

Address:	18 Vine Hill 15 - 29 Eyre Street Hill London EC1R 5DZ		No.1
Application Number(s):	2018/6016/P	Officer: Seonaid Carr	
Ward:	Holborn & Covent Garden		
Date Received:	07/12/2018		
Proposal: Erection of an 8 storey building comprising a 146 bed hotel (Class C1) with ancillary ground floor restaurant/cafe facilities (Class A3) and 9 flats (5 x 1 bed and 4 x 3 bed) (Class C3), excavation works to enlarge the lower ground floor level and create a lift pitt, following demolition of the existing rear annex and garages at 18 Vine Hill, together with refurbishment of 18 Vine Hill and the erection of a 3 storey extension to provide additional office accommodation (Class B1(a)), hard and soft landscaping and other associated works.			
Background Papers, Supporting Documents and Drawing Numbers:			
<p>Existing: 13548-A LXX 03 001 Rev A, 13548-A LXX 03 010 Rev A, 13548-A L-1 01 099, 13548-A L00 01 100, 13548-A LM0 01 101, 13548-A L01 01 102, 13548-A LM1 01 103, 13548-A L02 01 104, 13548-A LM2 01 105, 13548-A L03 01 106, 13548-A LXX 01 201, 13548-A LXX 01 202, 13548-A LXX 01 203, 13548-A LXX 01 301, 13548-A LXX 01 302.</p>			
<p>Demolition: 13548-A L-1 02 099, 13548-A L00 02 100, 13548-A LM0 01 101, 13548-A L01 02 102, 13548-A LM1 02 103, 13548-A L02 02 104, 13548-A LM2 02 105, 13548-A LXX 01 201, 13548-A LXX 01 202, 13548-A LXX 01 203, 13548-A LXX 02 301, 13548-A LXX 02 302</p>			
<p>Proposed: 13548-A LLG 00 099 Rev A, 13548-A LUG 00 100 Rev A, 13548-A L01 00 101 Rev B, 13548-A L02 00 102 Rev B, 13548-A L03 00 103 Rev B, 13548-A L04 00 104 Rev C, 13548-A L05 00 105 Rev B, 13548-A L06 00 106 Rev B, 13548-A L07 00 107 Rev B, 13548-A LRF 00 110, 13548-A LXX 04 101 Rev A, 13548-A LXX 04 102 Rev A, 13548-A LXX 04 104 Rev A, 13548-A LXX 04 105 Rev A, 13548-A LXX 05 101 Rev A, 13548-A LXX 05 102 Rev A, 13548-A LXX 04 103 Rev A, 13548-A LXX 04 105 Rev A(Proposed West Elevation Hotel and Affordable Block, 13548-A LXX 04 105 Rev B(Proposed Section E-E) and 13548-A LXX 04 106 Rev A.</p>			
<p>Documents: Energy Strategy Report by Applied Energy dated 25 June 2019, Affordable Housing Energy Strategy Report by Applied Energy dated 10 May 2019, Flood Risk and Drainage Strategy Report by Heyne Tillett Steel dated November 2018, Sustainability Statement by eight associates dated 07 May 2019, Planning Statement DP9 dated November 2018, Design and Access Statement by Piercy & Company dated November 2018, Townscape, Visual Impact and Heritage Assessment by Peter Stewart Consultancy dated November 2018, Construction Management Plan by Blue Sky Building dated October 2018, Travel Plan by rgp dated November 2018, Transport Assessment by rgp dated November 2018, Daylight and Sunlight Report by Point 2 Surveyors Ltd dated November 2018, Excavation Method Statement Rev B by Heyne</p>			

Tillett Steel dated 7 November 2018, Structural Survey by Heyne Tillett Steel Rev B dated 6 November 2018, Financial Viability Assessment by DS2 dated November 2018, Statement of Community Involvement by Kanda dated November 2018, Noise Impact Assessment by Scotch Partners dated 9 November 2018, Hotel Demand Assessment by White Bridge dated November 2018, Delivery and Servicing Management Plan by rpg dated November 2018, Archaeological Desk Based Assessment by Mola dated November 2018 and Air Quality Assessment by Eight Associates dated November 2018.

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 legal agreement

Applicant:	Agent:
. C/O Agent	DP9 Ltd 100 Pall Mall SW1Y 5NQ

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	B1a Business - Office		2,310
	Garage and outbuildings (Sui Generis)		114
	Vacant Car Park Site		606.5
	<i>TOTAL</i>		<i>3,030.5</i>
Proposed	C1 Hotel		3,634
	C3 Residential		1,180
	B1a Business - Office		2,310
	<i>TOTAL</i>		<i>7,124</i>

Residential Use Details:						
	Residential Type	No. of Bedrooms per Unit				
		1	2	3	4	Total
Intermediate rent	Flat	5				5
Social rent	Flat			4		4
TOTAL - All	Flats	5		4		9

OFFICERS' REPORT

Reason for Referral to Committee: Major development involving the construction of more than 1000 sq. metres of non-residential floorspace [clause 3(i)]; and which is subject to the completion of a Section 106 legal agreement for matters which the Director of Culture and Environment does not have delegated authority [clause 3(iv)]

1 EXECUTIVE SUMMARY

- 1.1 The application is for a mixed use development within a highly accessible part of the Borough, located north of Clerkenwell Road within the Holborn and Covent Garden Ward and sited within the Hatton Garden Conservation Area, but outside of the designated jewellery area.
- 1.2 The proposals would refurbish and alter an existing building, The Ragged School, which is considered to make a positive contribution to the Conservation Area to bring it up to modern office standard. The proposal also includes a new building to the Eyre Street Hill side of the site within an existing car park which is identified for potential development within the Conservation Area Statement. It would comprise a mixed use development of office, hotel and residential uses.
- 1.3 The development would provide 9 new residential units, all of which would be affordable, 4 x 3 bed social rented and 5 x 1 bed intermediate rent, it would also secure a payment in lieu of market housing of £1,095,500.
- 1.4 In terms of design, this is a well-considered scheme which has responded positively to the pre-application process which included both meetings with officers and input from Camden's Design Review Panel. The building would be of a larger scale than its direct neighbours however when looking to the wider townscape it is considered to be of an appropriate scale and would not cause harm to the Conservation Area within which it is located.
- 1.5 In accordance with Policy G1, this development is considered to optimise the site, taking into account the context, sustainability, amenity, transport and heritage and would secure some public benefits for the borough. It is therefore recommended for approval subject to conditions and Section 106 legal agreement.

2 SITE

- 2.1 The site is located between Vine Hill and Eyre Street Hill to the north of Clerkenwell Road. The site comprises the former Ragged School building located on the east side of Vine Hill and its associated car park located on and accessed from the west side of Eyre Street Hill. The Ragged School is not listed but does form an element of the Hatton Garden Conservation Area, and is considered to make a positive contribution to its character and appearance. The car park site is identified within the Conservation Area Appraisal and Management Plan as a potential development site. The site is within close proximity to the London Borough of Islington with the Borough boundary running along Warner Street to the north of the site.



Figure 1 – The existing site

- 2.2 The Ragged School building currently provides 2,310sqm of B1(a) office accommodation, it is vacant at present and has been since the applicant acquired the site in November 2018. The car park area is not currently actively used for car parking and is gated. It accommodates a single storey garage. When the Ragged School building was under its previous ownership it is understood this was a private car park.
- 2.3 The topography of the area is unusually hilly for central London. This distinctive topography is due to the presence of the valley of the former River Fleet, aligned roughly with present-day Farringdon Road. The steep streets on the valley slopes include Herbal Hill, Eyre Street Hill, Back Hill and Vine Hill which all run downhill from Clerkenwell Road to the former river tributary.
- 2.4 With regard to surrounding buildings, to the opposite side of Eyre Street Hill is the Back Hill Substation and to the corner of Eyre Street Hill and Summers Street is 1-10 Summers Street which is commercial to the ground floor and residential above. To the south of the site on Eyre Street Hill is the Gunmakers Arms and to the north is a building in use as light industrial workshops.
- 2.5 The southern end of the Ragged School building addresses the curve in Vine Hill to have an elevation facing south and another west, both onto Vine Hill. Neighbouring the Ragged School to the south is No.16 Vine Hill which is a

residential building comprised of 4 flats. To the west of the Ragged School is an alleyway, beyond which is a commercial building which is one full storey above ground level. Behind the commercial building is the residential units which form Rosebery Square.

- 2.6 The site has a Public Transport Accessibility Level (PTAL) rating of 6b, which is the highest PTAL level, demonstrating the site had excellent access to public transport. The site is located close to Farringdon Station and is served by multiple bus services along Clerkenwell Road, Farringdon Road and Rosebury Avenue.

3 THE PROPOSAL

- 3.1 The proposed development of the site would comprise of 3 different land uses; office, residential and hotel. As noted above the site includes the Ragged School building which has a lawful use of office. The existing building has a floor area of 2,310sqm. The proposal includes the demolition of the three storey rear extension on the building's east elevation and the erection of a new 3 storey extension to the north west corner of the building. The works to the Ragged School building would include making good the eastern façade where the extension will be removed including reinstating windows. There will also be a new entrance created to the Vine Hill elevation of the building to provide level access. Internally the office accommodation will be refurbished.
- 3.2 To the eastern side of the site, where there is an existing car park it is proposed to build an 8 storey building which would be stepped in height to provide a 146 bed hotel together with 9 residential flats, all of which would be affordable homes (4 x 3 bed(social rent) and 5 x 1 bed(intermediate rent)).
- 3.3 The residential element of the building would be sited to the northern end of the site and would have 7 full storeys with the 8th storey set in from the lower floors. This element of the building would have a different design to the hotel, constructed in brick with metal framed windows. The building would have its own entrance fronting Eyre Street Hill. The general arrangement of the floorplates is one unit per floor on the first to fourth floor to accommodate the 3 bed units and then 2 units per floor on the 5th and 6th floor with 1 unit on the 7th floor. Each unit would have its own private balcony and the 7th floor would also accommodate a communal amenity space for all residents to use. Cycle and waste storage would be provided at ground floor level accessed via a separate entrance adjacent to the main entrance on Eyre Street.
- 3.4 The hotel section of the building would have 8 full storeys constructed in a light pre cast concrete to first floor and above, the ground floor of the building would be a dark pre cast concrete. The building would have a recessed entrance to its northern end with three picture windows on the remaining Eyre Street elevation. The building will be set in from the southern boundary of the site. Given the topography of the site at the southern end, there is a level change between Eyre Street and the lower ground floor of the site and therefore it is necessary to install railings along this element of Eyre Street Hill. At the lower ground floor level this set back enables the creation of a courtyard terrace at

lower ground floor level and views of the turret of the Ragged School are retained from Eyre Street Hill and Summers Street.

- 3.5 Internally the hotel will provide a bar/restaurant area at lower and upper ground floor levels together with the back of house rooms such as kitchen, linen room, storage, staff facilities and hotel rooms on the first to 7th floors. The roof of the hotel would accommodate a plant enclosure and PV panels.
- 3.6 It is proposed to landscape the area between the two buildings to provide some outdoor space for the bar/restaurant area of the hotel and the residents, the space will also be accessible by office users. There will also be a terrace to the new extension of the Ragged School for the office users.

Revisions during the application

- 3.7 During the course of the application the following amendments have been sought:
- Amendment to the mix of social rented units from 3 x 3 bed and 2 x 1 bed to 4 x 3 bed.
 - Reduction in height of the building from 30.6m to 29.75m.
 - Number of hotel rooms reduced from 153 to 146.

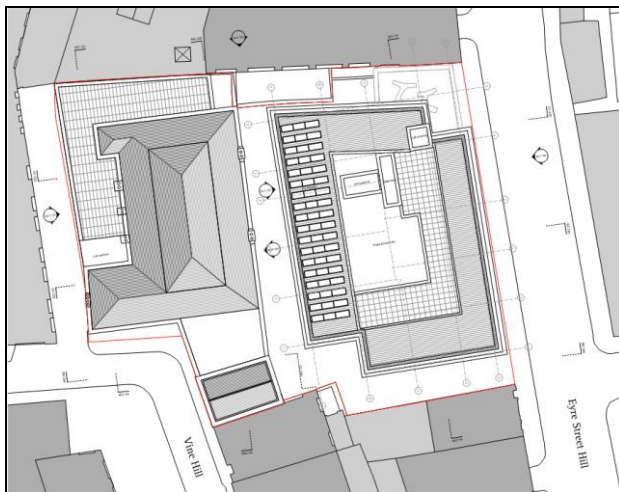


Figure 2 – The proposed site

4 RELEVANT HISTORY

The site

- 4.1 There have been no relevant previous planning applications submitted on the site in recent years. Officers have been in pre-application discussions with the current applicant since May 2018. This has included a series of meeting, presentation at two Design Review Panels together with internal discussions and briefings with the relevant officers.

Design Review Panel (DRP)

- 4.2 The proposals were initially presented to the Camden DRP on 3rd August 2018, a summary of the panels comments are below:

- While the proposed refurbishment of the Ragged School is of a high quality and the new hotel represents a suitable use for the site, the height and massing of the hotel block should be adjusted to reduce its impact on the setting.
- The Conservation Area is characterised by varied building heights, but the tall north flank wall creates a sudden transition, and dominates views from Warner Street. The scale and relative lack of articulation in this flank wall, which will be the most visible element should be addressed.
- Analysis of daylighting and overlooking would also be helpful to determine the proximity and scale of the hotel in relation to No.31 Eyre Street Hill.
- The panel supports plans to relocate the plant from the roof and create accessible spaces instead.
- While the success of the proposed glimpse of the Ragged School tower from Eyre Street Hill is a matter of opinion, it will be worth exploring whether a complete view of the tower is a more successful option.
- The panel supports the refurbishment of the Ragged School, and is convinced it will be of high quality.
- In terms of architectural expression, the panel appreciates the quality and depth of the proposed elevations. It suggests further consideration of the balance between glazed and solid elements; whether more verticality would respond better to the context; and the extent to which the front façade should 'wrap' around the corners.
- The dark materials at ground floor level provide a base that anchors the building well, and relates it to The Gunmakers pub.
- The panel thinks the affordable housing entrance should be more distinctive and welcoming. Smaller plot sizes and clear distinctions between land uses are characteristic of the area. The panel considered separation of the two uses should be explored.
- The courtyard spaces are likely to be inviting but inaccessible from Eyre Street Hill, so further thought could be given to the way they relate to the street and The Gunmakers pub.
- Internal courtyard should also include amenity and play space for residents.
- It would be beneficial to see a more detailed study of how the Ragged School doors opening on to Vine Hill will be treated, and how they will relate to the heritage façade. The panel also encouraged further investigation of a sustainability strategy for the development.

4.3 Following the initial DRP, the applicant in discussion with officers amended the scheme, it was then presented to a Chair's Review Meeting of the Camden DRP on 14th September 2018. A summary of the panels comments are below:

- While the proposed designs are of a high quality, the hotel and residential building should be reduced both in height and bulk to ensure its impact on the conservation area is acceptable.

- In other respects, the revised designs respond positively to issues raised by the panel at its previous review meeting. However both elements of the new building remain one storey too high and will have a negative impact on the neighbouring buildings to the north and west on the local townscape.
- The panel feels the hotel and residential building extends too far towards the site boundaries on the north and west sides. Hotel rooms are close to the Ragged School offices. The residential accommodation is close to the neighbouring building to the north, and the panel is not convinced that daylight levels for the first floor flats will be acceptable.
- Reducing the quantum of accommodation would create an opportunity to improve daylight, reduce overlooking and improve the quality of external spaces.
- As part of the process the lack of amenity space for family flats should be addressed.
- The panel would encourage further exploration of the detailing of the residential elevations to ensure these are of the same high quality as the hotel.
- The spaces behind the hotel and residential building should also be of the same quality as the public courtyard, and a hotel servicing strategy is needed to avoid adverse impact on residents.
- Stairs should be considered to connect the courtyard space beside The Gunmakers Pub.
- The partial view of the school from Eyre Street Hill, a positive element of the design, will require precision to ensure it works as intended.
- The site is sensitive and requires great care to deliver a development of appropriate quality.
- The panel supports the architectural approach taken by the design team, and feels it is essential that the current architects are retained to ensure the building is delivered to the standards promised. However the panel highlights that the quality of material and detail cannot compensate for excessive bulk and height.

