

APPENDIX B

DESIGN, ACCESS, SUSTAINABILITY AND PLANNING POLICY SUPPORT STATEMENT rev a

16 Vine Hill, EC1R 5EA

DESIGN, ACCESS, SUSTAINABILITY & PLANNING POLICY SUPPORT STATEMENT

Revision A

1.0 INTRODUCTION

- 1.1. This application is for alterations and extensions to the building which involve a change of use of the building from B1(a) office use to permanent C3 residential use. This statement is supplementary to the planning application for the above property, which comprises the completed application form, site location plan, and existing and proposed drawings.
- 1.2. The issues addressed in this statement are:
 - 2.0_ Change of use from B1(a) office use to permanent C3 residential use
 - 3.0_ Design and Character (inc height and bulk)
 - 4.0_ Impact of the proposal on neighbours
 - 5.0_ Inclusive Access (inc lifetime homes)
 - 6.0_ Sustainability
 - 7.0_ Transport and parking considerations
 - 8.0_ Housing mix

2.0 CHANGE OF USE

Introduction.

- 2.1 Its location is within a mixed use (residential and offices) area, towards the end of a narrow cul-de-sac street, within the defined Central London area, but outside (north) of the defined Hatton Garden area within which policy DP13 protects existing B1(a) office uses, and not within any other town centre.
- 2.2 Prior to this application, pre-application advice was sought in relation to the principle of proposed change of use. Advice and guidance was received from the duty planning officer Scott Seide, and from Rob Farnsworth and Emma Fenton of the Camden Planning Policy team; this guidance has been documented by emails, which showed that the officer view at pre-application stage was generally favourable in relation to policy compliance in the particular circumstances.

Supply and demand of offices and housing in Camden, and the consequential strategic policy position in relation to their protection and encouragement.

- 2.3 Any detailed policies, whether for the protection and employment use or the promotion of residential use, are to be read within the context of the overarching Core Strategy, whose overall assessment of problems and opportunities giving rise to the vision is of over-riding importance.
- 2.4 Policy CS8 "Promoting a successful and inclusive Camden economy" sets out the strategy for the promotion and the safeguarding of employment uses. Paragraphs 8.4 – 8.8 are particularly key, and which confirm that:
 - (i.) 40% of Camden employment uses are in offices and that there is a high concentration of offices within Central London.

- (ii.) Of the projected 615,000 sq m of demand for office space until 2016, 514,000 (83%) will be met by development at King's Cross and Euston. The further significant but smaller levels of office development in the growth areas of Holborn and Tottenham Court Road, and of other smaller scale office buildings in Central London and Camden Town would create an overall provision that (subject to market conditions over the plan period.) would exceed this demand.
 - (iii.) Paragraph 8.8 summaries the consequences of this potential excess of supply over demand on the protection of the office use in the particular circumstances that relate to this building:

“The provision outlined above means that the future supply of offices in the borough can meet projected demand. Consequently, the Council will consider proposals for other uses of older office premises if they involve the provision of permanent housing” and refers to policy DP13 in Camden Development Policies for more detail.”
- 2.5 In summary, Core Strategy Policy CS8 permissive stance in respect of the loss of office use in the particular circumstances that relate to this building contrasts Core Strategy Policy CS6 (“Providing Quality Homes”), which positively encourages residential development in order to ***“make full use of Camden’s capacity for housing”*** in order to seek to exceed their homes target numbers. CS6 affirms that Camden will aim to *do this* by ***“maximising the supply of additional housing”*** and by ***“regarding housing as the priority land-use of Camden’s Local Development Framework.”***

