overlook the public route through the site and the amenity space. Front doors are provided into the flats from street level along the route. This surveillance adds to the feeling of security and helps to enhance the welcoming feeling of the amenity spaces. If the Council deem a route connecting Tufnell Park Road to Parkhurst Road to be desirable in the future this scheme would enable this.

- 3.16 The reduction in the width of Block F has also created a wider entrance way to the site, again allowing for greater distinction between pedestrian and vehicular access to the site, and feeding into the improved legibility of the future proofed route through the site which passes through the nodal public amenity and play provision.
- 3.17 The distance between Block A and the rear of the closest Moriarty Close property has also been increased to 6.1m, from 5.1m to provide further separation between the blocks. The buildings on Moriarty Close turn their back on the site, with only a couple of skylights facing towards the proposed development. Consequently there is little opportunity for overlooking and the distances proposed between the buildings are considered appropriate in this context.

### **Heritage**

- 3.18 In order to ensure the revisions to the scheme appropriately addressed the concerns from English Heritage and the Council, a historic buildings advisor (Donald Insall Architects) was brought in to work with AHMMF to refine block F. The result of the collaborative design approach by Donal Insall and AHMM has been that Block F has been considerably reduced in height and scale and the appearance of the block has been re-evaluated. Consequently, the proposal is considered to be more sympathetic to the neighbouring buildings along Parkhurst Road.
- 3.19 The articulation of Block F has been redesigned to reflect the characteristics of other buildings in the area. The block now reflects the surrounding 19th Century houses with a clear distinction between the main bulk of the building and roof level, front doors at ground level, and a terraced frontage. There are no balconies proposed on the Parkhurst Road frontage, as recommended by English Heritage, and the terrace at attic level is set back to reduce any visual intrusion, and is protected from public view by a brick parapet.
- 3.20 As concluded in the Historic Environment report, the revised proposals adequately answer the concerns about the December 2013 scheme in relation to heritage. The TVIA also concludes that, *“In respect of the design considered in its own right, and the relationship between the new buildings and their surroundings, the effect of the new development will be entirely positive”*.

### **Amenity Space**

- 3.21 As with the December 2013 scheme, all of the residential units will have access to private amenity space in the form of balconies, rear gardens, or terraces, in compliance with LBI requirements and the London Housing Design Guide. The units at ground level have benefitted from an increase in private open space as a result of the revisions to the scheme. Similarly, the communal courtyard has been extended and the entrance plaza enhanced.
- 3.22 Further details can be found in sections 5 and 6 of the Design and Access Statement prepared by AHMM Architects.

### **Play Space**

- 3.23 The Mayor's SPG requires the provision of 10 sqm per child. The playspace calculation has been updated to take account of the revisions to the number of units and the requirement for on site playspace for under 5's is 140 sqm. As explained within section 6 of the Design and Access Statement, the scheme will provide several areas suitable for play. In total, 380 sqm is provided across the courtyard playspace, the entrance plaza and the natural play area to the north of the site.
- 3.24 It is noted that DMP Policy 3.6 only requires 5 sqm per child for schemes of this size, therefore, based on local standards the proposals will exceed the LBI requirements in respect of playspace for children under 5.
- 3.25 Details regarding are provided within section 6 of the Design and Access Statement.

### **Density**

- 3.26 As a result of the reduction in scale and massing, the density of the scheme has also reduced. There has been a reduction of 48 units since the December 2013 submission, with the revised scheme now providing 112 units. This results in a density of 610 habitable rooms per hectare, which is comfortably within the London Plan maximum of 700 habitable rooms per hectare in a location such as this.
- 3.27 As with the December 2013 submission the proposals comply with the Council's sustainable design aspirations providing a car free development and providing high quality landscaped amenity and play space. Furthermore, the proposed development

will not have an unacceptable impact on the daylight and sunlight conditions within neighbouring properties, and will not give rise to any potential for overlooking. Accordingly, the proposals do not exhibit any symptoms of overdevelopment and are entirely appropriate given the site context.

### **DAYLIGHT/SUNLIGHT**

- 3.28 Whilst the December 2013 scheme was considered acceptable in daylight and sunlight terms, the reduction in scale and massing of the blocks has further improved the results. The results for daylight and sunlight to the surrounding properties show that the all rooms and windows analysed will meet, or be sufficiently close to, the BRE Guidelines. The results also demonstrate that the amenity spaces will receive an adequate amount of sunlight with respect to the BRE Guidelines and planning policy.