5 CONSULTATION SUMMARY

STATUTORY

5.1 London Borough of Islington

- No comments received

5.2 Thames Water

- No objection subject to conditions and informatives regarding connections into the existing water network, piling and SUDs

Officer's response:

- The points above will be secured via condition and informatives will be included to advise the applicant of who to contact in Thames Water to discuss.

Local groups/stakeholders

5.3 Mount Pleasant Neighbourhood Forum

- The consultation period was badly handled, we are legally designated Neighbourhood Area, which includes Eyre Hill Street and we should have been consulted within the original consultation period.
- The central mass of the proposed building is too high (8 storeys plus rooftop plant), even though the developers seem to think building it at the bottom of a hill disguises its height. The height is disproportionate to its surroundings. Resulting in lack of direct light, lack of amenity and intrusion of privacy. Paying agreed compensation is no substitute for these losses.
- The Poor School building itself is of some architectural merit, as is the c19 warehouse; they may not be listed, but they make up the varied grain and texture of this townscape, which through its accumulated history is varied, (mixed residential/light industrial,) and is predominantly part of a historic quarter. Whilst we have no objection to adding good modern design into this mix, this particular proposal has no architectural merit we can observe. It is a commercial design which lowers the standards of this area, and we oppose it.
- The proposed occupancy rate seems excessively high - very many very small rooms. It did occur to us that whilst a high profile boutique hotel sounds very attractive to investors, this proposal could also double - up/convert to student accommodation. So, whilst both land uses would be permitted under planning law, both of these potential uses involve potentially detrimental changes to local life, to which local residents object.
- This proposal for a mini-hotel (in reality a large building one with lots of very small rooms) we object to the effect the proposal will have on traffic.
- Camden and Islington are both amending their traffic flow plans as we discuss this issue. Both Councils have also issued Traffic Strategy documents. The general thrust of both Council strategies is (amongst other worthy aims) to diminish vehicular traffic in side streets. This proposed commercial development will, they say, need service vehicles and transport buses/links 24/7. This seems against both Council's traffic policies.
- The proposal seems to indicate a low service vehicle use and we do not believe their estimates - unless the "hotel" proposed is in reality just a cheap lodging house . We think they will need much more laundry, services, food suppliers than they say - and this will seriously affect such traffic flow as is permitted in these old and narrow streets.
- The undoubted increase in traffic to this new building will adversely affect the everyday lives of existing residents and businesses, but will bring no benefits that we can see.
- In principal we welcome new commercial enterprises. However this particular proposal has few, if any merits. It will intrude in the historic landscape, it will interfere with local residents' light and space, it will adversely affect the troublesome traffic flow and add congestion to old and narrow streets. The proposed design itself has little merit, compared

with its surroundings and the proposed accommodation itself seems remarkably minimal - and not in a good way.

- The proposed give the impression of a cheap back-street scheme disguised as a 'trendy' venue, purely design to make money whilst giving nothing back to the community.
- We would remind the planning authorities to consider the wider built environment. We have already seen the redesign of the former Guardian building on Farringdon Road, the redevelopment of the NCP car park off Pine Street into a proposed Premier Inn, the proposals that come and go to make the ex-Fire Station on Rosebery Avenue into an hotel.
- The forum finds nothing to support in this proposal.

Officer's response:

- With regard to the consultation period, the Neighbourhood Forum do not become a statutory consultee until the draft Neighbourhood Plan has been through examination, the Mount Pleasant Neighbourhood Plan has been through an initial independent examination but the plan did not meet all the statutory requirements and therefore did not proceed to referendum. However the Forum were sent a consultation notification with 21 days to comment.
- Should the applicant wish to change the use of the hotel building to student accommodation this would require a further application of planning permission as they are different use classes.
- Land use concerns, see section 8 Land use principles.
- Design concerns, see section 12 Conservation and Design.
- Amenity concerns, see section 14 Impact on neighbouring amenity.
- Transport concerns, see section 19 Transport.

5.4 Bloomsbury CAAC

- We object on grounds that it is far too tall, nothing comparable in height in this area of low-rise commercial uses. The generic modernism of the design is out of keeping with the 'warehouse' feel of the area and there is the opportunity to design in a 'warehouse style' to reflect and blend with the good block at 3-11 Eyre Street Hill. The proposal would therefore be very damaging to the setting and neither preserve or enhance.

Officer's response:

- See section 12 Conservation and Design

5.5 Summer's Street Residents Association

- We object to the building proposed on Eyre Street Hill in its present form. It is 8 storeys plus a plant floor, effectively 9 storeys from street level. This is taller than any surrounding building, the west elevation drawing shows the Gunmakers overtopped by 5+1 storeys and the edge of 3-11 Eyre Street Hill and behind that 1-10 Summers Street with the curved roof.
- The Hatton Garden Conservation Area Appraisal and Strategy(HGCAAS) objective is to protect the 'essence of place'. Para 9.9 sets out how this is to be done, specifically that an appropriate height for any new buildings is 3-6 storeys, roof lines, building lines and bay rhythm are important considerations. The proposal does not comply with the requirements. Any

reference to the 3-6 storey restriction is notably absent from any of the application documents though there are signs of nervousness about its height.

- The East elevation of Eyre Street Hill landscape shows no correlation between the local roof lines and the top of the proposed hotel.
- Whilst the fenestration of the affordable housing is pleasingly simple, the hotel façade bears no relation to any bay width or rhythm of neighbouring buildings.
- Some existing buildings within the area have been increased by roof additions, inevitably set back from the façade to reduce visual impact. A new tall building is a totally different animal as it completely changes the streetscape. A new building should therefore be measured very closely to the HGCAAS criteria.
- The HGCAAS identified the Ragged School as a local landmark and the view of it along Summers Street is a 'locally significant view'. The hotel overtops the roof line of the Ragged School by 2 storeys and plant so that only half of the tower, instead of all the tower and interesting main roof will be visible in the Summers Street view line. It is disrespectful to the Ragged School and its place in the local landscape. Contrary to the Planning Statement and TVIHA this obscuring of the view cannot be said to enhance the view.
- Hotel is not reminiscent in proportion and size of historic Clerkenwell buildings, nor is it a welcome or potentially valued addition to the streetscape for local residents.
- Should this be allowed you are tearing up the HGCAAS and sanctioning the potential destruction of the Conservation Area for developers economic gain. Whereas adoption of the strategy has shown that Camden has wider values than that.
- Concerns of loss of light to 1-10 Summers Street and overlooking to 3-11 Eyre Street Hill. Has a model of the proposal and surroundings buildings been requested. At the very least, the planning committee should visit the site and use their powers of visualisation.
- Hotel use will increase noise and traffic in the area which is primarily residential and office. Is this appropriate in this residential area. Has the needs assessment taken account of the recently reported fall in the number of tourists in the past year.
- The applicant does not seem aware of the Camden scheme that will close the junction of Eyre Street Hill and Farringdon Road to vehicles and route them along Summers Street and Back Hill. This will mean construction HGVs, delivery and service vehicles take a longer route and pass more of our building. During of construction will be a nightmare.
- Eyre Street Hill will have an increased cycle use when the proposed two-way cycling is allowed, there should be an assessment of impact on it to comply with NPPF.
- It is suggested that 33 jobs will be created from the hotel but an officer would accommodate a much greater number. The provision of affordable housing is good, but if the economics of running a hotel in a building of an appropriate size whilst keeping affordable housing does not add up, that should not be a reason to allow an overlarge building. The Financial

Viability documents seems to indicate that the capital value resides heavily in the refurbished Ragged School with lettable car park and that changing use adds a minima increase. There should be scope to reassess the change of use of the car park to a more suitable building without economic loss to development and without detriment to the Conservation Area and residents.

- The application should be refused. This building is grossly oversized in this location.

Officer's response:

- Land use concerns, see section 8 Land use principles.
- Design concerns, see section 12 Conservation and Design.
- Amenity concerns, see section 14 Impact on neighbouring amenity.
- Transport concerns, see section 19 Transport.

5.6 UK Power Networks

- It is evident the proposed development would have a meaningful impact on the long-term development potential of the nearby Back Hill Substation. We acknowledge that the development will cause a substantial interference and substantial deprivation of light to the Substation site if implemented. In the event that planning permission is granted, we hereby express out legal entitlement without any limitation or implied abandonment of any right.

Officer's response:

- With regard to loss of light, it is only the loss to residential properties that is considered as part of Policy A1. The currently building is a sub station and therefore the levels of light received into this are not a material planning consideration. Other issues raised in respect of UKPNs legal entitlement is a matter between the applicant and UKPN and not a matter for determination of this planning permission.

Adjoining Occupiers

5.7A site notice was displayed from the 4th of January expiring on the 28th of January 2019. A press advert was placed on 10th January 2019 in the Camden New Journal.

Representations summary

Letters and petitions of objection

5.843 42 objections were raised on the issues outlined below from residents within Summer Street, Warner Street and Vine Hill. These issues raised are considered in the relevant section of this report.

Principle of development

- Whilst we support new development in principle and recognise the value that a well-designed new addition can bring to the life in the city, this proposed development would seriously reduce our quality of life as local residents.

- I understand the important of providing affordable housing in this area, but trust that Camden planning department will not be persuaded by the developer's promises on this score to overlook the multiple drawbacks and lasting damage which would be caused by allowing the proposed application.
- The planning process should be about reinforcing the sense of community for residents not the acceptance of atomised commercial projects; aiming for the creation of a somewhere rather than an anywhere. Since the hotel is too big and in the wrong place the planning application should be summarily rejected. It should be possible to deliver some affordable homes on the vacant site through the development of a much more compatibly sized building containing a mixture of residences and offices/workshops.

Officer's response:

- Land use concerns, see section 8 Land use principles.
- Amenity concerns, see section 14 Impact on neighbouring amenity.

Land Use

- Concern that having obtained planning consent, in the event of a deal not materialising with an operator, the developer will seek a change of use to for example student accommodation. Given there are several residential blocks within 50m of the site, this would be completely unacceptable.
- We were misled at the open consultation meeting, we were reassured the hotel management would be a high-end chain. Besides the general small size of the rooms, there are four rooms per floor without any windows or daylight. Which high-end visitor would enjoy spending a week in a tiny room.
- Floors that provide windowless bedrooms is not the answer to the city's shortage of housing or tourist accommodation. Bedrooms without any natural daylight should not be acceptable. Environmentally the rooms will use more energy as they will always require artificial lighting and always require air ventilation.
- I do not feel it appropriate to build a hotel in what is a largely residential area, with some offices. As residents we already suffer regular noise disturbance from the Gunmakers pub.
- Why not give permission for an office or partly office partly residential building, rather than a hotel.
- Hotel use is inappropriate in this area.

Officer's response:

- Should the applicant want to change the use of the proposed hotel building to student accommodation this would require a further application for planning permission as student accommodation is within a different use class to a hotel.
- In terms of the end user of the hotel, it is not for the planning permission to restrict the end user of the use.
- The hotel would include some internal rooms without windows, however there are no amenity standards for hotels and it is the minority of rooms that are internal.
- Land use concerns, see section 8 Land use principles.

- Amenity concerns, see section 14 Impact on neighbouring amenity.

Design and conservation

Height

- Building is too large and too high for the street and totally out of scale with the other buildings on Eyre Street Hill and does not comply with the conservation area criteria. In my view would negatively effect the neighbourhood.
- There is currently a mix of old and new, high and low rise buildings and the balance should be maintained.
- I am concerned the height is entirely out of keeping and proportion with the surroundings and will overpower the area including several residential blocks, and local public house. From Warner House we will lose the architecturally interesting and historic roofline of the old Ragged School and gain a soulless block of concrete which will change the skyline completely.
- 40% of respondents in the community consultation also objected to height. It is totally incongruent with the criteria of the Hatton Garden Conservation Area. Planning decisions should be made on basis of compatibility with the local environment and not how many beds a hotel needs to make it viable.
- Most of the surrounding buildings are 3-4 storeys above ground. The contrast between the proposed and existing is most evident in the elevations. The proposed height and massing of the new building will dramatically exceed any of the nearby existing structures and significantly degrade the current cityscape.

Impact on Conservation Area

- The Ragged School is a local landmark and a reminder of what a poor area Clerkenwell was. There are views of it along Summer Street and Eyre Street Hill as well as along Warner Street and the lower end of Bakers Row. The application dwells on how the overall height of the building fits within the area but completely discounts the fact that it is situated at the bottom of the Fleet Valley.
- It will tower over every other building and set a precedent for future developments. Eyre Street Hill encapsulates the history of this corner of Clerkenwell. The three buildings at the bottom of the street are what remains of the Georgian part of the Warner Estate.
- I hope that Camden will look to abide by its own guidelines intended to maintain the character of the historic Hatton Garden area.
- The proposed development will harm the heritage of the area. It will be more than twice as high as the Chiappa building and will obscure views of the Ragged School from Eyre Street Hill leaving just a glimpse of the tower. Views of the school from Eyre Street Hill, Warner Street and Bakers row will be destroyed.
- Although residents of Islington, we would expect Camden's planning department to protect both the Conservation Area and our communities, encouraging positive development whilst ensuring that outstanding design is achieved. It is clear the current development has no interest in the

history of this area nor of its current character otherwise they would not be proposing such an ill-conceived scheme as running a high density hotel in this location.

- The references of buildings cited by the architect have ignored the Ragged School and talk about buildings in an entirely different part of Clerkenwell, how can this be allowed. It ignores benefits of the site and current building on that site.
- This is Charles Dickens Ragged School building as referred in Oliver Twist and it is therefore an important part of our cultural and literary heritage. I suggest the Council must seek advice from the Charles Dickens museum at Doughty Street and the Dickens Fellowship. Please do not grant this planning permission.
- My office is located on Eyre Street Hill. I am astonished that this is not a listed building, or being treated as one. The audacity of the developer. Please turn down this application.

Detailed Design

- It is a very unaesthetic proposal, surely our Central London neighbourhood with its many very attractive buildings deserves better.
- It in no way mirrors or refers to warehouse buildings in the area as claimed. These were built using available materials and technology to admit the maximum amount of light.
- It is finished in ugly grey concrete, other buildings in the area are predominantly brick.
- The façade of the development exactly mirrors, on a monstrous scale, the mean and pinched dimensions of what is on offer inside, which is tiny rooms, some with no outside windows, that are barley bigger than the beds they will contain.
- While the surrounding buildings offer a rich variety of styles and materials the proposed development consists of featureless cliff of aggregate panels and blank windows.
- The application does not seem to add to the community and the mix of four architectural styles looks a soulless mess that would be a blight on an otherwise attractive neighbourhood.
- The new building makes some attempt to match the colour and horizontal or vertical lines of existing structures but is too massive.

General Design Objections

- There is no doubt the site needs to be developed but surely the area and the Ragged School deserve better. There are examples around the area of where less greedy developers have either replaced or renovated redundant buildings in a way that complements and enhances the area.
- I am very concerned that the proposed design will add nothing to the neighbourhood and on the contrary will be a soulless addition that will cause irreversible damage and breakdown to this historic and residential area.
- If the development is to be allowed please can it be redesigned to benefit the local area and not be a carbuncle that is the current design.

- Visual appearance of the proposal is not in keeping with the other properties in the immediate neighbourhood.
- Eyre Street Hill is narrow and the building bears no relationship to the streetscape.
- The proposed hotel, by its overpowering monolithic size and the 24/7 noisy activity it will engender, will undo the progressive evolution of the surrounding area. It is a meretricious, mercantile project that takes no account of the local environment, presented as a vector to deliver a handful of affordable homes. It is a place-destroying structure, its dominance and self-assertion destroying a sense of place that belongs to the community and to which the community belongs. It would stand out like a sore thumb and undermine many years of constructive planning.
- Any change of use from a car park should only be allowed to a building complying with the Conservation Area criteria. Provision of high quality jobs and capital value could be achieved from an office/mixed housing development.

Officer's response:

- Design concerns, see section 12 Conservation and Design.