DP13 – Employment premises and sites

- 2.6 Policy DP13 provides that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:
- a) *it can be demonstrated to the Council’s satisfaction that a site or building is no longer suitable for its existing business use; and*
 - b) *there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.*
- (a) Lack of suitability of the building for continued business use
- 2.7 The existing building was designed and built as a traditional residential building. It has all the typical physical characteristics of such: small floor plates, cellular rooms, low ceiling heights, small domestic sized windows, stair winders etc.
- 2.8 Furthermore, there are no loading facilities, and the servicing by/parking of commercial vehicles is very difficult as Vine Hill is a very narrow and steep cul-de-sac.
- 2.9 Paragraph 13.3 within DP13 sets out the location features that Camden considers whether there is potential for that use to continue, taking into account whether the site:
- (i.) *is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing*

The site is not located in or adjacent to such areas.
 - (ii.) *is in a location suitable for a mix of uses including light industry and local distribution warehousing*

The site is not located within an area suitable for light industry and local distribution warehousing as it is very difficult to get access to the property with a commercial vehicle. Vine Hill is a narrow cul-de-sac with a relatively steep gradient off Clerkenwell Road. The width of the carriageway is 3.7m. It is impossible to turn any vehicle around, and there is no

room for vehicles to pass one another. Should any vehicle stop in the road so as to load or unload, no other vehicle could get past.

- (iii.) *is easily accessible to the Transport for London Road Network and/or London Distributor Roads*

Although the route from Vine Hill to the TLRN at Farringdon Road via Clerkenwell Road is reasonably easily accessible, that from the property to the junction of Vine Hill and Clerkenwell Road is not, given the constraints within Vine Hill.

- (iv.) *is, or will be, accessible by means other than car and has the potential to be serviced by rail or water*

Access by car to the property is restricted, given the street's narrowness, and it has no other means of access to it, save by foot. It is a long way from any rail or water transport nodes.

- (v.) *has adequate on-site vehicle space for servicing*

There is no on-site vehicle space for servicing and no potential to create any.

- (vi.) *is well related to nearby land uses*

The property is well related to nearby land uses, which include a mixture of residential and office uses.

- (vii.) *is in a reasonable condition to allow the use to continue*

The building's condition is not suitable for its continued use as an office. Please see the explanation of the design features below.

- (viii.) *is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards*

The site is not near any other industry and warehousing, noise/vibration generating uses, pollution and hazards.

- (ix.) *provides a range of unit sizes, particularly those suitable for small businesses (under 100sqm)*

It is not practical to subdivide the building to provide a range of unit sizes as it is too small (4 floors each of NIA of approx 50sqm, served by 1 staircase), to economically and practically facilitate the provision of the necessary separate sanitary facilities for each business on individual floors, as required by the Workplace Health, Safety and Welfare Regulations.

- 2.10. Paragraph 13.4 within DP13 sets out the design features that Camden considers as being necessary for the suitability of a building to be able to be flexibly used for a range of business uses. These are tested as follows to assess whether this building as it exists, is suitable for continued business use, or whether it may easily be adapted to be made to do so. These design features are addressed as follows:

- (i.) *clear and flexible space with few supporting columns;*

The building comprises of 2 small domestic sized rooms (average 25 sq m) on the ground and upper floors, which are the only floors that can be used for office staff. On the lower ground floor, there is only 1 room (currently in use as a kitchen of about 15 sq m) which has

any natural light, and the rest is – at best - ancillary storage which has a limited usefulness due to its poor access. (see iii. below).

The walls separating the front and rear rooms on each floor are load bearing. As such, they cannot be removed without a steel beams and columns being inserted on each floor. Those columns would require significant new foundations to take the point loads, the construction of which would then necessitate underpinning of the adjacent party walls.

This very small amount of usable space on each floor, results in a very poor 65% net / gross area ratio (rather than the 90+ % required in modern offices) and which little can be done about, given the overall very small floor-plate.

The combination of these design features means that the building is highly unsuitable for flexible use and cannot viably be adapted to be as such.

(ii.) *adequate floor to ceiling heights;*

The existing building has domestic scale ceiling heights. As such, any opening up of the floor plan to a single space / floor would produce a more oppressive feel of a low ceiling by comparison with the resultant room size. Furthermore, a low ceiling makes it more difficult to achieve evenly good quality room lighting, particularly up-lighting which bounces light off the ceiling to produce a good quality of even background lighting.

