

**DETAILED SCHEDULE OF
PROPOSED VARIATIONS**
(TO PLANNING CONSENT REF: P0708.20)



**DEMOLITION OF EXISTING BUILDINGS AND CONSTRUCTION
OF NEW RESIDENTIAL BUILDINGS (CLASS C3) IN PART 3
AND 4 STOREYS TO PROVIDE 27 NEW DWELLINGS WITH
ASSOCIATED WORKS AND LANDSCAPING.**

**168, STATION LANE
HORNCHURCH
RM12 6LS**

**ON BEHALF OF
YAMATRON LTD**

REV A - 15 AUG 2024

PROJECT REF: 2328

AUGUST 2024

SCHEDULE OF PROPOSED VARIATIONS

(TO PLANNING CONSENT REF: P0708.20)

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REVISION VERSION

A - 15 August 2024 - Paragraph 4.18 adjusted and paragraph 5.8 added. As highlighted within this document in **red text** to address LB Havering letter of Invalidation dated 15th August 2024.

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1. Introduction

- 1.1 This document has been provided to support an application to vary a planning condition(s) as attached to planning consent ref: P0708.20.
- 1.2 This application has originated following planning officer advice relating to an application for Discharge of Condition 3 (external materials) (ref: Q0129.23 submitted 14th June 2023). After an extension of time to determine the application was agreed, planning officer email advice was received (20th September 2023) advising that Q0129.23 would be refused and an application to vary a condition (Section 73) should be made to address a number of perceived discrepancies between information as submitted and drawings as approved under condition 2 of the consent. The applicant withdrew application Q0129.23. A revised application for discharge of Condition 3 (External Materials) is to follow shortly.
- 1.3 The applicant would offer comment that the expectation on submission of application Q0129.23 was that it would be assessed on the merits of the external materials being proposed in their own right. IE. It was not anticipated that the elevations as drawn would necessarily be subject to a more detailed scrutiny. The relatively early deadline for approval of materials as included in condition 3 (before commencement of above ground works) meant that drawings were submitted at the very earliest opportunity and, we would like to highlight, subject to further development. However, Planning Officer email advice of 20th September 2023 was that the drawings could not be approved and no further time was permitted to change the drawings. The application was withdrawn.
- 1.4 The Planning Officer identified four areas of concern and this document seeks to address these in turn.
- 1.5 We have reviewed and considered those concerns. Some variations from approved drawings remain - hence, this application - but we are confident that we can justify the reasoning for the remaining proposed adjustments.
- 1.6 The applicant has tried to communicate with LB Havering to review how some apparent contradictions within the consent can be resolved with a view to smoothing the path towards an agreement. Contradictions include details as included on drawings as consented under condition 2 and; the potential to provide wheelchair adaptable dwellings (in accordance with M4(3)(2)(a)) as required by condition 18 and the provision of privacy screens as scheduled under condition 28. The attempts to review have been unsuccessful but we hope that we can satisfactorily explain our proposals within this document.
- 1.7 This document seeks to reassure that proposed variations to the consented proposals are minor, necessary and/or desirable towards a better quality development for residents and neighbours alike.

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2. Assurance

- 2.1 Explanations and reasoning for the proposed minor variations are outlined in further detail in this document. However, the applicant and design team are eager to assure the Local Planning Authority (and, if necessary, local residents via any public consultation procedure that might be required) that the majority of **proposed adjustments derive from ensuring that the development meets the standards as outlined in the planning consent** (see below.)
- 2.2 We would like to confirm and make it clear that the proposals as adjusted continue to meet the key parameters already set and approved in the planning consent including;
- Footprints to each of the proposed buildings are no larger than those associated footprints as indicated on the planning consented proposals. (See table below)
 - Footprints to each of the proposed buildings sit entirely within the area of their associated footprints as indicated on the planning consented proposals.
 - All heights of all blocks (including upper and lower parapets where applicable) do not exceed the relevant associated heights as indicated on the planning consented proposals.
 - All site layout and operational strategies (ie. access, parking, waste collection, emergency vehicle access and turning etc.) remain as the planning consented proposals.
 - Where apartment layouts have been adjusted (with some associated fenestration adjustment), the primary driver for this has been to ensure that accommodation meets standards as indicated in the planning consent - eg. 'Wheelchair adaptable dwellings' and 'accessible and adaptable dwellings', national minimum space requirements, bicycle parking standards, etc.)
 - A small number of variations to the proposed design result from an initial Secure by Design review meeting (6th July 2023) with a view to ensuring the development meets the requirements of consent condition 12.