Amenity impact

- Customers of the new building are likely to increase noise and anti social behaviour in the area. We already suffer greatly with much increased noise levels from the recently redeveloped Coach pub.
- The proposed height and massing would restrict the daylight into Flat A 16 Vine Hill far below minimum values considered liveable. If consented our apartment will literally become uninhabitable. The values in the daylight and sunlight report are clearly all in excess of the permissible losses. I request the height and massing of the proposed development be adjusted, and daylighting re-tested to ensure the effect of the proposal is within the maximum acceptable limits.
- The quiet largely residential area will be ruined by the 24-hour nature of a hotel.
- Building will overshadow flats at Warner House and affect the light reaching the terraces.
- If the hotel fails it may become a hostel or student accommodation with potential anti social problems of noise in a residential area.
- In recent years the area have seen significant changes which only recently have yielded benefits of reduced traffic and noise, this scheme threatens to compromise those improvements.
- Loss of light into many windows of 24 Warner Street, 1-10 Summers Street and 16 Vine Hill, some greater than BRE limits.
- Overlooking into all surrounding buildings.
- Unsuitability of a 153 bed hotel operating 24/7 in a residential area.
- The plans do not acknowledge the existence of our nearby residential flats at 24-28 Warner Street. How can the effect on our light have been assessed.

Officer's response:

- Concerns of impact of hotel on amenity, see section 8 Land use principles.
- Amenity concerns, see section 14 Impact on neighbouring amenity.

Transport

- The new building with use as a hotel and restaurant would be serviced by two vehicle movements per day which does not seem feasible. The coach pub on the opposite corner has several deliveries of various supplies throughout the day. It is most likely even more given it will be a hotel with restaurant and bar.
- It seems unrealistic for these small street to be able to accommodate such increased service traffic. Increased traffic can potentially lead to dangerous road situations, in addition to additional noise and pollution.
- The development will bring greater traffic to a highly restricted area with poor road access and as Warner Street which alongside the proposed development is now a Cycle Quietway, is this a responsible thing to do?
- It is not possible for commercial vehicles to turn into Eyre Street Hill from Clerkenwell Road.
- Additional traffic pollution as well and increasing danger to cyclists on Warner Street.
- Impediment to access for essential vehicles, especially for the fire brigade and other emergency services.
- Neighbouring residents had to pay for a private refuse collection when Camden's collectors were unable to get down the street to the bin store, the proposed development makes this issues more likely to recur.
- The application doesn't address the impact on the proposed changes in traffic flows in the area related to the cycle superhighway.
- Taxi movements will be in excess of what the area's streets can take.

Officer's response:

- Transport concerns, see section 19 Transport.

Building works

- During construction the traffic situation on surrounding streets would considerably worsen. These are small street recently narrowed with a cycle super highway running through Warren Street and recently changes traffic directions, I cannot see how construction traffic could be successfully integrated without traffic buildups and potentially dangerous traffic situations.
- The transport report doesn't make much, if any, mention of traffic generated by hotel guests. As with construction traffic, traffic will have to come to site via Back Hill and Summer Street and exit via the cycle highway. This will put traffic into an area where millions have been spent in reconfiguring traffic flows and junctions to reduce traffic.
- Traffic safety both during and after construction is a huge concern for me, especially living in the area with children.
- Construction of such a large building would yet again increase pollution levels.

- The section in the application regarding construction traffic is out of date, it is now prohibited for motor vehicles in both direction at Clerkenwell Road end of Eyre Street Hill, the lower half continues to be one way northbound. This means the construction traffic will either have to ignore the restrictions or enter the site by going down Back Hill, along Summers Street and then on to Eyre Street Hill. The traffic will then continue down Eyre Street and turn onto Warner Street.
- Drivers will be keen to avoid the traffic light at Rosebury Avenue/Farringdon Road junction so are likely to try to turn acutely right on Warner Street and then acutely right on Bakers Road.
- Given the whole area has been reconfigured as a cycle quiet way it seems lunacy to allow heavy construction traffic, which is proven very hazardous to cyclists into this area. There is also an issue of considerable disturbance to the residents of Summer Street, Warner House and 24 Warner Street.
- The demolition of the rear annex of 18 Vine Hill, which shares a party wall with the living room and kitchen of Flat A, 16 Vine Hill. Extreme noise and vibration is likely during the works which will cause serious disturbance and I consider there to be a risk of damage within the flat.
- I request the application submit a more detailed site management plan further explaining the nature of the works to the rear annex including an assessment of party wall considerations, foundation design, risk of undermining the neighbouring property structure, noise and vibration control for the full duration of the works.
- Site wide excavation will be required, I request further details of the excavation methodology around the party wall of the living room and courtyard of our flat.
- The applicants excavation method statement notes the structural design and foundation or ground slab design of neighbouring building but not 16 Vine Hill, I request the applicant illustrate the proposed structure foundation design in relation to 16 Vine Hill.
- Access to the site will mean large articulated trucks will have to reverse up Eyre Street Hill from Warner Street as the top end is now closed.
- Vehicles waiting to access the site will block up surrounding roads, contributing to air pollution.

Officer's response:

- Transport concerns, see section 19 Transport.
- Pollution concerns, see section 15 Air Quality
- With regard to the concern raised regarding the demolition of the rear extension to 18 Vine Hill, the rear extension does not directly adjoin the party wall with No.16 Vine Hill it is only adjoining the rear elevation of No.18 Vine Hill. The issue of damage to neighbouring properties as a result of demolition of a rear extension if they share a party wall is a civil matter between neighbouring land owners.
- The development is not proposing excavation works other than to create a lift pit.

Procedural concerns

- It is a concern the Mount Pleasant Neighbourhood Forum was not informed of these plans.
- The applicants Design and Access Statement states that neighbours were notified of the development prior to 18/10/18. We moved into 16 Vine Hill 01/11/18 and as such did not receive any notification about the development. No site notice has been erected on the development address at Vine Hill or Eyre Street Hill and we were unaware of the proposal throughout the consultation period.
- For there to be no community engagement for almost 6 months, no visible public notice, is not within the spirit of public involvement the Design and Access Statement claims to promote. The fact we have only now discovered the proposal by chance at this late stage limits our ability to participate meaningfully in the planning process.
- The height of the building is greater than 30m and subject to the requirements of the London Plan Policy D8 – Tall Buildings, which requires all building over 30m tall to be submitted to the GLA for review. I request the building be submitted to the GLA and assessed as a tall building.
- This development has been hastened through I believe to avoid scrutiny from local residents as it fails on many levels to satisfy the basic requirements to positively contribute to the local area. The developer will not have to live with the legacy of this poor development and we need to reply upon Camden Council to police new development in a responsible manner.
- The consultation process has been seriously lacking, I live less than 100 yards from the site, but because I'm in a different borough you did not think it necessary to include truly local residents and businesses on your consultation but it is clear in other documents that cross border issues are important.
- The developer only gave one opportunity for local residents to attend the presentation which was planned during working hours, we have since had no other communication.
- The planning submission appears misleading in that there is an existing 12 unit residential building at 24 Warner Street that is incorrectly designated in the Design and Access Statement as an office site and neighbour interaction has been minimal. I requested additional information during the public consultation event but didn't get a response.
- We were misled at the at the open consultation meeting for the redevelopment, we were reassured that the hotel management would be a high-end chain. Despite the small size of the rooms, which high-end visitor to London would enjoy spending a week in a tiny room without daylight.

Officer's response:

- The Neighbourhood Forum do not become a statutory consultee until the draft Neighbourhood Plan has been through examination, the Mount Pleasant Neighbourhood Plan has been through an initial independent examination but the plan did not meet all the statutory requirements and therefore did not proceed to

referendum. However the Forum were sent a consultation notification with 21 days to comment.

- Site notices were displayed around the application site to both Eyre Street Hill and Vine Hill together with Warner Street, Clerkenwell Road and Summers Street.
- The building would measure 29.75, officers measured it to be 30.6m and the applicant choose to reduce the height of the building. It will not be referred to the Mayor of London.
- The applicant has been in discussions with the Council for over a year, they also held public consultation events where residents could ask questions regarding the development and were given the opportunity to follow up with the applicants public relations team.

Safety and security

- Potential for crime, including littering and disorderly behaviour.

Officer's response:

- Safety and security concerns, see section 20 Safety and security.

Other issues

- Thames Water have identified issues with waste and fresh water. We are already suffering from a loss of water pressure and this will be significantly adversely affected by a hotel development.
- Would the gas, electricity and water supplied be able to keep pace. Electricity outages in the area are not uncommon and there is a realistic potential for loss of water pressure caused by so much demand.
- The 'Little Italy' area of Hatton Garden (comprised of Back Hill, Summers Street, Eyre Street Hill and Warner Street) form a key part of the annual Italian Festival, there is no mention of this in any of the documents and no reference is made of the impact upon the festival during or after construction.

Officer's response:

- The concerns raised by Thames Water are ones which they consider can be dealt with via condition.
- The concern regarding utilities is a civil matter to be resolved by the applicant.
- The route of the festival could be accommodated within the Construction Management Plan and discussed with the Community Working Group to agree a suitable resolution.

6 POLICIES & Guidance

6.1 National Planning Policy Framework 2019

6.2 NPPG

6.3 The London Plan 2016

6.4 Mayor's Supplementary Planning Guidance

6.5 Camden Local Plan (2017)

G1	Delivery and location of growth
H1	Maximising housing supply
H2	Maximising the supply of self-contained housing from mixed-use schemes
H4	Maximising the supply of affordable housing
H6	Housing choice and mix
H7	Large and small homes
C1	Health and Wellbeing
C5	Safety and security
C6	Access for all
E1	Economic Development
E2	Employment premises and sites
E3	Tourism
A1	Managing the impact of development
A2	Open space
A3	Biodiversity
A4	Noise and Vibration
D1	Design
D2	Heritage
CC1	Climate change mitigation
CC2	Adapting to climate change
CC3	Water and flooding
CC4	Air quality
CC5	Waste
T1	Prioritising walking, cycling and car-free development
T2	Parking and car-free development
T3	Transport infrastructure
T4	Sustainable movement of goods and materials
DM1	Delivery and monitoring

6.6 Supplementary Planning Policies

Camden Planning Guidance (2019)

CPG Design

CPG Interim Housing

CPG 2 Housing(May 2006 Updated March 2019)

CPG Energy efficiency and adaptation

CPG Transport

CPG Developer Contributions

Camden Planning Guidance (2018)

CPG Amenity

CPG Employment sites and business premises

6.7 Other documents

Hatton Garden Conservation Area Statement 2017

ASSESSMENT

The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Consultation <ul style="list-style-type: none">- Procedure
8	Land use principles <ul style="list-style-type: none">- Principle of development- Mixed use policy- Residential Use- Office Use- Hotel Use
9	Tenure and unit size mix of the proposed housing <ul style="list-style-type: none">- Policy review- Internal consultee comments- Mix of unit sizes- Tenure mix- Design and layout
10	Density and infrastructure
11	Amenity of proposed housing <ul style="list-style-type: none">- Policy review- Daylight and sunlight- Aspect and Privacy- Noise and vibration- External amenity space
12	Conservation and Design <ul style="list-style-type: none">- Statutory framework- Policy review- Designations- Assessment- Demolition- Ragged School Building- Car Park Site- Impact on wider townscape- Conclusion
13	Landscaping <ul style="list-style-type: none">- Proposed landscaping- Trees- Biodiversity
14	Impact on neighbouring amenity <ul style="list-style-type: none">- Policy review- Daylight and sunlight

	<ul style="list-style-type: none"> - Outlook - Overlooking - Noise and disturbance
15	Air quality
16	Sustainable design and construction <ul style="list-style-type: none"> - Policy review - The site and the proposal - Internal consultee comments - Energy - Sustainability - Living roofs/walls
17	Flood risk and drainage
18	Accessibility <ul style="list-style-type: none"> - Residential Units - Hotel Use - Office Use - Landscaping - Conclusion
19	Transport <ul style="list-style-type: none"> - Policy review - The site - Trip generation - Travel planning - Cycle parking - Car parking - Construction management - Deliveries and servicing - Highway works - Pedestrian, Cycling and Environmental Improvements - Private forecourt - Conclusion
20	Safety and security
21	Land Contamination
22	Refuse and recycling
23	Employment and training opportunities
24	Planning obligations
25	Mayor of London's Crossrail CIL
26	Camden CIL

27	Conclusion
28	Recommendations
29	Legal comments
30	Conditions – planning application
31	Informatives

7 Consultation

Consultation

7.1 A Statement of Community Involvement (SCI) has been submitted as part of the application which details the consultation that the applicant undertook prior to submitting their application. The applicant held a public exhibition of their proposals for which they sent 1,831 invites to local residents and businesses to attend, ward Councillors. The public event was held at the application site, 4pm to 8pm during the week to enable people to attend post work. If people were unable to attend contact details on the flyers were provided to enable follow up. The event was attended by 15 people. Officers consider this consultation was sufficient.

8 Land use principles

8.1 The principal land use considerations are as follows;

- Principle of development
- Mixed use policy
- Residential Use
- Office Use
- Hotel Use

Principle of development

8.2 Policy G1 notes, the Council will create the conditions for growth to deliver homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Council seeks to deliver growth through securing high quality development and promoting the most efficient use of land and buildings. In addition the policy notes that the Council will expect the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough.

8.3 The application site is formed of two parts, the Ragged School building which fronts Vine Hill and accommodates B1 office floorspace and the car park area which fronts Eyre Street Hill. The proposals include the alterations and refurbishment of the Ragged School building together with the erection of a new building to accommodate a hotel and residential uses to the car park site. The Council seeks to encourage growth within highly accessible areas such as Central London, where this site is located. It is also important to note that the car park site is identified

within the Hatton Garden Conservation Area Statement as a site for development. In light of this the principle of the redevelopment of the site is considered appropriate. The development will therefore be required to be consistent with the area priorities and principles as set out in the supporting text of Policy G1.

8.4 Paragraphs 2.40 and 2.41 of the Local Plan are in relation to Farringdon/Smithfield, an area shared with Islington and the City of London. The policy notes the London Plan has identified this area as an Area for Intensification. The London Plan expects a minimum of 850 homes and 2500 jobs in this location between 2011 and 2031. It is noted that within Camden there are environmental constraints in Hatton Garden due to its unique character and conservation area status so the amount of development taking place in this part of Farringdon/Smithfield is expected to be limited. With this in mind, the proposed development would be providing new homes, which would be affordable in a Central London location together with jobs from both the refurbished office accommodation and the hotel use. It is therefore considered that the development would be in line with the objectives of Policy G1.

Mixed use policy

8.5 Policy H2 requires a mix of uses in new developments, including a contribution to the supply of housing. Within the Central London Area, where a development involves additional floorspace of more than 200sqm(GIA), the Council requires 50% of all additional floorspace to be self-contained housing. Policy H2 sets out a list of criteria (points a-e) to determine whether self-contained housing is required as part of a mix of uses in a development. These are:

- a. character of the development the site and area;
- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

8.6 In light of points a, b and d it is considered that the character of the area is that of residential and commercial uses alongside each other and the size of the site would enable a mix of uses given it is a largely vacant site to the Eyre Street Hill side. Although the site is located within the Hatton Garden Conservation Area, it is not within the Hatton Garden jewellery area and therefore point c. is not relevant. The development would not be publicly funded nor serve a public purpose and therefore point e is not relevant.

8.7 In light of the above, the development would be required to provide housing as part of proposals. Policy H2 proceeds to note that once it has been established if housing should be provided as part of a development, the consideration is whether this should be on site, off site or a payment in lieu. Points f-j of the policy note criteria the Council will take into consideration to determine if it should be provided on site and the most appropriate mix of housing and other uses. Of particular relevance to this application is point i, which notes that the Council will consider the economics and financial viability of the development.