(iii.) *wide doors/corridors;*

The corridors (by the staircase) is 900 mm wide and doors from it into the usable floor space is only around 700 mm wide, which is too narrow for wheelchair access, even if one could get a disabled person up to the relevant floor. This would at least fail building regulations.

The existing staircase with winders which cannot be used to accommodate a wheelchair stair-climber. There is no lift. It is not possible to adapt the staircase or to insert a lift without significant further loss of net usable floor space which would reduce the usable floor space so much as to make it unviable.

In conclusion, it is non compliant with DDA access for employment use and cannot practically be made to be compliant.

(iv.) *loading facilities;*

There are none. The site backs on to a car park owned by the neighbour. Although there is a door that leads out the rear, the right to use this door and to pass across the neighbour's land is strictly only for the purpose of means of escape in case of fire, and not for any other purpose, including access or servicing of any kind.

(v.) *large amounts of natural light;*

The building has traditional domestic size and shape windows, as opposed to the full width glazing typically necessary in modern offices. As such the quantity of daylight is more restricted than is desirable for office use. For energy and sustainability reasons, one needs a high level of daylight to create the necessary quality of background lighting, rather than relying upon artificial light.

(vi.) *availability of a range of units sizes;*

The building is so small already, that it is not feasible to break it up into more than one unit; consequently a range of sizes cannot be accommodated.

(vii.) *space for servicing by/parking of commercial vehicles.*

See (iv.) regarding the lack of loading facilities.

In addition, the servicing by/parking of commercial vehicles is very difficult. Vine Hill is a narrow cul-de-sac with a relatively steep gradient off Clerkenwell Road. The width of the carriageway is 3.7m. It is impossible to turn any vehicle around, and there is no room for vehicles to pass one another.

At present, all servicing is carried out to all the buildings within this street (save for no 18 vine hill, which owns the car park at the rear referred to in (iv.), has to be carried out by the service vehicle (including the rubbish vehicles) stopping in Clerkenwell road, and reversing around the corner and down the steep hill with very little room for mistake in that reversing manoeuvre.

(b) Exploration, over an appropriate period of time, the retention, re-use or redevelopment for similar or alternative business use

- 2.11. Paragraph 13.5 within DP13 requires the demonstration of the lack of a realistic prospect of demand to use the site for an employment use, by way of a thorough marketing exercise. This paragraph gives guidance that this would be achieved if the marketing had been sustained over at least two years. A thorough marketing exercise has been carried out, not for 2 years, but for a period of 9 months, until the property was bought by the present owner and applicant.
- 2.12. It is noted that the reference to the marketing period being for 2 years is within the guidance / explanatory context paragraph to the policy, rather than within the policy itself, where the actual requirement is instead for an “*appropriate period of time*”. This assessment of what is an “*appropriate*” period of time should be read as being what is appropriate in the context of the over-arching policy considerations, i.e. those set out within the Core Strategy.
- 2.13. Core Strategy policy CS8 requires Camden to “**consider proposals for other uses of older office premises if they involve the provision of permanent housing**”, and thus creates a permissive and supportive approach to a change of use decision in respect of buildings with features and circumstances precisely of those which this application subject property has. Because this strategic approach (which is permissive and supportive) to the change of use from office B1(a) to permanent residential C3 carries greater weight than guidance text in a supporting paragraph to the detailed development policy DP13 that is situated within this strategic policy context, policy DP13 itself refers to the necessity to market test over an “*appropriate*” period of time, rather than over the 2 year period referred to within paragraph 13.5. It is submitted that in these particular circumstances, a thorough marketing exercise over a 9 month period is appropriate.
- 2.14. Paragraph 13.5 within DP13 also requires evidence of the marketing has been “*thorough*”, which is demonstrated by the following:
 - (i.) The property was marketed by Richard Susskind, Chartered Surveyors. Detailed full particulars were set out on 5 estate agency industry web-sites and also sent to 500 City and West End commercial agency practices, many other local occupiers and all the contacts on the database of parties seeking properties of this type held by the retained agents. Resulting from this extensive campaign, significant interest was received and further details were then issued to those interested parties almost on a daily basis. From this interest, a number of inspections of the property took place with a wide range of business occupiers; however, prior to the offer by the present owner and applicant, there no other offers at all were received.
 - (ii.) The report from Richard Susskind & Co of the 17th June 2011, attached as appendix 10.1, noted the reasons given by those interested parties why they did not take the matter further. It notes that the prospective business occupiers could not take it because of: the layout of the small floor plates on a number of floors was impractical, there was limited light, no flexibility and that it would be very difficult to make DDA compliant.