Block Reference	Block Footprint Gross External Area as drawn: Planning Consented drawings	Block Footprint Gross External Area as Proposed (Drawings submitted)
A	347.0m ²	346.5m ²
B	379.1m ²	377.9m ²
C	177.7m ²	177.0m ²

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3. Variations and Drivers to Adjustments as Proposed

- 3.1 The industry accepted RIBA Plan of Works illustrates that, invariably, planning consented proposals (typically incorporating design up to RIBA Stage 3) will be required to undergo further design development (RIBA Stage 4) ahead of construction (RIBA Stage 5). It is not uncommon for proposals to change ownership at the completion of stage 3 prior to a resolution by the development's new owner to progress to Stages 4 and 5, often adopting their own design team to assist them.
- 3.2 Regardless of whether the design team is new or ongoing - but especially if it is a new design team - Stage 4 should commence with a thorough review of the consented proposal's regulatory compliance. That review should necessarily include both historic compliance (eg. With the detail of conditions as scheduled in the planning consent that might not be clearly communicated in the approved documents) and future compliance (eg. with a view to ensuring the proposals will meet building regulations and other relevant applicable statutory requirements.) Of particular relevance to this development was that a substantial new suite of building regulations came into effect from June 2022 and would be applicable to the development, but those requirements might not have been anticipated and included in the design that was granted planning consent in February 2021.
- 3.3 Our initial review of planning consented proposals revealed the following significant issues that would require addressing;
- The three apartments identified on the consented layouts as being suitable for provision of Wheelchair Adaptable housing - to meet the requirements of Part M4(3)(2)(a) of the building regulations as required by planning condition 18 - were not sufficiently sized to be able to comply with that requirement.
 - The floor plan layouts (as drawn on the planning consented drawings) appeared not to match the Schedule of Accommodation areas as provided and, in some cases, fell short of the National Prescribed Minimum Standards that planning policy required that they meet. (See Appendix A - Schedule of Accommodation Comparisons of; a) as quoted in the Schedule of Accommodation as included with the planning application documents; b) a schedule of measured Gross Internal Areas as scaled from consented floor plan drawings; and c) the Gross Internal Areas of apartments as developed to date and proposed.)
- 3.4 It must be acknowledged that the drawings as submitted for discharge of condition 3 did include some variation to fenestration on the elevation. However, some of this resulted from proposed adjustments to internal layouts (to ensure that the scheme delivered to the criteria as para 3.3 above) and with some preliminary caution relating to the newly applicable (from June 2022) building regulations - specifically, Approved Document Part O; Prevention of Overheating.
- 3.5 Further detail on variations to information as consented in P0708.20 condition 2 follows.

4. Detailed Variations

History

- 4.1 An application for discharge of external materials was submitted and validated by LB Havering on 14th June 2023.
- 4.2 On 7th August 2023, LB Havering Planning Officer advised that the application was due to be determined on that day, but that a refusal would be issued unless the applicant could urgently agree to an extension of time by return. A revised deadline was agreed of 22nd September 2023.
- 4.3 20th September 2023 - Email communication received from LB Havering Planning Officer outlining reasons for intention to refuse the application to Discharge Planning Condition 3 (External Materials) - ref: Q0129.23. This highlighted the following issues;

'Following a detailed assessment of this application, the following issues have come to light and as such, this application will be refused.