- 8.8 Based on the uplift in floorspace of 4,815sqm, in accordance with H2, the development would be expected to provide 2,407.5sqm of housing, 50% of which should be market and 50% social rent. The development is proposing to provide 1,181sqm of residential accommodation in the form of 9 units. The units would be 100% affordable; 4 social rented units all of which would be 3 beds and 5 intermediate rented units which would be 1 beds.
- 8.9 Policy H4 notes that a sliding scale applies to development that provide one or more additional homes and have the capacity for fewer than 25 additional homes, starting at 2% for one home and increasing to 2% for each additional home. Based on the expected provision of 2,407sqm this would equate to 24 homes and an affordable housing provision of 48% which equates to 1,155sqm of affordable housing. Therefore the development would be providing slightly over the required level of affordable housing based on the uplift, but not any market housing as the applicant has considered this not to be viable.
- 8.10 The applicant submitted a viability assessment in support of this point, which has been reviewed by the Council's independent assessor BPS.
- 8.11 This starting point of the assessment is to establish the value of the land. The applicant chose to use an Existing Use Value (EUV) plus, and consider the Benchmark Land Value to be £25million. However this is based on a hypothetical refurbishment of the office space to generate the proposed value.
- 8.12 BPS questioned whether it would be more appropriate to use an AUV given the level of investment required to bring the office up to standard. Therefore BPSs approach, which is in line with the Mayor's Viability SPG, is that where an EUV is based on refurbishment this should be considered an AUV. Therefore BPS adopted refurbishment costs in line with the costs for the proposed scheme and it was considered reasonable to treat as an Alternative Use Value, where the landowners premium is already included. Based on this BPS concluded the value for the Ragged School building to be £13,060,000. For the car park area, it is possible to value this with the Existing Use Value Plus and BPS have given this a value of £391,600(including the 10% landowner's premium). Totalling £13,451,600. BPS have considered it fair to say the BLV is £13,450,000. Having established the BLV the viability of the proposed development alongside alternative developments can be modelled.
- 8.13 BPS modelled both the viability of the proposed scheme and that of a policy compliant scheme that would provide 50% housing and a reduced scale hotel. It was concluded that the proposed scheme generates a surplus of £7,690,000 and the 50% housing scheme would generate a surplus of £810,000.
- 8.14 The 50% housing scheme did not take into account the viability of a reduced size hotel. The applicant noted that in reducing the hotel size it has the potential to reduce the value of the hotel by 10% per room. Following this BPS considered two scenarios, one with a 5% reduction in the hotel value and one with a 10% reduction in the hotel value. Reducing the hotel value by 5% per room, shows a deficit of £218,800. Reducing the hotel value by 10% per room, shows a deficit of

£1,248,000. This demonstrates that the viability is highly sensitive to any adjustments to the value of the hotel scheme with just a 5% reduction in value moving the scheme into a deficit. Therefore it is accepted that a 50% housing scheme would not be viable.

- 8.15 Given the proposed scheme generates a surplus of £7,690,000 and as the development would not meet the requirements of Policy H2 it is considered necessary to secure a payment in lieu of private market housing. Policy H2 allows payments in lieu of market housing only exceptionally as an alternative to on-site provision or off-site provision in the same area. The payment in lieu of housing is £700 per square metre (psm) GEA. This results in a payment of £1,095,500 which the applicant has agreed to pay. The calculation of this figure is shown below.

GIA of existing building	2,310 sq m
GIA of proposed development	1,860 sq m (office) 450 sq m (office extension) 3,634 sq m (hotel) 1,181 sq m (resi) 7,125 sq m TOTAL
Additional floorspace	4,815 sq m GIA
Floorspace required to be self-contained housing (50% of additional)	2,408 sq m
Site capacity (based on GIA rounded to the nearest 100 sq m, where each 100 sq m GIA added to residential floorspace represents capacity for one additional home)	GIA rounded to 2,400 sq m Site capacity = 24 homes
Affordable housing percentage target	24 x 2% = 48%
Affordable housing floorspace target	48% x 2,408 = 1,156 sq m GIA
Affordable housing provided	1,181 sq m
Affordable housing SURPLUS (GIA)	-25 sq m
Affordable housing SURPLUS (GEA)	-25 x 1.25 = -31.25 sq m GEA
Potential to reinvest payment in lieu in enhanced affordable housing (surplus GEA x £2,650psm)	-31.25 x £2,650 = -£82,212.50
Market housing percentage target	100% - 48% = 52%
Market housing floorspace target	52% x 2,408 = 1,252 sq m GIA
Market housing provided	0 sq m
Market housing shortfall (GIA)	1,252 sq m GIA
Market housing shortfall (GEA)	1,252 x 1.25 = 1,565 sq m GEA
Payment in lieu of market housing GEA x £700psm)	1,565 x £700 = £1,095,500
Total payment in lieu (market housing only)	£1,095,500

Table 1: Calculation of payment in lieu for market housing

Residential use

- 8.16 9 residential units are proposed altogether. These would be located within the northern section of the building fronting Eyre Street Hill. The principle of additional residential floor space is strongly supported as a priority land use under policy H1. Housing is the priority land use for Camden and the Council seeks to maximise the supply of new housing. The principle of housing on the site therefore complies with policy.

Office use

8.17 The existing site provides 2,310sqm of B1(a) office accommodation located within the Ragged School. The development includes the removal of an existing extension to the rear elevation of the Ragged School which faces the existing car park and the addition of a new extension to the north western corner of the building together with refurbishment of the building. As a result there would be no change to the amount of B1(a) floorspace which is welcomed and supported by Policy E1 which seeks to safeguard existing employment sites and premises.

Hotel use

8.18 Policy E3, notes that the Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation. It is expected that large-scale tourism accommodation is located in Central London, in areas easily reached by public transport, provide necessary pick up and set down points for private hire cars and coaches, should not harm the mix and balance of uses in the area nor lead to a loss of residential accommodation.

8.19 The applicant has provided an assessment of hotel needs within the Borough, it notes that the supply of hotels within the Borough has fallen and future growth in supply is limited. As noted in the supporting text of Policy E3, visitor numbers to London are expected to continue to increase, creating demand for more hotels and overnight accommodation. The London Plan sets a target of 40,000 additional rooms by 2036. The working paper of the London Plan, states that 37% of this expected increase in the number of rooms across Greater London will be met in Westminster, City of London and Camden. It is therefore considered that the provision of hotels in appropriate locations is acceptable to meet the projected demand subject to them according with the relevant points of E3 which are noted above in paragraph 8.18.

8.20 The application site is considered to be an appropriate location for a hotel, given the site is within the Central London Area with a PTAL rating of 6b, which is the highest PTAL rating possible. The character of the area is that of a mix of uses, with residential, office, public houses, cafes and restaurants all within close proximity to the site. It is considered that the proposed development would contribute positively to the character of the area. As the application site does not contain any residential accommodation at present, the development would not result in loss of residential accommodation, rather the development would be bringing forward some affordable housing. In terms of the set down and drop off this will be discussed in the transport section below. It is therefore considered the proposals would accord with Policy E3 and would be a suitable location for a hotel use.

8.21 It is acknowledged that concern has been raised by neighbouring residents in regard to the levels of noise that will be experienced as a result of having a hotel at the application site. Given the scale of the development there will be an increase in activity of people coming and going from the site. To ensure this is managed and kept to a minimum to mitigate the impact to neighbouring residents, it is considered necessary to secure a Hotel Management Plan as part of the Section 106 legal agreement. Such a plan would set out how the hotel operator intends to manage the coming and going to guests, mitigation measures for noise nuisance and the

hours areas of the hotel will be managed by staff. Such a plan will have to be submitted to and agreed with the Council, it is considered this will prevent the hotel use creating any undue noise and disturbance for neighbouring residents. Furthermore as noted in the 'Impact on neighbour amenity' section below, conditions will be used to secure hours of operating of the outdoor terrace areas to minimise the impact on neighbour amenity and the area generally and a Servicing Management Plan will be secured via the Section 106 legal agreement to manage the servicing of the hotel, this is explained further in the 'Transport' section below.

9 Tenure and unit size mix of the proposed housing

9.1 The considerations with regards to tenure and unit size and mix are as follows:

- Policy review
- Internal consultee comments
- Mix of unit sizes
- Tenure mix
- Design and layout
- Viability and affordable housing

Policy review

9.2 Policies H1, H2, H3, H4, H5, H6, H7 and CPG2 (Housing) are relevant with regards to new housing, including to tenure and unit size.

Internal consultee comments

9.3 When the application was originally submitted it proposed 7 x 1 beds and 3 x 3 bed with a mix of 5 social rented units (3 x 3 bed and 2 x 1 bed) and 5 intermediate units (5 x 1 bed). This results in a 62/38 tenure split in favour of social rented unit, by unit number.

9.4 However concern was raised by the Council's Affordable Housing Development Co-ordinator that the proposed mix of units would not address the needs of the borough, this concern was also raised by two of the local ward Councillors during a site visit. There is a high need for family social rented units within the borough and opportunities to secure this type of tenure south of the Euston Road is less frequent. An amendment was therefore sought to change the 2 of the social rented 1 bed units into an additional 3 bed family sized unit, to provide 4 x 3 bed units for social rent.

9.5 Officers have discussed the proposed affordable housing offer with Origin Housing who are the provider likely to take on the affordable units once built and are of the understanding they would support the proposed mix.

Mix of unit sizes

9.6 Policy H7 requires homes of different sizes. The proposed unit mix should broadly accord with the Dwelling Size Priorities Table in this policy, although the Council will be flexible when assessing development.

9.7 The proposed unit mix is 3 x 4 bed which would be social rented and 5 x 1 bed which would be intermediate rented.

9.8 With regard to unit mix, Policy H7 sets out the targets for affordable provision, which reflect broad needs across the borough. In this case, all of the social rented units would be family sized and all of the intermediate units would be 1 beds. Both of these unit sizes are noted as high demand within Table 1 of policy H7. It is therefore considered that the mix is appropriate and in line with policy H7.

Tenure mix

9.9 Under London Plan policies 3.10, 3.11 and 3.12, Camden Local Plan policy H4 and CPG2 (Housing), 50% of housing provision should be affordable for developments with a capacity of 25 or more additional homes, with a sliding scale operating for smaller developments. The split of the affordable housing provided should be 60% social rented and 40% intermediate.

9.10 9 units are proposed in total providing a floor area of 1,181sqm. All of these units would be affordable housing which is 100% of the floorspace. Of this split in terms of tenure, 4 units would be social rent at 732.2sqm which equates to 62% of the floorspace and 5 units would be intermediate rent at 448.8sqm which equates to 38% of the floorspace. Therefore whilst the number of social rented units is less, given these are family size the overall floorspace of social rented is higher than intermediate rented and in accordance with the 60/40 split set by H2.

9.11 Target rents for the affordable units will be secured via legal agreement, with specific clauses specifying that the units will be provided at target rent levels in perpetuity.

Design and layout

9.12 The proposed residential units have been designed to a high standard. The social rented units have been designed to a high quality that meet the requirements set out in the development plan (including Council and London Plan standards).

9.13 New development should conform with the minimum space standards set out in Table 3.3 of the London Plan (see below) and Camden Planning Guidance 2 - Housing. Policy 3.8 of the London Plan further recognises that a genuine choice of homes should be provided in terms of both tenure and size and provision should also be made for affordable family housing, wheelchair accessible housing and ensuring all new housing is built to Building Regulations Part M.

Table 3.3 Minimum space standards for new dwellings⁵⁷

Number of bedrooms	Number of bed spaces	Minimum GIA (m2)			Built-in storage (m2)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Table 2: London Plan Space Standards

- 9.14 All of the proposed units would exceed the floorspaces set by the London Plan with the 3 bed units all being around 118.1sqm and the 1 bed units being either 56.6sqm or 57.6sqm.

10 Density and infrastructure

- 10.1 In order to make the most efficient use of land and meet the objectives of policy G1, higher density development is encouraged in appropriately accessible locations. The emphasis on higher density development is reinforced by policy H1 (Maximising housing supply) of the Camden Local Plan, but should at all times be subject to other policies such as those protecting resident and neighbour amenity and securing the height, bulk and massing appropriate to an area in terms of good design.
- 10.2 Policy 3.4 of the London Plan requires development to optimise housing output for different types of locations taking into account local context, design and transport capacity as well as social infrastructure, open space and play space. Table 3.2 of the policy sets out various density ranges as a guide according to the central setting and accessibility criteria. The application site has a PTAL rating of 6b which is the highest PTAL rating and therefore the density expectation is 650-1100 habitable rooms per hectare(hrh).
- 10.3 Given this is a mixed use scheme, the London Plans SPG notes that it is necessary to take account of the non residential uses to calculate the density in relation to the entire site.
- 10.4 The proposal features 34 habitable rooms (hr) on an area of 0.16 hectares. Using the proposed floorspaces it is calculated that the residential floorspace makes up 16.5% of the proposed floorspace resulting in a density of 287.96hrh across the site. However the residential use only accounts for 16.5% of the floorspace, when taking into account the non-residential floorspace, the density is calculated to be 1173hrh.
- 10.5 The proposed density is not considered to be significantly above the density matrix guidelines. Furthermore, the Density Matrix is just a guide and what is acceptable on a given site will turn on a variety of considerations rather than rigid application of the matrix. The density matrix's density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure, open space and play. The London Plan requires that the potential of sites is optimised. Given the site's Excellent PTAL rating, its location close to multiple stations and bus services, it is considered that the proposed density is acceptable subject to design, heritage and amenity considerations.

11 Amenity of proposed housing

11.1 The considerations with regards to the amenity of the proposed housing are as follows:

- Policy review
- Daylight and sunlight
- Aspect and Privacy
- Noise and vibration
- Private amenity space

Policy review

11.2 London Plan policies 3.5 and 3.8 and Camden Local Plan policy H6 are relevant with regards to the amenity of proposed housing.

Daylight and sunlight

11.3 All of the family sized units would benefit from windows on three elevations all facing different directions. All living rooms would be located to the front of the building which is east facing and would exceed the ADF. Some of the bedrooms to the rear, one in each unit would not meet the required ADF levels, however given this is one bedroom of three and as the main habitable area of the unit would exceed the Average Daylight Factor (ADF) levels it is considered the amenity of the unit overall would be acceptable. Furthermore the BRE guidelines consider that bedrooms require less daylight than other habitable rooms.

11.4 In regard to the 1 bed units at 5th to 7th floors, these would also be dual aspect with windows on either east and west or north and west elevations. The applicant's daylight and sunlight assessment had demonstrated that all relevant rooms would meet the required ADF.

11.5 With regard to sunlight, the BRE recognises that the main requirement for sunlight is in living rooms with a window within 90 degrees of due south, as opposed to bedrooms. The proposed living rooms contain windows that face in an easterly and westerly direction. The orientation of these rooms means that the sunlight potential is limited. Furthermore, the degree of local obstruction surrounding the site means that there will not be the same reasonable expectation for sunlight availability.

11.6 Given the location, orientation and aspect of the proposed flats, it is considered that they would receive sufficient levels of light.

Aspect and Privacy

11.7 As all of the units would be dual aspect it is considered they would benefit from a reasonable level of outlook. The 1 bed units located to the 5th floor and above on the western side of the building would have a living room facing into the rear of the Ragged School and adjacent to 20 Vine Hill. However given the elevated height of this aspect it is considered that residents would experience a good level out outlook.

11.8 In respect of privacy given the location and orientation of the windows in the proposed units it is considered they would experience good levels of privacy.

Noise and vibration

11.9 The proposed development includes mechanical plant at roof level. A noise assessment has been submitted to the Council in respect of the proposed plant, this has been reviewed by the Council's Environmental Health officer who considers the levels set out in the acoustic assessment are reasonable and practicable to ensure noise compliance. Conditions will be used to ensure that the plant would not impact on the amenity of future residents.

11.10 In regard to the general operation of the hotel and how that would impact on the noise experienced by future residents, it is anticipated that most noise would emanate from the bar/restaurant area of the hotel. The building has been designed so the back of house facilities such as the linen store, office, IT room and storage rooms are sited to the northern end of the building, adjacent to the residential use. It will therefore provide some buffer between the activities within the bar and restaurant and the residential units. The lifts within the hotel will be located within the northern area of the hotel however not adjacent to the boundary with the residential building. It is not considered the level of noise from these would harm the amenity of the future occupiers. In addition a condition is recommended to ensure that the structure of the building shall be of such a standard that it will protect residents within the same building or in adjoining buildings from noise and vibration from the development.

11.11 In respect of the courtyard terrace, a condition is recommended to ensure this is closed late into the evening to safeguard the amenity of residents.

Private amenity space

11.12 The Mayors Housing SPG notes that a minimum of 5sqm of private outdoor amenity space should be provided for 1-2 person dwellings and an additional 1sqm per additional person.

11.13 Each unit would benefit from a private terrace, the terrace for the family sized units would measure 7.6sqm and the 1 bed units would have a terrace of 5sqm. There would also be a 52sqm communal terrace to the roof of the building accessible for all residents which would comprise 14sqm wintergarden and 38sqm of external terrace. It is also worth noting residents would have access to the shared courtyard at lower ground floor.

12 Conservation and Design

12.1 The conservation considerations are follows:

- Statutory framework
- Policy review
- Designations
- Assessment of heritage assets
- Demolition
- Ragged School Building
- Car Park Site
- Impact on the setting of the Ragged School /locally significant view from Summers Street
- Impact on wider townscape
- Conclusion

Statutory Framework and Implications

12.2 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") are relevant.