- (iii.) It is because the existing building had physical restrictions of this kind that the vendor, The Field Lane Society, has sold and is moving its office operations to more suitable accommodation. It is moving its offices to other purpose built office accommodation in Victoria (11 Belgrave Road SW1 V1RB), where they have, for instance: a proper open plan layout on one floor, full width glazing, proper lifts and heads heights, proper servicing etc. The Field Lane Society, a registered housing charity, has advised us that these new premises with these design features are much better suited to their needs. We would be happy to provide written confirmation of this fact from The Field Lane Society, should that be required.

2.15. Paragraph 13.5 within DP13 also requires the property to be “*marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers.*” These are addressed as follows:

- (i.) *marketed at realistic prices.*

The property was marketed with a guide price of “offers over £800,000”. This represents a value of £320 / sq ft, which is the correct current price market place at this time. Such a price is considerably cheaper than it would have been a few years ago.

Any marketing strategy always puts out a guide price slightly higher than that which is expected to be achieved as any purchaser would similarly expect to be able to negotiate it down a little; as such it would be expected that this property would sell at around the £800,000 level. In fact it was bought by the present owner and applicant for £790,000.

A formal “red book” valuation, of the nature required by banks, has been prepared by Pater Goodman Merriman, Chartered Surveyors: such a valuation traditionally takes a conservative approach to valuation below the current market levels, so as to cover for future unforeseen property value crashes. Notwithstanding this cautiousness, the valuation was for £760,000.

This evidence fully supports the conclusion that the property has been marketed at realistic prices.

- (ii.) *include a consideration of alternative business uses and layouts and marketing strategies,*

It is self evident that those design and location features of the building that make it unattractive to an office occupier, would make it particularly more unattractive to alternative business uses such as B1(c.), where one requires even more accommodating physical features: head height, light, width of corridors, lifts, servicing access etc. The nature marketing that was carried out, as explained in 2.15 (i.) above, demonstrates the extensive range of marketing strategies used.

- (iii.) *include a consideration of management of the space by specialist third party providers.*

The study that was made to manage the space by specialist third party providers concluded that the very small overall size of the building, which yielded a net usable floor space of only about 2,000 sq ft, made it unviable to be run by specialist third party providers. Such a type of operation incurs significant overheads of the reception and other service / management which can only be recouped by tenanted buildings of many times this size.

The conclusion to be drawn from these paragraphs 2.15 + 2.16 is that the site is not suitable for any business use other than B1(a) offices. In these circumstances, DP 13 entitles to “*allow a change to permanent residential uses...except in Hatton Garden*”. As this site is not within the defined Hatton Garden area (in the LDF proposal map 2010), all the relevant considerations within policy DP13 are satisfied for Camden to grant an approval which involved the change of use from office to permanent residential use.

3.0 BULK, DESIGN & CHARACTER

Existing Building Character and its relationship to that of the Conservation Area.