- 1) *The plans do not reflect the previously approved plans for P0708.20, including changes to the fenestration (and the brick detailing).*
- 2) *The plans show details for condition 28 (privacy screens to balconies) but condition 28 doesn't form part of the description of the proposal. In addition, there is no privacy screen to the balcony for unit A-21.*
- 3) *The plans for P0708.20 show a brown roof and PV panels (which is linked to condition 30 – renewable energy), but it is not clear if these form part of this application. There is no roof plan and there is insufficient information regarding the roof materials.*
- 4) *There are concerns regarding the appearance and visual impact of the fibre cement cladding for Block A. (It is suggested that the fibre cement cladding is replaced with a higher quality material e.g. standing seam zinc type cladding or retain the profiled glass plank cladding system as shown on the plans for P0708.20 for any future submission).'*

We address each of these in turn as follows.

‘Plans do not reflect previously approved plans, including fenestration (and the brick detailing)’

- 4.4 As explained above, RIBA Stage 4 works began with a review of the RIBA Stage 3 consented proposals.
- 4.5 In developing Stage 4 drawings alongside a review of consented drawings’ compliance, it was very quickly established that the layouts as consented drawings (as scheduled and approved by Condition 2) did not match the internal areas as outlined in the schedule of accommodation that was also provided. This should not necessarily be a problem but it was discovered that nine of the twenty-seven apartments appeared to achieve internal areas that fell short of National Prescribed Minimum Standards (a planning policy requirement.)
- 4.6 Furthermore, it became clear that the three apartments that had been identified as suitable for proposed wheelchair adaptable housing - to meet M4(3)(2)(a) as condition 18 - were simply not able to meet those standards (e.g. Minimum living and bedroom floor areas and sizes; sanitary provision, circulation space and accessibility of windows.)
- 4.7 The replanning associated with the above alone has meant that it would not be possible to provide elevations that match those as the consented drawings and that this application to vary a condition would also be required. In the first instance, therefore, we include proposals that prioritise the delivery of wheelchair adaptable dwellings that will meet the requirements of Condition 18.
- 4.8 The required increase in size of the three appointed wheelchair adaptable dwellings has inevitably had a knock-on effect to the proposed ground floor layout accommodation to Blocks A and B. We believe we have succeeded in replanning each of these two blocks’ ground floor layouts in a manner that minimises disruption to the location of the entrance and associated stairwell as well as ensuring that car, bicycle and wheelchair storage can be successfully accommodated - generally where previously indicated - to the requisite standards (London Bicycle parking standards; LB Havering Waste Management Practice Planning Guidance for Architects and Developers.)
- 4.9 We hope it can be seen that the floor plan layouts to all upper floors do not vary significantly enough from the consented drawings to be of material concern.

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Fenestration

- 4.10 Some window and door positions have inevitably required adaptation as a result of the replanning of ground floors to Blocks A and B to accommodate the three wheelchair adaptable dwellings and associated adjustments. This includes provision of external doors of requisite minimum width to wheelchair apartments, bicycle stores and refuse stores.
- 4.11 Entrance gates serving externally accessible ground floor level apartments have also had to be sited to ensure that access ramps of reasonable gradient can be included externally within the property demise.
- 4.12 Window sizes generally - The window sizes as illustrated on the condition 3 submission were generally smaller than those of the consented drawings. These had been drawn at a smaller size (though subject to confirmation) in anticipation of the challenge of meeting the newly introduced Part O - Prevention of Overheating. We are glad to confirm that subsequent consultant input has established that the window head heights can be reinstated to those as the originally consented drawings. These have been reinstated on the drawings as submitted with this application.
- 4.13 Window heights - Whilst window head levels are generally reinstated to match those of the consented drawings, it is proposed that window cill levels nonetheless be slightly raised. ie. Planning consented drawings show window cills at internal finished floor level. This application proposes to include window cills at 300mm above internal finished floor levels for the following reasons;
- Forming the window cill to an external wall promotes the opportunity for better fire separation and acoustic separation between the apartments above and beneath the floor level than trying to achieve that detail with floor level windows.
 - Secondly, the design team has observed that when window cills are placed at floor level to apartment buildings, they can often be easily misused - ie. Used for 'easy' storage/ floor mounted furniture (See image below). The proposed development includes a substantial amount of glazing facing towards the public realm. Raised cills (even slightly) will help reduce the risk of clutter being exposed to outside.