12.3 Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.

12.4 Section 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that local authorities shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

12.5 The effect of these sections of the Act is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified. This section of the report assesses the impacts on heritage assets from the proposal; whether any harm is identified and where there is such harm discusses the public benefits to be weighed against the harm in concluding.

Policy review

12.6 NPPF paragraphs 189 to 202, NPPG section 18a, London Plan policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7, Camden Local Plan policies D1 and D2 and CPG Design are relevant with regards to conservation.

Designations

12.7 There are no Listed Buildings in close proximity of the application site. There are three within the vicinity of the site, however the proposed development is not considered to impact on their setting. The map below shows them in the context of the application site:



Figure 3 – Location of Listed Building in relation to application site

1. 4 Back Hill – Roman Catholic Italian Church of St Peter and Presbytery - Grade II* listed;
2. 11 Ray Street Grade II listed, located within LB Islington; and
3. Rosebury Avenue bridge viaduct Grade II listed, located within LB Islington.

12.8 The site is in sub area 1 (Rosebery Avenue) of the conservation area. This part of Clerkenwell is a triangular area defined by the main routes of Clerkenwell Road, Rosebery Avenue and Farringdon Road and intersected by a dense network of minor streets running north to south connecting the major roads. There is a high proportion of Victorian former warehouses and twentieth-century commercial buildings in the area.

12.9 The topography of the area is unusually hilly for central London. The distinctive topography is due to the presence of the valley of the former River Fleet, aligned roughly with present-day Farringdon Road. The steep streets on the valley slopes include Herbal Hill, Eyre Street Hill, Back Hill and Vine Hill which all run downhill from Clerkenwell Road to the former river tributary.

12.10 The Hatton Garden Conservation Area Appraisal and Management Strategy describes the area as having a “strongly defined architectural character derived from its large and impressive late nineteenth-century housing blocks. These include austere ‘model dwellings’ in London stock brick (e.g. Cavendish Mansions, Clerkenwell Road; Positive) and more decorative mansion blocks in red brick with stucco ornaments (e.g. Churston, Dawlish, Dulverton and Tiverton Mansions on Gray’s Inn Road; Positive). There are also several large industrial buildings of similar or later date, including Panther House, grouped around a secluded courtyard of Mount Pleasant (Positive), and Herbal House (Positive), a monumentally treated former print works on Herbal Hill and Back Hill. As a result the overall architectural character is robust and strongly articulated though not highly decorative. The irregular street pattern has created many wedge-shaped sites that some of the best buildings turn to advantage, e.g. 144 Clerkenwell Road (Positive), which sweeps round dramatically into Back Hill. Red brick and London stock brick are the predominant materials.”

12.11 The conservation area appraisal identifies two ‘locally significant views’ which could be impacted by the scheme:

1. View north along Vine Hill toward the Ragged school
2. View west along Summer street toward Eyre Street Hill Junction.

Assessment of heritage assets

18 Vine Hill

12.12 The existing building on the site at no. 18 Vine Hill was constructed in 1878/9 as a permanent home for the Field Lane Institution and School for the Homeless Poor. The institute had been founded many years earlier by Andrew Provan, a missionary, in 1841. In its earlier years, the Ragged School moved from location to location before settling in purpose-built premises in Little Saffron Hill, a street to the east of Vine Hill in 1866. The school was part of a new and growing

educational movement, which was 'willing to teach' children for free, who were, 'too ragged, wretched, filthy, and forlorn, to enter any other place'. The school became known as the Field Lane Ragged School.

- 12.13 When Clerkenwell Road was laid out in 1870, the premises on Little Saffron Hill were demolished following compulsory purchase. The new site found for the school was the site of the existing building at no. 18 Vine Hill. The foundation stone for the building was laid by Lord Shaftesbury in 1877 and the building was completed in 1878.
- 12.14 The building is constructed in a L shape to fit the shape of Vine Hill which curves to the west at the bottom of the hill. The building is constructed in yellow stock brick with details picked out in rubbed red brick and stone/stucco (banding and key stones). The building is very robust but also very carefully architecturally composed with fine detailing.
- 12.15 The main entrance forms part of a 5+ storey element which begins with a comparatively modest doorway at ground floor level and an impressive muscular tower above the cornice at fifth floor level. The bay to the right of the main entrance with its stepped gable and separate access may have originally been staff residential or office accommodation. This part of the school has been converted into residential flats and does not form part of the application site.
- 12.16 To the left of the main entrance, the principal staircase is clearly expressed with stepped windows and string course to add emphasis to the function of the space behind. The remaining part of the principal elevation to Vine Hill has lost some detailing to the roof at parapet level.
- 12.17 To the rear, the appearance of the building does become more prosaic and while the tower and its cornice remains a prominent feature, there is none of the red brick or stone/stucco detail seen on the main elevation. The rear elevation is also dominated by a three storey brick extension that was added to the site in 1967 for the Legal and General Assurance Company (who appear to have acquired the building in the immediate post war period). Prior to the company's acquisition of the building at this time, the car park site was used as a children's playground in association with the school.
- 12.18 As a whole, the Ragged School is clearly a building of architectural and historic interest. Architecturally, the composition is well balanced with a prominent entrance bay – the tower being the most prominent aspect as opposed to the ground floor entrance itself – with lower structures either side. The overall architectural effect is a fairly austere structure (reflecting its dignified and sober use) enlivened through variety and the addition of colour and detail. The rear elevation of the main building is simply detailed and does not have the same level of architectural interest as the street elevation to Vine Hill. The three storey element with stepped gable is no longer within the site's ownership but is a key part of the overall composition of the site now and historically.

The car park site

12.19 The existing site also includes an open area to the rear (the 'car park site'). This open area has existed since at least 1942. It may be that the site was cleared following bomb damage during the early years of WWII or as a result of slum clearances in the early decades of the 20th century (post 1916).

12.20 The car park site itself was originally occupied by very poor quality slum housing. There were buildings to the street frontage of three storeys high (known from late Victorian reports on the quality of the housing) – linking The Gunmakers building to the corner of Warner Street – with a small residential court known as Eyre Court behind. Historic mapping shows that at the time of the building's construction, these 18/19th century houses still formed part of the local context.



Figure 4: OS Map of 1916 showing the institute with some house clearance but buildings to Little Bath Street (Eyre Street Hill) in situ.

12.21 By the early 1940s, the housing that previously occupied the site was fully demolished. The Goad Insurance Plan for 1942 shows that the Institute was very much a functioning organisation but that the site to the east had been cleared. This had the effect of the disconnecting the north and south parts of Eyre Street Hill. The site further east on the corner of Summers Street had also been cleared. The cleared site to the east allows for greater visibility of the rear elevation of the Ragged School than would have originally been possible. It is however the case that the tower element would have been visible in views from the east.



Figure 5: Goad plan of 1942 showing the full extent of the Institute and cleared car park site.

12.22 In the post-war period, the building was acquired by the Legal and General Assurance Company presumably as offices and as a maintenance depot of some kind. By 1949 plans show the three storey element to the south of the main entrance had been sold off and is not shown as being part of the main building in the Goad Insurance Plans of 1951. Both the car park site and separation in ownership of the main School building have therefore been relatively long-standing features.

12.23 As noted above in the site description, the Hatton Garden conservation area appraisal (adopted 2017) identifies the carpark as a 'vacant or underused' site and as 'potential development site'. Officers consider the site currently represents a poor-quality gap site in the streetscene.

Demolition

12.24 As set out above the Ragged School building is identified as making a positive contribution to the character and appearance of the Hatton Garden Conservation Area in the adopted conservation area appraisal and management strategy. The only element of demolition proposed is the removal of the existing rear extension and demolition of the garage within the car park area. As set out above the three storey rear extension was built 1967 for the Legal and General Assurance Company. The extension detracts from the appearance of the former school and its demolition and the subsequent 'repair' and 'reinstatement' of the rear façade using contemporary windows would result in a positive enhancement to the character and appearance of the building and the wider conservation area.

12.25 The carpark includes a number of small ancillary structures which would be demolished as part of the scheme. These do not make any contribution to the character and appearance of the area and their removal is considered acceptable.

Ragged School building

12.26 The existing rear extension in the car park will be replaced with a new extension to the north and west of the Ragged School building where the site is currently underutilised. The new extension will be 3 storeys high (one storey lower

than the existing school). The extension would be tucked behind the façade terminating Vine Hill and only visible along a small section of Vine Hill walking from the passage which leads from Rosebery Avenue.

12.27 The new extension has been designed with a warm toned palette of hardwearing brick which would be inserted between slender precast lintels and match the red brick features of the existing building. The tall proportions of the proposed windows echo those of the Ragged School and the new lift shafts are clad in a London Stock brick to match the current facade (which is currently stained and will be cleaned). The Vine Hill elevations of the existing Ragged School office building are primarily of a London Stock brick, with decorative red brick arched lintels and white stone string coursing. The proposed extension adopts a textured red brick to offer a contrasting tone to the London stock brick whilst relating to the red brick detailing of the Ragged School. Horizontal pre-cast concrete banding hopes to draw parallels with the existing office, whilst relief in the brickwork aims to reduce the scale of the facade. The intention is to retain the solid feel of the existing office, whilst echoing the scale and proportion of the existing openings.

12.28 The office entrance will be relocated from the entry portico of the tower to the south façade of the Ragged School building at the bottom of Vine Hill. This façade terminates the 'locally significant view' along Vine Hill. The entrance would create a more inviting, grand and accessible entrance to the office whilst reactivating this currently blank façade. The entrance would match the age and style of the building façade terminating the 'locally significant view' along View Hill.

12.29 The proposed also includes reinstating the clerestorey windows which are currently boarded up. This would be welcomed as it would reinstate part of the character of the building.

Car Park Site

12.30 The proposal would erect an 8 storey hotel in the centre of the site, leaving a gap to the south adjacent to the gun makers public house to allow views of the tower. A 7 part 8 storey affordable housing block would be built to the north of the site.

12.31 The affordable housing facade design was initially conceived as a smaller scale variation of the hotel's precast concrete elevation. However, having gone through the pre- application meetings and DRP reviews the facade was developed into a brickwork elevation reflecting the more domestic scale of the building. Each window has a solid opening side panel which naturally ventilates the space behind. The deep window reveal gives the facade modulation, shadow and a sense of solidity in line with the facades of many of the historic buildings in the area. The brick will be in light beige/grey colour, which provides a good contrast to the precast panels of the hotel alongside.

12.32 The principal hotel facade facing Eyre Street Hill is a bold, large plane, redolent in its proportion and size of the historic warehouse and factory buildings found in Clerkenwell. Pre-cast concrete facades represent a contemporary iteration of Clerkenwell's rich history of manufacturing and making.

- 12.33 Eyre Street Hill and its immediate environs contain several historic buildings whose facades have a distinct vertical emphasis. The facades of these large commercial blocks which surround the site often feature accentuated vertical piers, deep relief and mouldings and a material palette of brickwork, stone and plaster. A further vertical accent is added to this composition by the Ragged School tower.
- 12.34 The proposed robust hard-wearing façade reinforces the monumental warehousing and commercial building found in the immediate area. The design directly responds to the character of the area described in the conservation area appraisal as having an “overall architectural character [which] is robust and strongly articulated though not highly decorative.” Within this simple vertical grid, the facade has depth and shadows as well as a sense of lightness and movement.
- 12.35 The majority of Clerkenwell’s warehouse and factory buildings have a ‘base’ often treated in a darker tone to the facade above. The proposal shows a darker, more textured and larger scale series of columns interspersed with areas of glazing. The tone marries with the dark brick base of the neighbouring 3-11 Eyre Street Hill and, together with its texture gives the building an appropriately hardwearing element at street level.
- 12.36 The new publicly accessible courtyard space is created at the base of the historic Ragged School tower. Together with the distinctive alley-like external spaces between the office and hotel and hotel and Gunmakers pub this space would be used by both the residents, hotel restaurant and the Ragged School office workers. These linked courtyards marry the alleyways and passage which connect the network of street in the area.

Impact on the setting of the Ragged school/locally significant view from Summers Street

- 12.37 The Ragged School building is unique and distinctive and its design and architecture contribute significantly to its interest. Any development on the car park site will be prominent and will have an effect on the architecture of the building to varying degrees. The existing car park site currently allows for greater visibility of the rear elevation of the Ragged School than would have originally been possible. It is, however, the case that the tower element of the Ragged School would have been visible in views over the former housing which originally occupied the site.
- 12.38 During the pre-application process, the architects considered proposals which provided the affordable residential development block to the south of the site - to allow partial views of the tower over new development, in views from Summer Street (locally significant view). This was proposal was discounted for a number of planning and design reasons. Primarily they were not able to provide the level of affordable housing being proposed without obscuring views of the Ragged School tower and when locating the residential units to the south of the site they would suffer from poor amenity standards given the topography of the site. The architects were encouraged by officers and the DRP to reconsider other ways of allowing the Ragged School’s distinctive crenelated tower to be seen whilst optimising the opportunity to provide good quality housing on the site. The proposed response is to set the massing away from the Gunmakers Pub retaining partial views of all of

the tower from both Summers Street and Eyre Street Hill and locate the housing to the north of the site. Importantly this retains views of the Ragged School tower from Summer Street which is the locally significant view.

12.39 This allows the view from Summer Street to remain of interest, and arguably enhances the view by adding high quality development to the middle ground, whilst preserving views of the tower, rather than seeing the tower in the context of the carpark and poor quality 1960s rear extension.

12.40 The benefit of the existing building being distinctive and robust architecturally is that additional height on the car park would not harm the special interest of the existing building and its landmark quality. Vine Hill is very narrow and enclosed and there are glimpsed views of the building from Rosebery Avenue. In such views, additional height at the rear of the site will not affect an appreciation of the existing building. The new development creates its own narrow views from Eyre Street Hill and Summer Street of the Ragged School which reinforces the landscape and established pattern of development and intrigue which is already part of the character of the area.

Impact on wider townscape

12.41 Of primary concern to objectors has been the scale of the hotel building. This has been given careful consideration, having regard to the scheme as a whole. From a design perspective the scale and its impact on the area is considered commensurate with the broad character of the area for a number of the reasons.

12.42 As outlined above this part of Clerkenwell is made up of a dense network of medieval streets housing large scale Victorian former warehouses and twentieth-century commercial buildings. The dense narrow nature of the intersecting roads means that the scale of the buildings is not readily appreciated in long views or only as glimpsed views. This is accentuated by the topography concealing the height of buildings and reducing long range views.

12.43 The car park is sited in a bowl, close to the base of the 'hill' running down from Clerkenwell Road. This results in the development being contained within the roofscape of buildings within the area as demonstrated by the cross section below.



Figure 6: Cross section through sub area 1 running east to west

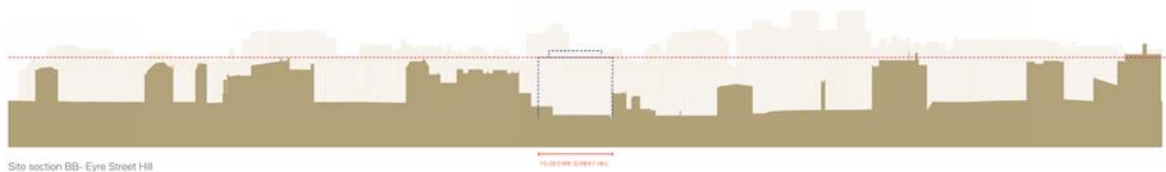


Figure 7: Cross section north to south through the site

- 12.44 When the impact of the development is judged and understood as part of the wider context including the character, topography and appreciation of development in the Conservation Area, it is considered that the development will not have an adverse effect on the skyline. The development is considered to be proportionate to the height and scale of the surrounding buildings. For example it would be the same height as Herbal House (built 1928 extended 2017) and 1-10 Summer Street (built 1923)



Figure 8: Height compared with Herbal House (left) and 1-10 Summer Street (right). Blue line indicates the parapet height of the hotel

- 12.45 There is a lack of uniformity in the surrounding built context, both in scale, proportion and facade articulation. Indeed, as can be demonstrated from the images above, the large scale buildings present in the Hatton Garden Conservation Area are largely comprised of single wide elevations with a continuous parapet line irrespective of the sloping street gradient. In keeping with this, the proposed elevation for the hotel is made up of a uniform parapet line. The parapet of the affordable housing block is set a storey lower than the Hotel's. This both expresses its different use and also forms a step that follows the general gradient of Eyre Street Hill.
- 12.46 Due to the distinct urban grain of the area the buildings will be seen in limited views. Mostly only seen in close proximity to the site. In longer range views the building is indistinguishable for the reasons set out above and would blend comfortably with the pattern of development found in this part of Clerkenwell.