- 3.1. The existing building is located within the Hatton Garden Conservation Area, to which it makes a positive contribution, though it is not statutorily listed. It is of 3 stories of brickwork to the front and 4 to the rear, as the rear ground level is 1 storey lower than the front.
- 3.2. The Hatton Garden Conservation Area Statement ('HGCAS') refers to this strong enclosure and high density character where taller buildings dominate streets such as in Vine Hill. Its steep, narrow and winding nature, culminating in a dead-end save for a pedestrian exit, is typical of similar roads in the immediate area that were also built in the medieval period. The overall character of the area is one of a combination of styles; it is in this heterogeneity of different styles, functions and scale that makes up the overall character of the area. The HGCAS refers to the contrasts in scale and character between buildings in the area of different periods, styles and functions, which contrasts are generally (though not always) beneficial in a complimentary manner.
- 3.3. The existing building front elevation is of London yellow stock brickwork with symmetrical red rubber brick arches, a stepped parapet, and a considered arrangement of timber double hung sash windows. The overall sophistication of design of this front elevation produces the ornate character which makes the positive contribution to the Conservation Area character referred to in the Hatton Garden Conservation Area Statement.
- 3.4. The existing building is considerably lower than other buildings on each side and others in the area, by at least 2 stories of height. Because the immediate buildings on each side are so much taller, the existing building has a sense of being a little dwarfed by them.
- 3.5. That sense of being dwarfed is not particularly detrimental at the front, as the front elevation ornate design character of this building follows the similar ornate gothic design of its immediate much larger neighbour to the north (no 18), and this similarity of architectural language creates a complimentary dialogue between the two. The building immediately to the south at Nos. 8-14 also has a strong character and massive presence, albeit that the style is of the 20th century with large industrial steel windows with a huge barrel vault roof, which - because of the narrowness of Vine Hill - is not so readily apparent.
- 3.6. By contrast, the rear elevation of this building is very plain; it is of grey stock brick set under a pitched parapet with an uncoordinated and disparate mixture of window openings and styles. The overall design is of little merit in itself; the size, shape and cluttered openings and window styles makes the building appear ungainly in relation to the character of the immediately surrounding context of plain, regular, rectilinear, massive industrial character buildings. In particular, the pitched gable end, sandwiched between its massive neighbours is an uncomfortable relationship; here the contrasts of height are detrimental to the overall character rather than beneficially complimentary as is the case at the front.
- 3.7. The rear of the building is set a fair distance back from the nearest road, Eyre Street Hill, and is separated by a car park belonging to the neighbouring building. The character of the neighbouring buildings around the yard is a mix of styles and periods (Georgian, Victorian and contemporary), some of which have a negative impact on the overall character. The large 20th century rear extension to no 18 is particularly unfortunate as the photograph of the buildings behind the car park attached shows. The general theme that may be deduced of the buildings in this locality off Eyre Street Hill, are buildings of a monolithic, rectilinear, industrial, massive brick quality.

Proposed Character

Front Elevation

- 3.8. The proposal preserves the historical features and character of the front elevation.
- 3.9. Up to the gable level, no changes are proposed. At gable level, the proposed glazed roof extension is strongly set back behind the ornate stepped gable and therefore hardly visible at the front. The design proposal plays upon the strength of character of the existing red rubbed brick arched opening within the gable by removing some of the brick infill within the upper part of the arch. This beneficially enhances the presence of this design feature, and at the same time provides a focal point of visual depth. Such a 'playing off' the ornate arched opening is reminiscent of the original architect's original un-built design which included an oculus window above the arched opening.



Fig 1 Photo of Existing Front Elevation



Fig 2 Visualisation showing Proposed Front Elevation

Rear Elevation (visible across car park from Eyre Street Hill):

- 3.10. The proposal alters the rear elevation in a manner that preserves its character.
- 3.11. The design of the new rear extensions at ground, first and second floor levels (taking the lowest floor as being 'ground', albeit that is truly the 'lower ground' as referenced from the entrance level at the front) is one that seeks to reflect the simple, crude, rectangular, monolithic brick approach of the nearby industrial character. A plain dark brick façade, separated from the existing rear wall by simple full height glazing with black steel balustrades, encloses the rear elevation.
- 3.12. At roof level, the existing brick gable to the original roof is retained, behind which has been inserted a fully glazed set back floor. This set-back glazed floor would be visible from the long view across the car park from the street at Eyre Street Hill. It sits as a lightweight and subordinate in-fill behind the brick gable whose presence is barely noticed by contrast with its dominating neighbours.