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- 4.14 Window widths - Some small amount of variation in window widths has necessarily been included due either to coordination of window widths within standard brickwork opening dimensions, to permit inclusion of the coordinated proposed structural framing to the development or as a result of siting windows for Part M (accessibility) compliance.
- 4.15 Window locations - Proposed window locations are generally faithful to the principles of consented elevations wherever possible. Some small amount of variation to proposed positioning has been necessary due to siting windows conveniently to Part M compliance.
- 4.16 Apartment entrance doors - Have been enlarged slightly where possible to include a side glazed screen to the door. This undoubtedly serves to help clarify where the entrance door is to be found on the elevation but is also included with a view to improved visibility and Secure by Design compliance.
- 4.17 Stair windows - We are proposing larger windows to serve apartment communal stairwells than illustrated on the consented proposals. Stairwells to communal buildings are known to present as potentially frightening spaces for some people. We believe the windows as the consented drawings are unusually undersized for a communal stairwell. The risk is that the stairwell could be quite dark and 'private'. The larger windows help to promote Secure by Design principles of passive observation - both from within to out and vice versa to deter potential anti-social behaviour.
- 4.18 Additional brickwork openings to gable ends of Block A and B **had been proposed in the initial submission of this application. This resulted from an early discussion with Secure By Design Officer (towards meeting Condition 12 of the consent). A letter of invalidation of this initial application (received 15th August 2024) highlighted that this proposal contradicted condition 10 of the consent. As such, revised proposals as submitted omit these additional openings.**

Brick detailing

- 4.19 We wish to be clear that the omission of 'brick detailing' panels from the elevations of drawings as submitted for the Condition 3 application in no way reflected an intention to omit these.
- 4.20 North Elevations - It can be seen that drawings as submitted with this application clearly illustrate the brickwork relief panels to the north elevations that match those as the planning consented drawings. These aim to provide some scale and proportion to the development as viewed from properties to the north.
- 4.21 Block C - The brickwork detail panels to west, east and north elevations of Block C are illustrated in the locations as the consented proposals. This application includes proposals that avoid the clash between brickwork detail panels and balconies as illustrated to the western elevation of Block C on the consented drawings.
- 4.22 Block A and B gable ends - Consented drawings illustrate brickwork detail panels sited to the rear (northern) side of the west and east elevations of Block A and to the east elevation (only) of Block B. It can be seen that the drawings as submitted with this application propose to relocate the detail two detail panels in the space between Blocks A and B (west end of Block A and east end of block B) to the leading edge/'front' (southern) side of the gable end elevations. The reasons for this are;
- The array of detail panels to the northern elevations of Blocks A, B and C adequately improves the appearance of these blocks from properties to the north. The brickwork detail panels to the gable ends of Blocks A and B, have very limited additional presence/impact. Furthermore, in the narrow space between the blocks they also have little impact from the 'front' of the development.
 - Siting these detail panels to the 'front' side of Blocks A and B gable ends appears more consistent with the siting of the feature panels at the leading edge (southern/more publicly visible side) of Block C.
 - The re-sited feature panels are designed to work with the proposed new brickwork openings (as 4.18 above) for a more cohesive and ordered overall external appearance to the development.
- 4.23 The brick detail panel to the east gable end of Block A remains sited as the consented proposals as it is more clearly visible from longer distance.
- 4.24 A 'false' brickwork window is proposed to be added adjacent to the ground floor level eastern elevation of Block C. This is proposed in order to provide some relief to the otherwise significantly blank area of brickwork that is illustrated on consented proposals and that is highly visible at the end of the onsite pedestrian approach route.