Conclusion

- 12.47 For the reasons set out officers consider the proposal would enhance the character and appearance of the currently undervalued site and that no harm is caused to the character and appearance of the Hatton Garden Conservation Area. No objection is raised to the scale of the development and conclude that the overall impact, when considered as a whole, would result in heritage benefits including:

- Enhance the local significant townscape views from both Vine Hill and Summer Street. The new development in the middle ground would enhance the view from Summer Street compared with seeing the empty carpark and 1960s rear extension;
- The robust high quality design of the hotel would significantly enhance the otherwise poor quality gap site which currently exists at the site and responds positively to the character of the large scale commercial and warehouse buildings in the area;
- The design and creation of internal courtyard and glimpsed views through the site responds positively to the character of the area
- The scale and form of the development will not have an adverse effect on the skyline
- The design of the affordable housing echoes the former housing which once occupied the site.
- Refurbishment, repair and long term secure use of the Ragged School building.

12.48 Officers are aware of the concerns raised by objectors with regard to the scale of the hotel element of the scheme. In this respect, whilst officers don't consider the development to cause harm to the conservation area, if it were considered to it is worth noting how the planning and heritage merits of the scheme may outweigh that harm. In line with NPPF guidelines where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (the conservation area) any harm should be weighed against public benefits that would be derived from the scheme. In this regard if the committee consider there is any concern over the potential scale of the buildings, then the benefits offered by the proposal as a whole to an important heritage asset (the Ragged School); improvements to the car park site and in regard to affordable housing are key considerations to outweigh any perceived harm (which would be less than substantial).

13 Landscaping

13.1 The Landscaping, public realm and trees considerations are follows:

- Proposed landscaping
- Trees
- Biodiversity

Proposed landscaping

13.2 The development includes 3 landscaped areas:

- An internal courtyard at lower ground floor level which would be accessed by residents, office workers and hotel patrons.
- A terrace and winter garden at 7th floor level of the residential block solely for residents use.
- A terrace at 4th floor level for the office occupiers.

13.3 The three areas have been designed for their intended users, the office and residential terraces feature more greenery and fixed seating whereas the courtyard space is predominantly hard landscaped with climbing plants. Full details of all

three landscaped areas will be secured via condition, including details of all materials and maintenance of the planting.

Trees

- 13.4 There are currently no trees on site, the proposed development would include one tree which would be potted within the lower ground courtyard, full details of which will be secure via condition.

Biodiversity

- 13.5 Policy A3 seeks to enhance biodiversity within the borough. The development would be introducing some greening within the site, where there is currently no greening. Therefore it would be contributing towards increasing biodiversity. To further enhance this a condition is recommended to secure details of bird and bat boxes on both buildings.

14 Impact on neighbouring amenity

- 14.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:

- Policy review
- Daylight and sunlight
- Outlook
- Noise and disturbance
- Overlooking
- Other properties

Policy review

- 14.2 Camden Local Plan policies A1 and A4 together with CPG Amenity are relevant with regards to the impact on the amenity of residential properties in the area. Any impact from construction works is dealt with in the transport section.

Daylight and sunlight

- 14.3 A Daylight and Sunlight Report has been submitted as part of this application which details any impact upon neighbouring residential properties.

- 14.4 The VSC is calculated at the centre point of each affected window on the outside face of the wall in question. A window looking into an empty field will achieve a maximum value of 40%. BRE guidelines suggest that 27% VSC is a good level of daylight. If a window does not achieve 27% VSC as a result of the development, then it is assessed whether the reduction in value would be greater than 20% of the existing VSC – which is when the reduction in light would become noticeable to occupants. However, officers consider that VSCs lower than 27% are normal for urban areas, with 20% still considered acceptable.

- 14.5 The following properties were analysed for the impact of the proposal (see diagram below for location):

- Rosebery Square
- 1-10 Summers Street
- 16 Vine Hill



Figure 9 – Plan showing the Residential Buildings assessed in Blue, Ragged School Building in Orange and non-residential buildings in red.

Rosebery Square

- 14.6 Of the 83 windows tested, 82 would pass the BRE Guidelines in respect of the Vertical Sky Component(VSC) and continue to receive a sufficient levels of daylight. Of the one window that would fail, this is a small window adjacent to an existing stairwell, its loss would be 28.9% and therefore on the whole the impact to this building is acceptable.

1-10 Summer Street

- 14.7 Of the 33 windows tested, 30 would pass the VSC test of the BRE Guidelines and would continue to receive sufficient levels of daylight. Of the three windows that would not pass two of them are located to first floor serving one room, which would be served by a third window which would pass the VSC and the third to the second floor. Although these windows would fail the VSC test, when the No sky line test is undertaken it demonstrates that the daylight distribution within these two rooms would be acceptable and therefore the two rooms would continue to receive a sufficient level of daylight

16 Vine Hill

- 14.8 This property is directly to the south west of the application site and contains 4 flats, one each to lower ground to first floor and a duplex unit at second and third floors. 25 windows were assessed as part of the applicants daylight and sunlight assessment, of these, 12 meet the BRE guidelines in respect of VSC. For the 13 that failed, 10 of these windows serve 7 bedrooms, 7 of these 10 windows have a VSC of less than 20% so the impact of a small absolute value would result in a

high percentage reduction which would result in a fail to the BRE. Of the remaining 3 of the 10 bedroom windows, these are bedrooms which are served by two windows, however both would fail the VSC.

14.9 Given the results of the VSC, the applicant applied the NSL assessment. Of the 3 of the 7 bedrooms served by 2 windows, the NSL of 2 of the rooms would be 76% (2nd floor) and 80% (3rd floor), so these rooms would continue to receive 76% and 80% direct light from the sky on the working plane which is considered reasonable. The other bedroom to the 3rd floor level would have a NSL of 98% so would remain largely unaffected by the development. The other bedroom to the 2nd floor would have an NSL of 42%. To the first floor levels the bedrooms would have an NSL of 92% and 42%.

14.10 In respect of the three windows that serve the lower ground floor flat, two of these would serve a living/kitchen room and the third a bedroom. Although the living/kitchen room would fail the VSC, when the NSL test is applied to the room it is noted that it would continue to receive direct access to sky to 85% of its area. The 15% of the room which would not receive direct access would be the kitchen area which is set into the room, it is likely that artificially lighting is currently used to illuminate this area which would remain unchanged as a result of this development. The bedroom to the lower ground floor room already experiences a low VSC and as noted above the percentage impact of a small absolute value would be high, resulting in a fail. The NSL for this bedroom would be 50%.

14.11 It is also important to note that the bedrooms to lower ground, first and second floor which have an NSL of 42% (2 bedrooms) and 50% the layout of the bedrooms is such as the majority of the room layout is not directly facing the window and therefore the layout limits the receipt of light into these rooms.

14.12 Further to the above results, it is important to note that the BRE guidelines recognise bedrooms as having less of an expectation for natural light compared to living rooms which tend to be the main habitable areas of the units. All units with the exception of the lower ground floor would have their living rooms located to the Vine Hill elevation of the building, on the opposite side of the site, to where the proposed new building would be. Given this is the main habitable area for those units it is considered the unit would overall continue to have a good standard of amenity.

Sunlight

14.13 Sunlight, is to be assessed when windows face the site and are located within 90 degrees of due south. The applicant has undertaken an Annual Probably Sunlight Hours (APSH) assessment which finds that one 1 window, within Rosebery Square would fail the assessment. However this window would be unaffected during the winter months and is therefore considered acceptable.

Outlook

14.14 Outlook is the visual amenity enjoyed by occupants when looking out of their window or garden. How pleasant an outlook depends on what is being viewed, so outlook to an amenity space is more pleasant than outlook across a servicing yard.

14.15 With regard to 16 Vine Hill, and the rear windows at ground floor level, one looks onto the existing car park, following the development it would overlook the landscaped courtyard between the Ragged School and the new building. The windows to the rear elevation at ground floor look onto a private amenity space which is surrounded by a brick wall, already limiting the outlook from this window. To the elevations above, the rear windows would look onto the car park. The proposed building would be between 7.5m and 9.9m from the rear window at ground floor level given the stepped nature of the southern elevation of the building. Given the new hotel and residential building would be set in from the southern boundary of the site, views to the east would be unaltered. It is therefore considered the development would not have a detrimental impact on the outlook enjoyed by residents within 16 Vine Hill.

14.16 In respect of the other neighbouring properties, it is acknowledged that residents within 1-10 Summers Street have raised concern with the impact of the development on their outlook, however given the siting of the development site from the nearest elevation of this building which is some 20m it would not have a detrimental impact on these residents outlook. Furthermore the resulting situation would not be uncommon in central London to have two buildings of a similar mass on opposite sides of the street.

Noise and disturbance

14.17 The applicant has submitted a Noise and Vibration Assessment in support of the proposals given there would be plant located to the roof of the hotel. The assessment has been reviewed by the Council's Environmental Health Officer who raises no objection subject to conditions. Therefore conditions are recommended for the noise levels emitted from the plant together with anti-vibration measures to ensure the impact on the amenity of residents and the area generally is kept to a minimum.

14.18 With respect to the general operation and use of the hotel, a number of residents have raised concern with the increased level of activity in the area as a result of the hotel use and how this would impact on their amenity.

14.19 Eyre Street Hill is located within the Central London Area, although it does benefit from a low level of activity during the evening hours, with activity mainly being around the public house neighbouring the site. To ensure the activity of the hotel is kept to a minimum to not impact on residents amenity, a Hotel Management Plan will be secured via Section 106 legal agreement.

14.20 To ensure the use of the courtyard does not interfere unreasonably with residential amenity a condition is recommended which would control the hours of use of the courtyard by hotel patrons. Furthermore it is considered necessary to condition the hours of use of the courtyard and office terrace to ensure this is not used for late night events in the interest of protecting residents amenity.

Overlooking

14.21 CPG Amenity notes that it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties directly facing the proposed development. Where there is an existing street or public space, this

is considered to already provide an adequate separation between properties and so the 18m guideline will not apply.

14.22 The nearest residential property is 16 Vine Hill, the scheme has been designed to ensure that no windows would look directly onto the rear elevation of 16 Vine Hill. There are some windows on the southern elevation of the hotel which are the closest to the windows of 16 Vine Hill however views from this would be oblique and are unlikely to harm the privacy of these neighbouring residents.

14.23 In respect of 1-10 Summers Street, in accordance with the CPG given there is an existing street between the application site and this neighbouring building, it is considered that the street would provide adequate separation and the development would not cause harm to the privacy enjoyed by these residents.

14.24 With regard to Rosebery Square, there is an alley between the application site and the single storey element of this building and therefore sufficient distance between the new office extension and the residents at Rosebery Square to ensure their amenity would not be harmed.

Other properties

14.25 Objections have been received from neighbouring residents regarding the impact to Warner House. Officers consider given the siting of Warner House in relation to this application site, some 60m from the site it would not result in harm to the amenity of these residents. Some have raised objection to the loss of views of the Ragged School as a result of the development. However as noted in paragraph 2.15 of CPG Amenity, the specific view from a property is not protected as this is not a material planning consideration.

15 Air quality

15.1 Camden Local Plan policy CC4 seeks to ensure the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the Borough.

15.2 An Air Quality Assessment (AQA) has been submitted as part of this application. The assessment confirms that Air Quality neutral is achieved for both construction and transport emissions and the impact of the proposed development is negligible for nearby sensitive receptors and a slight impact for receptors at the development site.

15.3 With regard to the impact of construction works on air quality, the AQA has confirmed that a range of mitigation measures that have been developed for the construction phase. These would be included in the Construction Management Plan (CMP) which would be secured via Section 106 legal agreement, as discussed within the Transport Section of this report. The CMP itself would set out how these would be managed together with construction vehicle exhaust emissions and construction phase emissions.

15.4 With regard to the operation of the development, the AQA identifies that the development would have an insignificant effect on the local air quality. The

development does include a number of mitigation measures to benefit air quality which include, provision of cycle spaces for each use, no car parking on site and removing all existing car parking spaced from the site thereby reducing peoples reliance on private vehicles as a mode of transport.

15.5 In light of the above, it is considered the development would be in accordance with CC4 of the Local Plan.

16 Sustainable design and construction

16.1 The sustainable design and construction considerations are as follows:

- Policy review
- The site and the proposal
- Energy
- Sustainability

Policy review

16.2 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. It requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.

16.3 Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to:

- Target zero carbon for the residential part of the development, with a minimum of 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013 achieved on site and any remainder offset.
- Secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.

16.4 Where the London Plan carbon reduction target cannot be met on-site policy allows for a carbon-offset financial contribution which will be used to secure the delivery of carbon reduction measures elsewhere in the borough.

16.5 Developments are also expected to implement the sustainable design principles as noted in policy CC2 by

- Demonstrating that the residential development can achieve a maximum internal water use of 105 litres per day.
- Achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

The site and the proposal

- 16.6 The proposal is within Central London in very close proximity to Excellent public transport links (PTAL 6b). The scheme is mixed use, the principle of the scheme is therefore highly sustainable.

Energy

- 16.7 A range of energy and sustainability documents have been submitted as part of the application to ensure the development accords with the Mayors energy hierarchy.

Carbon Reduction(Be Lean)

- 16.8 With regard to CO2 reductions, modelling for CO2 reduction has been undertaken for each individual use. The hotel use would exceed the 35% with a carbon reduction of 37.8% and the residential would make a 47.9% reduction in CO2 emissions. This is met by enhanced building fabric and efficient mechanical and electrical systems.

- 16.9 Given the office accommodation is a refurbishment, it has been agreed it doesn't have to meet the 35% reduction in CO2 emission of Part L but it should be demonstrated how it would aim to reduce carbon emission. It has been demonstrated that given the new extension the fabric efficiency would be improved from the existing situation furthermore new windows and doors would aid in insulation and the use of an Air Source Heat Pump would also contribute towards carbon reductions. The office building would therefore make a minimum reduction of 20% in CO2 emission.

Connection to existing Decentralised Energy Network (DEN), ASHP and CHP (Be clean)

- 16.10 The development is proposing a micro-CHP for the hotel use, it has been considered that a gas CHP would not support the proposed use of the hotel given the relatively low cooling and heating loads and given the provision of Air Source Heat Pumps for space heating and cooling. It is therefore considered a micro-CHP would be sufficient for the needs of the end users.

- 16.11 For the residential use given the small number of flats it is proposed all the units would be electric. Therefore the heating and hot water provision is proposed to be met via Air Source Heat Pumps.

- 16.12 The application site is within 500m of existing DENs and less than a kilometre of potential networks. At this time the development is not proposing to connect into these networks given the location of the site in relation to the existing DENs, this approach has been accepted by the Council's Sustainability. The applicant has made a commitment to undertake a feasibility study when the proposed Combined Heat and Power (CHP) reached the end of its serviceable life which is around 15-20years, which would investigate viability of connecting to a DEN rather than replacing the CHP. This would be secured as part of the Energy Plan for the Section 106 legal agreement. Further to this, it is necessary for the development to future proof its plant and pipework to enable connection in the future if possible. It is therefore considered necessary to secure agreement within the Section 106 that

the applicant will commit to active connection to a wider network in the future when one becomes available.

Renewables (Be green)

16.13 The applicant is required to achieve a 20% of their carbon reduction via renewable energy. The development would be meeting 5.9% of this target, this is via 55sqm of solar PV panels which would be located to the roof of the hotel and the use of an Air Source Heat Pump for space heating cooling and heat recovery. Given the historic nature of the Ragged School it is accepted that it may not be appropriate to put PV panels on the roof. In respect of additional PV on the roof its noted within the applicants energy statement that overshadowing from the parapet wall and plant enclosure limit the viability of PV panels. It is recommended that a condition secures full details of PVs, including detailed roof plans, 3D roof overshadowing impact assessment, scheme of maintenance and feasibility of providing further PV on site.

16.14 With regard to the residential use, given part of the roof would be used as a terrace area, there is limited space for siting PV panels to the roof. Therefore use of renewable energy will come in the form of Air Source Heat Pumps to heat and cool the building.