Fig 3 Photo of Existing Rear Elevation



Fig 4 Visualisation showing Proposed Rear Elevation

Bulk & Character and their relationship to Strategic Approach to Growth

- 3.13. The HGCAS refers to the character of high density and of a dominating bulk of buildings in this locality. Maximising the density of development on this site is not only in keeping with this aspect of the character cited in the HGCAS, it is also supported by Camden Core Strategy policies that seek to promote growth, to situate that growth in locations that include Vine Hill, to make maximum use of development land particularly if more permanent housing is created thereby.
- 3.14. This strategic policy thrust is set out in CS1 - Distribution of growth (Overall approach to growth and development) which affirms that Camden "*will promote appropriate development at other highly accessible locations, in particular (areas that include) Central London*" in order to achieve or exceed the strategic target for the creation of permanent dwellings, CS3 confirms that Vine Hill is within a highly accessible area and reinforces this thrust. CS1 further reinforces the point by affirming that **"The Council will promote the most efficient use of land and buildings in Camden by seeking development that makes full use of its site, taking into account quality of design..."** Paragraph 1.22, which gives further guidance to policy CS1, further notes that in order to '*make the best use of Camden's limited land*', the Council wants to encourage developments with high densities in the most accessible parts of the borough which is defined as including this site in Central London.

Summary Conclusion on Bulk, Design and Character

- 3.15. The alterations and proposed extensions are sensitively designed so that:
- (i.) There is no impact on the character of the front elevation that makes its positive contribution to the character of the conservation area,
 - (ii.) The impact upon the character of the conservation area when viewed from the rear is minimal. The features of this building as viewed from the rear does not contribute positively to character of the area, which is informed by a jumble of ad-hoc extensions and alterations adjacent on each side of no particular design merit.
- 3.16. In summary, the proposal preserves the character of the building and of the Conservation Area whilst making a much better land use of the site. It successfully fulfils the balancing requirements of Core Strategy CS4 (Promoting high quality places and conserving our heritage) and DP25 (Conserving Camden's heritage) with that of CS3 (Promotion of appropriate development in this highly accessible area.)

4.0 IMPACT OF THE PROPOSALS UPON NEIGHBOURS.

- 4.1 Proposed alterations are designed with regard to the provisions of Policy DP26 ('Managing the impact of development on occupiers and neighbours'). Third story development is set back behind the existing brick parapet creating little variation to the existing obstruction of daylight or sense of enclosure perceived from the surrounding properties. Sky views are further preserved by the decision to limit the rear extension to 3 storeys.

It is of note that the majority of the surrounding buildings are non- residential and therefore windows serving these premises do not carry the same protection in terms of light and privacy as for those serving habitable rooms. The exception is no. 11 Eyre Street Hill which has planning permission for redevelopment for use as live work accommodation. In terms of overlooking, the acute angle of view and disposition of a non-habitable stairwell at the nearest end of the building means that the proposed alterations at no. 16 will have negligible impact upon the perception of privacy within the building.

A 2m louvered privacy screen (which mirrors the treatment of the steel balustrades and yard boundary fence) is provided in order to visually separate the level 2 terrace amenity from the adjacent paved roof space at no. 18 Vine Hill.



Fig 5 Plan showing relationship with surrounding development

5.0 ACCESS (Lifetime Homes)

5.1 The proposal fulfils all the standards set out in Lifetime Homes, as far as this is practicable in the given circumstances of the existing building, as follows:

(i.) *Design Criteria 1 Car Parking Width/ 2 Access from Car Park:*

No car park or possibility of creating any and therefore not applicable.