Privacy Screens

- 4.25 It must be acknowledged that the elevation drawings as submitted for discharge of condition 3 indicated proposed siting of privacy screens that were at variance with the consented proposals. As indicated previously, the design team did not consider that the drawings as submitted were to be considered the final proposals. As a work in progress, the drawings did include some additional screening that we thought built on the principles that appeared to be established on the consented elevation drawings.
- 4.26 It should be noted therefore that, further to the advice that ... *'The plans show details for condition 28 (privacy screens to balconies) but condition 28 doesn't form part of the description of the proposal.'* there was no intention on our part to be applying for discharge of condition 28 at that stage.
- 4.27 It might be worth highlighting at this stage that that we interpret the requirement of condition 28 for 'details of privacy screening to be approved' relates to the technical specification of the screen construction - not the number and location that appears to already be scheduled out by condition 28.
- 4.28 However, in reviewing the consent, we note that there is an inconsistency between the required locations of privacy screens to be included as scheduled under condition 28, and those as illustrated on the consented drawings. Though this would appear to be an inconsistency in the planning consent itself (and we have attempted to gain guidance on resolving this from LB Havering Planning Officer prior to this application) we have assumed for the purposes of this application that;
- The consent requires privacy screens to be provided in accordance with the schedule as condition 28 **and not as illustrated on the consented drawings**.
 - Nevertheless, LB Havering would require an application to vary a condition to be include proposed variations to illustrated elevations as consented under condition 2.
- 4.29 For the purposes of aiming to achieve consent, **this application includes elevation drawings that illustrate privacy screens in accordance with the scheduled requirements of condition 28 of P0708.20 schedule.**

Roof Finishes and Submission of Roof Plan

- 4.30 Roof plans are included with this this submission for completeness.
- 4.31 Roof plans illustrating proposed roof finishes are to be included with the newly submitted application for discharge of Planning Condition 3.

External Materials

- 4.32 See paragraphs 4.1 - 4.4 for background to application for discharge of planning condition 3 (External Materials)
- 4.33 This application retains the considerable majority of the proposed materials as included in the consented plans. Fuller details of proposed materials will be submitted in a separate application for Discharge of Condition 3 to follow. However, the LB Havering Planning Officer email of 20th September highlighted a concern relating to the proposed cladding to third floor level of Block A.
- 4.34 Fibre-cement cladding panelling had been proposed for approval in the Condition 3 application after attempts to progress the technical design with the consented glass panelling cladding system (as the consented elevations) indicated that it was not a practical and affordable system to adopt for the intended purpose (External walling at high level to an apartment building) IE. Expensive and fragile with an inadequate thermal and acoustic performance unless supplemented by a secondary wall construction. The fire resisting test performance of the glass cladding was also not clearly compliant with requisite standards.
- 4.35 The applicant accepts the requirement for a higher quality material than the fibre cement proposal and a zinc cladding is to be proposed.
- 4.36 We would also highlight that it is proposed to adjust the external walling finish to third floor level, northern elevation of Block C to facing brickwork. Consented proposals illustrated glass cladding in this location that the applicant is seeking to remove for reasons as above.
- 4.37 We would also highlight a proposal to include a maintenance (only) door in this third floor level north facing elevation of Block C. This is proposed only for the purposes of promoting safe access for roof maintenance only as there is potential to provide this from the communal circulation space. This door will remain under the control of the management company only and will not allow access for residents to the terrace. The door will necessarily have a threshold that is raised above internal floor level (due to the additional height of roof finishes externally) and will only be suitable for maintenance access.
- 4.38 The proposed changes to the external materials of the consented scheme are indicatively incorporated into this application. Fuller detail will be illustrated on the application for discharge of Condition 3 to follow.