Sustainability

16.15 For non-residential buildings there is a requirement to achieve a BREEAM Very Good (minimum) rating, aspiring to 'Excellent' and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

16.16 BREEAM Excellent is being targeted for each area. To ensure the credits are met to achieve the Excellent ratings a design stage with pre-assessment checker and post-assessment BREEAM reports shall be secured via Section 106 legal agreement for each use.

Cooling

16.17 In accordance with policy CC2 all development should demonstrate that measures to adapt to climate change have been implemented and that overheating risk has been managed including application of the cooling hierarchy. The cooling hierarchy is noted within paragraph 8.43 of the Camden Local Plan and includes 6 steps, which puts a preference on passive ventilation, mechanical ventilation (eg. Ceiling fans) and then active cooling (eg. Air conditioning). The supporting text to the policy also notes that active cooling will only be permitted where dynamic thermal modelling demonstrate there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.

16.18 The new building has been designed in a manner to retain heat in the winter and allow the building to dissipate heat during the summer months. The development would not be providing any active cooling, measures to reduce overheating and need for cooling. It would incorporate solar heat gain coefficient glazing to minimise heat gain, energy efficient design to minimise heat generation and passive ventilation to further reduce the level of heat gain into the space.

17 Flood risk and drainage

- 17.1 Camden Local Plan policy CC3 is relevant with regards to flood risk and drainage and seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible.
- 17.2 Thames Water has been consulted and has no objections subject to conditions as noted within the consultation response section.
- 17.3 A Flood Risk Assessment has been submitted as part of this application. This document states that the site is located within Flood Zone 1 with a low risk of flooding. The development includes a Sustainable Urban Drainage System (SUDS) in order to reduce run-off rates from the pre-development rates. For this development site this will include attenuation of rainwater and discharge into a combined sewer full details of SUDS will be secured via condition.

18 Accessibility

Residential Units

- 18.1 All of the residential units have been designed in accordance with Part M4(2), Accessible and Adaptable Dwellings, which is similar to the superseded Lifetime Homes Standards. All units would be provided with level access arranged around a single core. 1 unit (a 3 bed social rented unit) has been designed to meet Part M4(3)b, which is wheelchair accessible. The remaining units would meet M4(3)a and be wheelchair adaptable. Details of the units accordance with Part M4(2) and Part M4(3) are to be secured via condition.

Hotel

- 18.2 In line with the requirements of the London Plan Policy 4.5 the development would be providing 10% of the hotel rooms as wheelchair accessible. It is recommended that details of these rooms, including wash facilities are secured via condition, prior to the commencement of works other than demolition and site clearance.
- 18.3 With regard to other elements of the hotel design, the entrance arrangement to the hotel includes a ramp and stepped access, there is no detailing of a railing that would separate the two treatments. It is recommended this is secured via condition. Furthermore, the bar/check in desk area is combined with the bar servery at one continuous height. The design needs further consideration as with the stools there is no way of a wheelchair user approaching either the reception or the bar. The bar area should be redesigned to accommodate access for all. Given the minor nature of this alteration it is recommended that a condition required further details of the bar/check in desk to enable access.

Office

- 18.4 The proposed works to the office are refurbishment with replacement extension. Given the age of the existing building it does not have level access from street. Part the proposals include a new entrance to the Vine Hill elevation of the building, this would provide level access. The lift and a series of internal ramps would provide level access to the terrace and internal courtyard. Due to the constraints of the existing building, it is not possible to provide an accessible WC within the

reception area, however one is provided at lower ground floor level opposite the lift.

Landscaping

- 18.5 Given the topography of the site, the landscaping has been designed to provide level access on routes across the site and into buildings. Where steps are provided these would comply with Part M of building regulations. Both steps and ramps would be accompanied with tactile surfaces and contrasting materials signalling changes in level and direction. All details of such material would be secured via the landscaping condition.

Conclusion

- 18.6 It is considered the proposals have been well considered in terms of accessibility to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities in accordance with Policy C6. The Council's accessibility officer has reviewed the proposals and raises no objection subject to conditioning of M4(3) and M4(2) and compliance with building regulations.

19 Transport

- 19.1 The following transport considerations are covered below:

- Policy review
- The site
- Trip generation
- Travel planning
- Cycle parking
- Car parking
- Construction management
- Deliveries and servicing
- Highway works
- Pedestrian, Cycling and Environmental Improvements
- Private forecourt
- Conclusion

Policy review

- 19.2 Camden Local Plan policies T1, T2, T3 and T4 and CPG7 (Transport) are relevant with regards to transport issues.

The site

- 19.3 The site is located on Eyre Street Hill and Vine Street in the Central London Area and is easily accessible by public transport with a PTAL rating of 6b (excellent). The nearest transport interchange is Farringdon Station which is located to the southeast of the site. In addition, bus stops serving various routes are located nearby on Clerkenwell Road (A5201), Farringdon Road (A201) and Rosebery Avenue (A401).
- 19.4 Cyclists and pedestrians make up a significant proportion of the traffic in the vicinity of the site, particularly during peak periods.

- 19.5 The site is also conveniently located near various cycle hire docking stations, which are bike hire schemes for short journeys. Residents, staff and visitors would be able to hire a bike for the price of £2 for 24hrs and the bike could be returned to any docking station in London.

Trip generation

- 19.6 The submitted Transport Assessment (TA) includes details of trip generation analysis for the proposed development. This is based on an acceptable and recognised methodology of using data from comparable developments to identify the net impact of the proposed development when compared to the existing situation.
- 19.7 The results predict the proposed development would generate 860 additional 2-way trips per day (430 arrivals and 430 departures). They go on to predict 61 and 42 additional trips in the morning and evening peak hours respectively.
- 19.8 The assessment suggests the following modal share:
- 58% walking
 - 37% by public transport
 - 5% motor vehicles including taxis
 - 0.2% cycling
- 19.9 The results of the assessment suggest that the proposed development will not have a severe impact on the surrounding transport network. However, the proposed increase in trips during the morning peak period is much lower than expected (based on a hotel with 153 rooms, which is what was originally proposed but has been reduced during the application period). There is also some concern that trips by bicycle have a predicted modal share of less than 1%. This is much lower than would be expected for a mixed use development in a Central London location. The Council anticipates that a higher modal share for cycling and walking can be achieved via a travel plan and the implementation of public realm improvements in the local area to make cycling and walking more attractive to residents, staff and visitors.

Travel planning

- 19.10 A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. A workplace travel plan and associated monitoring fee of £6,432 would be secured as section 106 planning obligations if planning permission were granted. The Travel Plan would be targeted towards staff. The location of the site in the Central London Area with excellent connections to the public transport network would help to reduce the need to travel by single occupancy private car and would encourage staff to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

Cycle parking

- 19.11 The proposal would provide 2,310 sqm of office space, 3,634 sqm of hotel space (153 hotel rooms, which is what was originally proposed but now 146) and 10 residential dwellings (7x1 bed and 3x3 bed).

- 19.12 The proposal as indicated on the proposed ground/ lower ground floor plan would provide cycle parking facilities as follows:
- 32 long stay spaces for office staff (2 of which are easily accessible for larger bicycles such as cargo bicycles)
 - 8 long stay spaces for hotel staff
 - 17 long stay spaces for residents
 - 12 short stay spaces for visitors
- 19.13 The proposed level of provision exceeds the minimum requirement of the London Plan (current and emerging versions). The cycle parking proposals are therefore in accordance with Local Plan Policy T1.
- 19.14 The detailed design of the proposed provision and ongoing retention of the cycle parking facilities would be secured by condition if planning permission is granted. Showers, changing facilities and lockers will be provided for hotel and office staff. This is welcomed as it will encourage staff to commute by bicycle, a condition will be used to ensure these facilities are provided prior to commencement of the relevant use.

Car parking

- 19.15 The site is located within the controlled parking zone (CPZ CA-D). Parking controls are in place in bays for permit holders, pay to park bays and single yellow lines from 0830 to 1830 on Monday to Friday and from 0830 to 1330 on Saturdays. Permit holder bays are located on the east side of Eyre Street Hill. Observations indicate that demand for these bays is high.
- 19.16 The existing site benefits from at least 20 on-site car parking spaces. A car parking survey undertaken by the applicant indicates that the car park generated 32 two-way trips on the day of the survey (i.e. 16 in and 16 out). The proposed development would involve the removal of all parking spaces within the site and this would result in a reduction in motor vehicle related trips. The proposed development would be car-free. This is acceptable from a general parking point of view. It is noted that the site is easily accessible by public transport and there may not be an essential need for residents, staff or visitors to travel to and from the site by private motor vehicle. However, residents, staff and visitors in possession of a blue badge would be able to park on the public highway in the general vicinity of the site.
- 19.17 A car-free planning obligation would be secured by legal agreement in accordance with Policy T2 if planning permission were granted. This would apply to all proposed uses (Policy T2 requires all new development in the borough to be car-free).

Construction Management

- 19.18 Construction Management Plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft CMP using the Council's CMP pro-forma has been submitted in support of the planning application. However, the document lacks detail as a principal contractor has yet to be appointed.

- 19.19 A number of residents have raised concern as to how the construction works would impact on the road arrangements and cycle network within the surrounding streets. It is acknowledged the construction phase may result in some conflicts between road users, however to mitigate this conflict the CMP will be secured to ensure pedestrian and cycle safety is prioritised.
- 19.20 The site is located in the Central London Area. This part of the borough suffers from severe traffic congestion during peak periods. The Council's primary concern is public safety but subsequently ensuring that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal may lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.) during the construction phase. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A far more detailed CMP would therefore be secured via a Section 106 planning obligation if planning permission is granted.
- 19.21 The draft CMP has proposed construction traffic entering the site from Farringdon Road to Clerkenwell Road and then into Eyre Street Hill to the site. When exiting the site, construction traffic will be directed back to Farringdon Road via Warner Street. The final routes of construction traffic will be agreed as part of the formal CMP which will be secured with the Section 106 legal agreement.
- 19.22 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.
- 19.23 The development, if approved, would require significant input from officers. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction. A CMP implementation support contribution would be secured via a Section 106 planning obligation if planning permission were granted.
- 19.24 A further requirement to form a construction working group consisting of representatives from the local community would also be secured via a Section 106 planning obligation if planning permission were granted.

Deliveries and servicing

- 19.25 A servicing survey was undertaken by the applicant on Eyre Street Hill to establish the current level of trip generation associated with the site. This indicated 11 two-way movements by delivery / servicing vehicles (i.e. 5-6 visits per day). This predominantly comprises courier type deliveries undertaken by light goods vehicle (LGV) with 1 x heavy goods vehicle (HGV) delivery generated.
- 19.26 A servicing management plan has been submitted in support of the planning application. This suggests the completed development would generate 2 deliveries per day. In addition to this, the residential dwellings would generate a similar number of trips per day (e.g. refuse/recycling collections, postal deliveries

and home shopping deliveries). This modest increase in servicing related trips should have a negligible impact on the surrounding highway network as long as they are managed effectively. All deliveries, refuse and recycling collections and other servicing activity would be accommodated from the public highway in the general vicinity of the site. Such activity involving medium to large vehicles would take place from yellow lines directly adjacent to the site on Eyre Street Hill as per the existing situation. However, some activities involving smaller vehicles such as cars and motorcycles is also likely to take place from Vine Street (e.g. courier deliveries). There is some concern that deliveries, refuse and recycling collections and other servicing could have a severe impact on neighbours if not sufficiently managed. A servicing management plan would therefore be secured as a section 106 planning obligation if planning permission were granted.

Highway works

- 19.27 The carriageway and footway directly adjacent to the site on Eyre Street Hill and Vine Hill has the potential to sustain significant damage due to the proposed construction works. In addition, a redundant vehicular crossover on Eyre Street Hill would need to be removed and repaved as footway. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.
- 19.28 A highways contribution would need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the Council to remove the redundant vehicular crossover on Eyre Street Hill, repave the carriageway and footway directly adjacent to the site and repair any other damage to the public highway in the general vicinity of the site. The highway works would be implemented by the Council's highways contractor on completion of the development.

Pedestrian, cycling and environmental improvements

- 19.29 The proposed development will generate a significant increase in trips to and from the site on a daily basis. However, the transport assessment suggests that less than 1% of all trips will involve cycling. The Council's transport policies are geared towards encouraging and promoting active travel (i.e. walking and cycling). The Council would therefore seek to secure a Pedestrian, Cycling and Environmental (PC&E) improvements contribution of £200,000 as a section 106 planning obligation if planning permission is granted. This would be used by the Council alongside similar contributions secured from other major developments to transform the public realm in the general vicinity of the site for the benefit of cyclists and pedestrians. The contribution would most likely be focussed towards a cycle route improvement scheme to be developed for Clerkenwell Road. This would significantly improve conditions for cycling in the local area, thereby helping to encourage residents, staff and visitors to cycle.

Private forecourt

- 19.30 The proposed plans indicate that the building frontage adjacent to Eyre Street Hill would be recessed when compared against the neighbouring properties. This would increase the effective footway width, thereby improving the public realm for pedestrians. The Council would repave the footway directly adjacent to the site in 'like for like' materials (e.g. artificial stone paving slabs). The applicant would be

responsible for paving and maintenance of the private forecourt. A similar but slightly contrasting specification of paving slab should be used to help differentiate the private forecourt from the adjacent public highway.

Conclusion

- 19.31 The proposal would be acceptable in terms of transport implications subject to the relevant conditions and Section 106 obligations noted above.

20 Safety and security

20.1 Camden Local Plan policy C5 (safety and security) and CPG Design are relevant with regards to secure by design. The policy notes that the Council will require developments to demonstrate that they have incorporated design principals which contribute to community safety and security, particularly in wards with relatively high levels of crime such as Holborn. The proposal includes mitigation measures such as secure access to the residential lobby which will be fob operated, together with an entry phone with audio and visual link. An informative is recommended which advises the applicant to apply for Secure by Design accreditation.

20.2 The Designing Out Crime officer has been consulted as part of the application process and raises no objections to the proposal.

21 Land Contamination

21.1 The site is identified as being a site that has contaminated sites potential. It has no historical industrial use, as noted above it used to be housing, then playspace for a nearby school and following that a car park. It is therefore considered low risk of having the potential to cause ground contamination. However, areas within Camden contain made ground containing elevated levels of lead, which could pose a risk to site workers exposed to disturbed ground during site works. Consequently it is recommended that contaminated land conditions be attached to include a written detailed scheme of assessment to assess the scale and nature of potential contamination risks on the site, a site investigation in line with the scheme of assessment and the submission of remediation scheme and modifications to the mediation scheme (if necessary)

22 Refuse and recycling

22.1 Camden Local Plan policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

22.2 Separate storage rooms for refuse and recycling for each individual use is to be provided as part of the proposals. It is considered that the areas proposed are sufficient for the intended uses. These will be located off-street at ground level. The rooms would be covered and secured, accessible via a secure door to the northern side of the site. To ensure the waste is managed and brought onto street for collection and returned back to the allocated storage room a condition is recommended to secure details of the waste management plan prior to commencement of the proposed uses.

22.3 It is noted within the applicants servicing management plan that posters will be displayed within the hotel and office waste stores to identify materials to recycle. This will aid in increasing the amount of material being recycled by staff. The office and hotel will also adopt measures such as information on staff notices to increase recycling. It is considered these measures would contribute towards increase recycling within the Borough.

23 Employment and training opportunities

23.1 As the application is a major it would be required to provide some local economic benefits. Camden Local Plan policies E1 and E2 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

23.2 In line with CPG8, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106 / condition and will comprise:

Construction Phase

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per section 68 of the Employment sites and business premises CPG
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 70 of the Employment sites and business premises CPG
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 65 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 71 of the Employment sites and business premises CPG; and
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site, as per section 63 of the Employment sites and business premises CPG.

End Use

- Provision of end use apprenticeships. The apprenticeships could be within a range of roles (examples include hospitality, business administration, finance, customer service, IT)
- The applicant should provide a specified number (to be agreed) of end use work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Economic Development team, as per section 70 of the Employment sites and business premises CPG; and
- The applicant should facilitate promotion of the Camden STEAM Commission's objectives amongst end use occupiers.

23.3 Due to the provision of a hotel and in accordance with CPG Employment sites and business premises, a Section 106 contribution is sought to be used by the Council's Economic Development service to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden. This contribution, triggered by the provision of the hotel, would be calculated as follows:

No of bedrooms x 0.5 [number of employees per bedroom] = 76.5 (number of full time jobs)

76.5 x 21% (% of Camden residents who work in Camden) x £3,995 (£ per employee requiring training) = £22,462.89.