(ii.) *Design Criteria 3 Approach Gradients/ 4 Entrances / 5 Communal Stairs and Lifts/ 15 Window Specification:*

It is not possible to adapt the building due to the restrictions of the existing condition. The entrance to the existing ground floor is raised one step from the street level and this cannot

practically be changed. The proposal does not worsen the situation in respect of these LTH standards.

(iii.) *Design Criteria 6 Doorways and Hallways:*

It is not practicably possible to widen the staircase and adjacent communal corridors to the lifetime homes standard of 1200 mm due to tight existing floor space and the need to maintain the existing arrangement of load bearing walls around the staircase. However, the clear openings to the flat's doorways which come off the communal corridors are widened from approx 700 mm to 825 mm which a wheelchair would be able to pass through. All new corridors within the flats are more generously proportioned.

(iv.) *Design Criteria 7 Wheelchair Access:*

Wheelchair access is restricted due to the existing ground floor not having level access from the street. Furthermore, the very small interior floor-plate precludes the incorporation of a lift.

(v.) *Design Criteria 8 Living Room:*

All living space is provided at the flat entrance level with the exception of the top flat where the opportunity taken to utilize the new top floor with its terraces prevents this. As there is no possibility to get any disabled access up the 3 flights of stairs to the flat entrance door anyway, this criteria becomes irrelevant.

(vi.) *Design Criteria 9*

Entrance level bed-space: achieved across all units

(vii.) *Design Criteria 10 Entrance Level WC and Potential Shower Drainage/ 14 Bathroom Layout:*

Since the proposal is unable to meet criteria 7 by reason of the characteristics of the existing building, all bathrooms are designed for ease of use by the ambulant disabled but do not include space for wheelchair manoeuvre. A WC with drainage provision is incorporated at the entrance level of all units.

(viii.) *Design Criteria 11 Bathroom and WC Walls/ 12 Through-floor lift/ 13 Tracking Hoist Route/ 16 Controls Fixtures and Fittings:*

All detailed provisions will be incorporated during the post planning design stage

- 5.2 In conclusion, all that can practicably be done given the restrictions of the existing building have been fulfilled and as a consequence, the proposal satisfies the requirements of DP6 (Lifetime Homes and wheelchair homes).

6.0 SUSTAINABILITY

Climate Change and Energy Use

- 6.1. Core Strategy policy CS13 (Tackling climate change through promoting higher environmental standards) requires all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.2. Of the various measures set out in CS13 by which this is to be achieved, of relevance are the requirements to ensure developments use less energy, generate renewable energy on-site; and to ensure the building is designed to minimise the effects of climate change. However, the policy also recognises that it is not always financially feasible to do as much as one would like and CS3 confirms that Camden will have regard to the cost of installing measures to tackle climate change.
- 6.3. Paragraph 13.11 of CS13 provides guidance that developments should achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation (which can include sources of site-related decentralised renewable energy) unless it can be demonstrated that such provision is not feasible. This would appear to be the case in respect of this development: a

preliminary renewable energy study has been carried out into the possible use of renewable energy sources: ground and air source heat pumps, wind, bio-mass boilers, photovoltaic cells and solar thermal panels. The use of PV cells and solar thermal panels were ruled out because of the overshadowing of the roof by the much taller adjacent buildings and also that the available roofspace is productively used as a green roof in accordance with the DP22 requirement. Other sources were ruled out because the small size of the development made the cost prohibitively expensive.