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5. Summary

- 5.1. This application to vary a condition has originated from an LB Havering Planning Officer recommendation as a necessity to resolve discrepancies between consented proposals and drawings as previously submitted for Discharge of Condition 3 (External Materials).
- 5.2. The considerable majority of the external materials as submitted in the application were proposed as a natural progression of the outline details as consented. There is some proposed variation to the cladding materials to third floor level external walls of Block A. This is encapsulated in this application and further detail will be included in the revised application to discharge Condition 3.
- 5.3. We have explained that drawings as submitted with the application were not considered to be materially relevant to the approval of proposed external materials and were still subject to considerable technical development. LB Havering have communicated their reasoning for not being able to approve illustrations of elevations that differ from the specifically consented information as scheduled under condition 2 of the Consent.
- 5.4. We have, however, explained the background to a proposal to vary the consented layouts - to ensure their compliance with planning policy, consent and other regulations. This had inevitably initiated some variation to fenestration proposals but we have sought to minimise these where possible.
- 5.5. Windows, privacy screens and brickwork detailing have been adjusted on the newly submitted drawings - as this application - to match wherever possible the outline detail as the consented elevations. Where we are confident that there is good reason to propose a variation (e.g. for regulatory compliance, security, accessibility, constructibility, cohesion of the design or other reasons) we continue to illustrate the variation for LB Havering consideration. We have explained in this document the reasoning behind those decisions.
- 5.6. This report seeks to comprehensively address all of the concerns raised by LB Havering Planning Officer in the email of 20th September 2023.
- 5.7. We hope that we have clearly communicated our reasoning behind the proposals as submitted and that LB Havering agree that they reflect not an intention to wilfully change the design as the consented proposals, but a carefully considered natural progression of the detail awaiting completion and in accordance with the intent of the consented proposals.
- 5.8. For clarity - in response to a query raised in the LB Havering Letter of Invalidation received 15th August 2024 - we confirm that this application seeks a variation **only to Condition 2 of the consent** as granted.

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Appendix A: Schedules of Accommodation Comparison

Apt. Ref:	Description	Schedule of Accommodation (As provided in support of original/consented application)	Gross Internal Area as drawn: Planning Consented drawings	Gross Internal Area as Proposed (Drawings submitted)
A-01	Wheelchair Adaptable dwelling: 2b/4p - Shared Ownership	77.0	76.5	87.6
A-02	Wheelchair Adaptable dwelling: 1b/2p - Shared Ownership	55.0	59.5	61.5
A-11	2b/4p - Private	70.0	71.4	73.6
A-12	2b/4p - Private	70.0	72.1	70.8
A-13	1b/2p - Shared Ownership	50.0	49.8	50.5
A-14	1b/2p - Private	50.0	45.8	52.1
A-21	2b/4p - Private	83.0	83.9	87.6
A-22	2b/4p - Private	83.0	83.5	86.0
A-23	1b/2p - Private	50.0	49.8	50.4
A-24	2b/4p - Private	83.0	82.2	89.8
A-25	2b/4p - Private	83.0	82.6	85.4
B-01	Wheelchair Adaptable dwelling: 1b/2p - Private	55.0	57.4	62.8
B-02	1b/2p - Private	50.0	50.8	52.4
B-11	2b/4p - Private	70.0	73.4	79.5
B-12	1b/4p - Private*	70.0*	50.6	50.7
B-13	1b/2p - Private	50.0	50.4	50.9
B-14	3b/6p - Private	96.0	96.1	99.5
B-21	2b/4p - Private	70.0	73.4	79.5
B-22	1b/4p - Private*	70.0*	50.6	50.7
B-23	1b/2p - Private	50.0	50.4	50.9
B-24	3b/6p - Private	96.0	96.1	99.5
C-01	2b/4p - Private	70.0	69.8	71.2
C-11	2b/4p - Private	70.0	69.8	71.2
C-12	1b/2p - Private	50.0	49.6	51.3
C-21	2b/4p - Private	70.0	69.8	71.2
C-22	1b/2p - Private	50.0	49.6	51.3
C-31	2b/4p - Private	70.0	69.8	71.2

NOTES:

70* = The schedule of accommodation as submitted with the planning application indicates that apartments B-12 and B-22 are 2 bedroom apartments. The approved drawings and Design and Access Statement confirm these apartments to be formed as 1-bed apartments.

49.6/49.8/69.8 = These apartment Gross Internal Areas (as drawn on planning consented drawings) fail to meet National Prescribed Minimum Space Standards relating to 1 bed/2 person (50m²) and 2 bed/4 person (70m²) apartment