23.4 Such a contribution would be secured via Section 106 legal agreement.

23.5 Subject to securing the above points via Section 106 legal agreement the proposals are in accordance with the guidance set out in CPG Employment sites and business premises and policies E1 and E2 of the Camden Local Plan.

24 Planning obligations

24.1 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)
Payment in Lieu of market housing	£1,095,500
Highways	TBC
Pedestrian, cycling and environmental contributions	£200,000
Construction Management Plan monitoring fee	£7,565
Travel plan monitoring for office	£6,432
Contribution towards creation and promotion of employment and training opportunities	£22,462.89
TOTAL	£1,331,959.89 (+Highways and CMP monitoring fee)

25 Mayor of London's Crossrail CIL

25.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of private residential units. Based on the Mayor's CIL charging schedule and the information provided as part of the application, the Mayoral CIL is based at £50 per sqm. Affordable housing benefits from social housing relief from CIL. Given the office has been in use continuously for 6 months over the last 36months it is not liable to pay CIL. Based on the floor area for the hotel (3634sqm) the development is estimated to contribute £181,700.

26 Camden CIL

26.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). The site is located within Zone A. Affordable housing benefits from social housing relief from CIL. Given the office has been in use continuously for 6 months over the last 36months it is not liable to pay CIL. For hotel CIL is charged at a rate of £40per square meter. The estimate based on the uplift of floorspace for the Camden CIL liability is estimated to be £145,360.

27 CONCLUSION

27.1 The proposed development, is a well considered scheme which is as a result of extensive pre-application discussions and discussions during the course of the application.

27.2 With regard to land use, the development would provide a good mix of land uses which will contribute towards growth within the Borough. The introduction of the hotel will activate the ground floor of this part of Eyre Street Hill and with effective management would not have a detrimental impact on the amenity of residents. The provision of affordable housing within part of the Borough where such a provision is lacking, is a welcomed part of the development and will contribute towards meeting the Boroughs need for family sized social rented units. The refurbishment of the office accommodation will contribute towards growth within the Borough.

27.3 The applicant has sought to demonstrate a commitment to high quality design that takes account of the setting and conservation area it is set within, using materials that are appropriate to the surrounding area.

27.4 Officers consider this will be a high quality development which will utilise a vacant site and improve the usability of the existing office accommodation. All planning considerations have been given their due weight and it is considered the benefits of the proposal outweigh any perceived harm. It is therefore recommended for approval subject to conditions and Section 106 Legal Agreement.

28 RECOMMENDATIONS

28.1 **Grant conditional planning permission subject to Section 106 Legal Agreement covering the following Heads of Terms:-**

Affordable housing

- Target rents
- Affordable Housing
- £1,095,500 Payment In Lieu of no market housing

Employment and training

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per section 68 of the Employment sites and business premises CPG.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 70 of the Employment sites and business premises CPG
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 65 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 71 of the Employment sites and business premises CPG.
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site, as per section 63 of the Employment sites and business premises CPG.
- The S106 should broker a meeting between the end user(s) of the ground floor retail units and the Economic Development team to discuss our employment and skills objectives. Including end use apprenticeships. The apprenticeships could be within a range of roles (examples include hospitality, business administration, finance, customer service, IT).
- The applicant should provide a specified number (to be agreed) of end use work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Economic Development team, as per section 70 of the Employment sites and business premises CPG; and
- The applicant should facilitate promotion of the Camden STEAM Commission's objectives amongst end use occupiers.

- Contribution of £22,462.89 towards initiatives which create and promote employment and training opportunities.

Energy and sustainability

- BREAAM Excellent compliance and post construction review, targets as stated in the energy and sustainability statements for Energy, Materials and Water
- Energy measures including on-site renewables
- Energy provisions to be secured through Energy Efficiency & Renewable Energy Plan - each use should achieve a minimum 35% CO2 reduction beyond Part L 2013 AND 20 % reduction through renewables as defined within the approved statements.
- Sustainability measures for the whole development in accordance with approved statements

Hotel Use

- Hotel Management Plan

Transport

- Car free housing
- Construction Management Plan (CMP), associated monitoring fee of £7,565 and associated requirement for a Construction Working Group to be formed prior to commencement.
- Delivery and Servicing Management Plan
- Financial contribution for highway works directly adjacent to the site. Works to include repaving of carriageways and footways on Eyre Street Hill and Vine Hill together with removal of redundant vehicular crossover on Eyre Street Hill.
- Level Plans are required to be submitted for all plots at the appropriate stage showing the interaction between development thresholds and the Public Highway to be submitted to and approved by the Highway Authority prior to any works starting on-site. The Highway Authority reserves the right to construct the adjoining Public Highway (carriageway, footway and/or verge) to levels it considers appropriate.
- Financial contribution for pedestrian, cycling and environmental improvements in the general vicinity of the site (i.e. aspects of the wider vision for public realm improvements within the public highway) of £200,000.
- Workplace Travel Plan and associated monitoring contribution of £6,432

29 LEGAL COMMENTS

29.1 Members are referred to the note from the Legal Division at the start of the Agenda.

30 Conditions – planning application

1	Three years from the date of this permission
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	<p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <ul style="list-style-type: none"> 13548-A LXX 03 001 Rev A, 13548-A LXX 03 010 Rev A, 13548-A L-1 01 099, 13548-A L00 01 100, 13548-A LM0 01 101, 13548-A L01 01 102, 13548-A LM1 01 103, 13548-A L02 01 104, 13548-A LM2 01 105, 13548-A L03 01 106, 13548-A LXX 01 201, 13548-A LXX 01 202, 13548-A LXX 01 203, 13548-A LXX 01 301, 13548-A LXX 01 302, 13548-A L-1 02 099, 13548-A L00 02 100, 13548-A LM0 01 101, 13548-A L01 02 102, 13548-A LM1 02 103, 13548-A L02 02 104, 13548-A LM2 02 105, 13548-A LXX 01 201, 13548-A LXX 01 202, 13548-A LXX 01 203, 13548-A LXX 02 301, 13548-A LXX 02 302, 13548-A LLG 00 099 Rev A, 13548-A LUG 00 100 Rev A, 13548-A L01 00 101 Rev B, 13548-A L02 00 102 Rev B, 13548-A L03 00 103 Rev B, 13548-A L04 00 104 Rev C, 13548-A L05 00 105 Rev B, 13548-A L06 00 106 Rev B, 13548-A L07 00 107 Rev B, 13548-A LRF 00 110, 13548-A LXX 04 101 Rev A, 13548-A LXX 04 102 Rev A, 13548-A LXX 04 104 Rev A, 13548-A LXX 04 105 Rev A, 13548-A LXX 05 101 Rev A, 13548-A LXX 05 102 Rev A, 13548-A LXX 04 103 Rev A, 13548-A LXX 04 105 Rev A(Proposed West Elevation Hotel and Affordable Block, 13548-A LXX 04 105 Rev B(Proposed Section E-E) and 13548-A LXX 04 106 Rev A. <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings/samples(Ragged School Building)</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following for the extension to the Ragged School, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved</p>

	<p>by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the Camden Local Plan.</p>
4	<p>Detailed drawings/samples(Eyre Street Hill Building)</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following for the new building on Eyre Street Hill (Hotel and Residential Uses), shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the Camden Local Plan.</p>
5	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the Council.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the Camden Local Plan.</p>
6	<p>Refuse and recycling</p> <p>Prior to first occupation of each of the relevant uses in each building, the refuse</p>

	<p>and recycling storage areas shall be completed and made available for occupants of that building.</p> <p>The development of each block shall not be implemented other than in accordance with such measures as approved. All such measures shall be in place prior to the first occupation of any residential units in the relevant plot and shall be retained thereafter.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy CC5 of the Camden Local Plan.</p>
7	<p>Landscape</p> <p>No hard and soft landscaping shall take place on the relevant part of the site until full details and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. Such details shall include:</p> <ul style="list-style-type: none"> a) details of any proposed earthworks including grading, mounding and other changes in ground levels. b) an open space management plan. c) details of all planting to terraces and lower ground courtyard, including proposed tree. <p>The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A1,D1 and A2 of the Camden Local Plan 2017.</p>
8	<p>Hours of use: Terrace for office use</p> <p>The terrace located at 4th floor of the Ragged School building, 18 Vine Hill, shall only be used during the hours of 0700 to 2100 Monday to Saturday and 1000 to 2000 on Sundays and Bank Holidays.</p> <p>Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise and disturbance in accordance with the requirements of policy A1 of the Camden Local Plan 2017.</p>
9	<p>Hours of use: Lower ground Terrace Hotel Use</p> <p>The terrace located at Lower ground floor level in association with the hotel use shall only be used during the hours of 0700 to 2200 Monday to Saturday and 1000 to 2100 on Sundays and Bank Holidays.</p> <p>Reason: To ensure that the amenity of occupiers of residential properties in the</p>

	area is not adversely affected by noise and disturbance in accordance with the requirements of policy A1 of the Camden Local Plan 2017.
10	<p>Hours of use: Lower ground Courtyard Office Use</p> <p>The Courtyard located at Lower ground floor level shall only be used by office occupiers during the hours of 0700 to 2200 Monday to Saturday and 1000 to 2100 on Sundays and Bank Holidays.</p> <p>Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise and disturbance in accordance with the requirements of policy A1 of the Camden Local Plan 2017.</p>
11	<p>SUDS</p> <p>Prior to commencement of the relevant part of the development details of a sustainable urban drainage system shall be submitted to and approved by the local planning authority in writing. SUDS shall be will be implemented prior to the occupation of the relevant parts of the development and permanently retained and maintained thereafter.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan.</p>
12	<p>CHP</p> <p>Prior to commencement of any development other than works of demolition, site clearance & preparation, full details of the proposed combined heat and power unit (CHP) plant and confirmation that the plant will comply with the Mayor's emission standards as set out in the Mayor's Sustainable Design and Construction SPG (2014), and details of any necessary NO2 abatement mechanisms shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy A1 of the Camden Local Plan 2018.</p>
13	<p>Solar PV</p> <p>Prior to first occupation of the hotel and residential building, detailed plans showing the location and extent of photovoltaic cells to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policies CC1 and CC2 of the Camden Local Plan 2017.</p>

14	<p>Water efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation of each Plot, evidence demonstrating that this has been achieved shall be submitted and approved by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan.</p>
15	<p>Non-road mobile machinery</p> <p>All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle – with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements policies A1 and CC4 of the Camden Local Plan.</p>
16	<p>Land contamination</p> <p>Prior to commencement of any works on site, a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas shall be submitted to and approved by the local planning authority in writing.</p> <p>The site investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures [if necessary] shall be submitted to and approved by the local planning authority in writing.</p> <p>The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority in writing prior to occupation.</p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination will be dealt with</p> <p>Reason: To protect future occupiers of the development from the possible</p>

	presence of ground contamination arising in connection with the previous use of the site in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.
17	<p>Plant and equipment</p> <p>Prior to first use of the relevant part of the development, details of plant machinery shall be submitted to and approved in writing by the Local Planning Authority. The measures shall ensure that the external noise level emitted from plant/machinery/equipment will be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out where required to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from plant/mechanical installations/ equipment.</p>
18	<p>Anti-vibration measures</p> <p>Prior to installation of machinery, plant or equipment and ducting at the development each item shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
19	<p>Vibration between uses</p> <p>No vibration shall be transmitted to adjoining or other premises and structures through the building structure and fabric of this development as to cause a vibration dose value of greater than 0.4m/s (1.75) 16 hour day-time nor 0.26 m/s (1.75) 8 hour night-time as defined by BS 6472 (2008) in any part of a residential and other noise sensitive property.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by ground- or airborne vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
20	<p>Noise Levels between uses</p> <p>The design and structure of the Eyre Street Hill building shall be of such a standard that it will protect residents within the same building or in adjoining buildings from noise and vibration from the development, so that they are not exposed to noise levels indoors of more than 35 dB LAeq 16 hrs daytime and</p>

	<p>of more than 30 dB LAeq 8 hrs in bedrooms at night.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise from external noise sources in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
21	<p>Cycle parking</p> <p>Other than works of demolition and site clearance, no development shall commence until full details of the following bicycle parking shall be provided:</p> <ul style="list-style-type: none"> a) Secure and covered parking for 17 residents cycle spaces b) Secured and covered parking for 32 office occupiers cycle spaces c) Secured and covered parking for 8 hotel staff spaces d) Parking for 12 visitor cycle spaces <p>All such facilities shall thereafter be permanently maintained and retained in accordance with the approved details.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policies T1 and T3 of the Camden Local Plan 2017 and the London Plan.</p>
22	<p>Biodiversity Enhancements</p> <p>Prior to commencement other than demolition, site clearance and preparation a plan showing details of biodiversity enhancements on the buildings and within the open space (including bird and bat boxes) appropriate to the development's location, scale and design (including wetland areas) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of Policy A3 of the Camden Local Plan 2017 and the London Plan.</p>
23	<p>Accessibility: M4(2)</p> <p>Other than the unit to first floor level, the residential units shall be designed and constructed in accordance with Building Regulations Part M4 (2), evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.</p> <p>Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy C6 of the Camden Local Plan 2017.</p>

24	<p>Access – M4(3)</p> <p>The unit located to the first floor of the residential building, as indicated on the plan number/s hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (3). Evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.</p> <p>Reason: To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with policy C6 of the Camden Local Plan 2017.</p>
25	<p>Access – Hotel Bar/Check-in Desk</p> <p>Notwithstanding the hereby approved plans, a detailed plan of the bar/check in area shall be submitted to and approved in writing to ensure the provision of an accessible level area is provided.</p> <p>Reason: To ensure the development provides fair access for all in accordance with the requirements of Policy C6 of the Camden Local Plan 2017.</p>
26	<p>Access – Hotel Rooms</p> <p>Prior to the commencement of use of the hotel, there shall be the provision of 15 (10%) fully wheelchair accessible rooms.</p> <p>Reason: To ensure that the internal layout of the building makes sufficient provision for the needs of people with disabilities in accordance with the requirements of policy 4.5 of the London Plan 2016 and Policy C6 of the Camden Local Plan 2017.</p>
27	<p>Piling Method Statement</p> <p>No impact piling to commence until a piling method statement, prepared in consultation with Thames Water or the relevant statutory undertaker, detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works, has been submitted to and approved in writing by the local planning authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of policy A5 of the Camden Local Plan 2017.</p>
28	<p>Existing Water Supply Infrastructure</p> <p>Prior to the commencement of above ground works, an impact studies of the</p>

	<p>existing water supply infrastructure shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. The study shall identify any new additional capacity required in the system and suitable connection point.</p> <p>Reason: To ensure the water supply infrastructure has sufficient capacity to cope with the additional demand in accordance with the requirements of Policy A5 of the Camden Local Plan 2017.</p>
29	<p>Waste Management Plan</p> <p>Prior to occupation of the relevant use, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the permitted uses and permanently retained thereafter.</p> <p>Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
30	<p>Fire Statement</p> <p>No above ground new development shall commence in a Phase until a Fire Statement for the relevant Phase has been submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The relevant Phase of the development shall be carried out in accordance with the approved details.</p> <p>Reason: In order to provide a safe and secure development in accordance with policy CP3 of the Core Strategy and policy D11 of the Draft London Plan.</p>
31	<p>Mechanical Ventilation</p> <p>Other than works of demolition and site clearance, no development shall commence until full details of the proposed Mechanical Ventilation system shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To safeguard the amenity of future occupiers of the development site in accordance with the requirements of policy A1 of the London Borough of Camden Local Plan 2017.</p>

31 Informatives – planning application

1	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
2	This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.
3	Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
4	This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
5	Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
6	You are advised that Section 44 of the Deregulation Act 2015 [which amended the Greater London Council (General Powers) Act 1973]] only permits short term letting of residential premises in London for <u>up to 90 days per calendar year</u> . The person who provides the accommodation must be liable for council tax in respect of the premises, ensuring that the relaxation applies to residential, and not commercial, premises.

7	In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921.
8	In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. The applicant is advised to visit thameswater.co.uk/buildover
9	A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at https://wholesale.thameswater.co.uk/Wholesale-services/Businesscustomers/Trade-effluent or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

APPENDIX 1 - Independent Viability Review (BPS)