### **TRANSPORT**

- 3.29 The development will remain car free in accordance with Core Strategy Policy CS10 and DMP Policy 8.5. The previously proposed basement car park has been removed at the request of Council Officers and the scheme now provides two accessible parking bays at grade. Provision is made on-site for drop-off, and servicing and deliveries.
- 3.30 Residents will not be able to apply for on street parking permits and this will be secured as part of the s106 agreement.
- 3.31 160 cycle spaces will be provided in three covered, secure, and well lit facilities throughout the site. In addition to this, two Sheffield stands will be provided giving 4 visitor spaces for the development. Whilst this does not meet the Council's requirements of 1 cycle space per bedroom, it is still in excess of the Code for Sustainable Homes (CfSH) requirements and the GLA's standards. Previously a significant number of the cycle spaces were provided in the basement car park. As the basement has been removed at the request of Officers this limits the availability of space for cycle parking. Considering the requirements of the GLA and CfSH are being met, and the benefits arising from the loss of the basement, this provision is considered to be acceptable.

- 3.32 Whilst vehicle access remains in the same location, as detailed above, the width of block F has been reduced. This has allowed for a wider access road, and the separation of vehicle access and pedestrian access with planting. Delivery and servicing arrangements will remain on-site as per the December 2013 scheme.

### **ENERGY AND SUSTAINABILITY**

- 3.33 Updates to the Sustainability Statement and Energy Statement have been prepared by Wallace & Whittle to take account of the changes to the scheme and Officer comments.
- 3.34 The Energy report confirms that a combination of the 'Be Lean, Be Clean, Be Green' technologies will reduce the site CO2 emissions by 40%, making the scheme compliant with achieving the London Plan's 40% target.
- 3.35 As with the original application the proposals are considered to be consistent with the objectives of national planning policy guidance, the London Plan, and local policy.

### **ECOLOGY AND TREES**

- 3.36 All of the existing trees will be retained and will be adequately protected in accordance with the recommendations of the Arboricultural Impact Assessment (AIA). This Assessment has been revisited by DF Clarke Bionomique to address the concerns of the LBI Tree Officer, and this includes a tree radar survey to confirm the rooting pattern of trees on the northern boundary of the site. A detailed Method Statement has also been prepared and is included within the AIA. The scheme has been reconfigured to take into account the rooting and crown extent of the existing trees.
- 3.37 In addition to the above, a further Bat survey has also been conducted at the request of LBI Officers. This concluded as follows:

*"Given the survey findings to date, with very limited bat activity during the two nocturnal surveys in 2013, and no bat activity recorded in 2014, it is conclude that the site has a low value to bats".*

## RESPONSES TO CONSULTEES

- 3.38 Whilst this addendum considers the key issues raised in respect of the December 2013 scheme, full responses to the issues raised during the statutory consultation period are provided within the supporting technical reports. A summary of these responses are provided in **Appendix 1**.
- 3.39 A summary response to the issues raised by local residents is also provided at Appendix VI of the Statement of Community Involvement.

## 4. Summary and Conclusions

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- 4.1 This Addendum Town Planning Statement has been prepared on behalf of Parkhurst Road Ltd in support of the submission of revisions to a planning application for the redevelopment of 65 – 69 Parkhurst Road.
- 4.2 The revised application proposals seek to deliver a high quality residential development providing 112 residential units in a mix of unit sizes and tenures, and a highly accessible brownfield site.
- 4.3 A design-led approach has been taken by AHMM architects following a detailed contextual analysis of the site and surrounding, and taking into consideration comments received from consultees.
- 4.4 As with the original scheme, the revised development proposals will generate numerous regenerative benefits for the local area and community, including:
- In accordance with national, regional and local planning policy, the proposed development will make efficient use of this highly accessible urban brownfield site;
  - The development proposal will provide 112 high-quality residential units in a mix of unit sizes ranging from 1 bedroom units to 3 and 4 bedroom family units, which will help the Council to meet and exceed housing targets in accordance with planning policy requirements and in accordance with the Councils housing trajectory which acknowledges residential uses on the site;
  - 21% of the housing (by habitable room) will be provided as affordable housing, providing 11 social rented units, and 5 intermediate units. The social rent units provide a high proportion (90%) as 3 and 4 bed units addressing the need for affordable family housing in the borough.
  - The proposed development will deliver a well defined and legible development, providing front doors onto the street, will promote activity throughout the site, improving the public realm around the site, and will provide the potential for a future link through the site from Parkhurst Road to the north towards Tufnell Park

Road.

- The proposals incorporate a number of measures to deliver a sustainable development, including energy efficiency measures, a CHP and PV Panels to reduce carbon dioxide emissions by over 40%. The new homes have been designed to achieve Code for Sustainable Homes Level 4.

4.5 Overall, the revisions to the proposed development comprises sustainable development and have been designed taking into account consultees comments in conjunction with the site context, and the requirements of national, regional and local planning policies. The proposals have been developed to accord with these policies, and as such, we respectfully request that the Council's Planning Officers recommend that planning permission be granted so that the benefits of the scheme can be realised without delay.