- 6.4. The requirements of DP22 (Promoting sustainable design and construction) relating to achieving Code for Sustainable Homes and Eco-Homes standards do not apply to this development as it is neither a new build nor is it for a development of 5 homes or more. As this development is neither of 5 dwellings or more, nor of greater size of 500 sq m, the requirement in Camden Planning Guidance CPG3 (Sustainability) to provide a energy statement to demonstrate how carbon dioxide emissions will be reduced also would not apply.
- 6.5. However, given the restrictions herein referred to, this development has been designed to minimise carbon dioxide emissions by being as energy efficient as is feasible and viable.
- 6.6. An energy efficient integrated approach to the design which takes account of solar gain, access to daylight, insulation, thermal materials, ventilation, heating and control systems has been incorporated. Advantage has been taken of the overshadowing by the tall adjacent building to the south to provide a large rooflight on the top floor to allow copious amounts of daylight within without creating a particular source of solar gain. Furthermore, large sliding screens have been incorporated at both ends of the top floor, to create as all the necessary through draught to cool this top floor. This approach thus complies with the paragraph 13.12 of CS13 requirement for developments to incorporate measures to combat demand for electricity for cooling given expected hotter temperatures.
- 6.7. The Camden Planning Guidance CPG3 (Sustainability) guidance that all new developments should comply with the London Plan requirement to reduce carbon dioxide emission to make a 25% improvement on the current 2010 Building Regulations and to achieve the U value standards set out in paragraph 3.22 of CPG 3 does not apply to this conversion of the existing building. Nonetheless, the detailed design of the scheme (once that is developed) will, as far as is practicable, seek to achieve these standards. In any event, there will be radical improvements to the existing building and at least 10% of the project cost would be spent on such improvements. The detailed specification will provide:
 - *Heat loss measures:* high amounts of wall and roof insulation to meet para 3.22 standards, low emissivity glass high performance timber windows and doors, to achieve at least 1.8 if not 1.5 U value as in para 3.22 standards, incorporating a high degree of draft proofing,
 - *Heat supply systems:* High efficiency (95+%) gas fired boilers with under-floor heating & cooling systems and room temperature control systems to minimise the energy use
 - *Lighting efficiency measures:* zoned lighting, heating and cooling with individual control, appliances to be A+ rated, and energy monitoring, metering and controls incorporated.
- 6.8. In summary, the design of the development and the further measures to be taken in the detailed design will meet or exceed the requirements of CS13, DP 22 and CPG 3.

Travel

- 6.9. This is a zero-car development. A secure cycle storage room is incorporated accommodating 4 cycles. It is highly accessible from several bus routes on Clerkenwell Road and to the underground and national rail services.
- 6.10. Accordingly this proposal complies with CS11 (Promoting sustainable and efficient travel).

Waste and Recycling

- 6.11. It is not practical to create waste and recycling storage and collection facilities that are directly accessible from the street; the insertion of any new doors in the front elevation would damage its iconic character and the tightness of the internal floor would also preclude its inclusion. At present the waste from the office that has occupied this building is currently left in bags on the street and collected by Camden a daily basis.
- 6.12. It is proposed that waste would continue to be stored within the building, and put out on the street as is done now. Within each flat, there is a dedicated cupboard able to house general rubbish, paper and plastic recycling containers.
- 6.13. Accordingly, the proposal fulfils CS18 (Dealing with our waste and encouraging recycling) as far as is reasonably practicable.

Sustainable Urban Drainage

- 6.14. The proposal incorporates a sustainable modular green roof system on the solid areas of roof in order to promote biodiversity and reduce demand on the existing drainage and sewer system.
- 6.15. Accordingly, this proposal fulfils the requirements of CS13 (tackling climate change) which requires the inclusion of a drainage system that prevents or mitigates local surface water flooding.

7.0 TRANSPORT AND PARKING CONSIDERATIONS

- 7.1 There are no off street car park spaces associated with this development, and as such the proposal fulfils DP16 (The transport implications of development) which encourages the use of cycling and use nearby public transport links and DP18 (Parking standards and limiting the availability of car parking).
- 7.2 The proposed development has no material impact on current transport in the area due to its small scale of development, and there are therefore no other measures to be taken to fulfil DP19 (Managing the impact of parking).
- 7.3 The proposal incorporates storage for no.4 cycles (one per unit) in an internal, safe, secure room and as such the proposal fulfils DP17 (Walking, cycling and public transport.)

8.0 HOUSING MIX

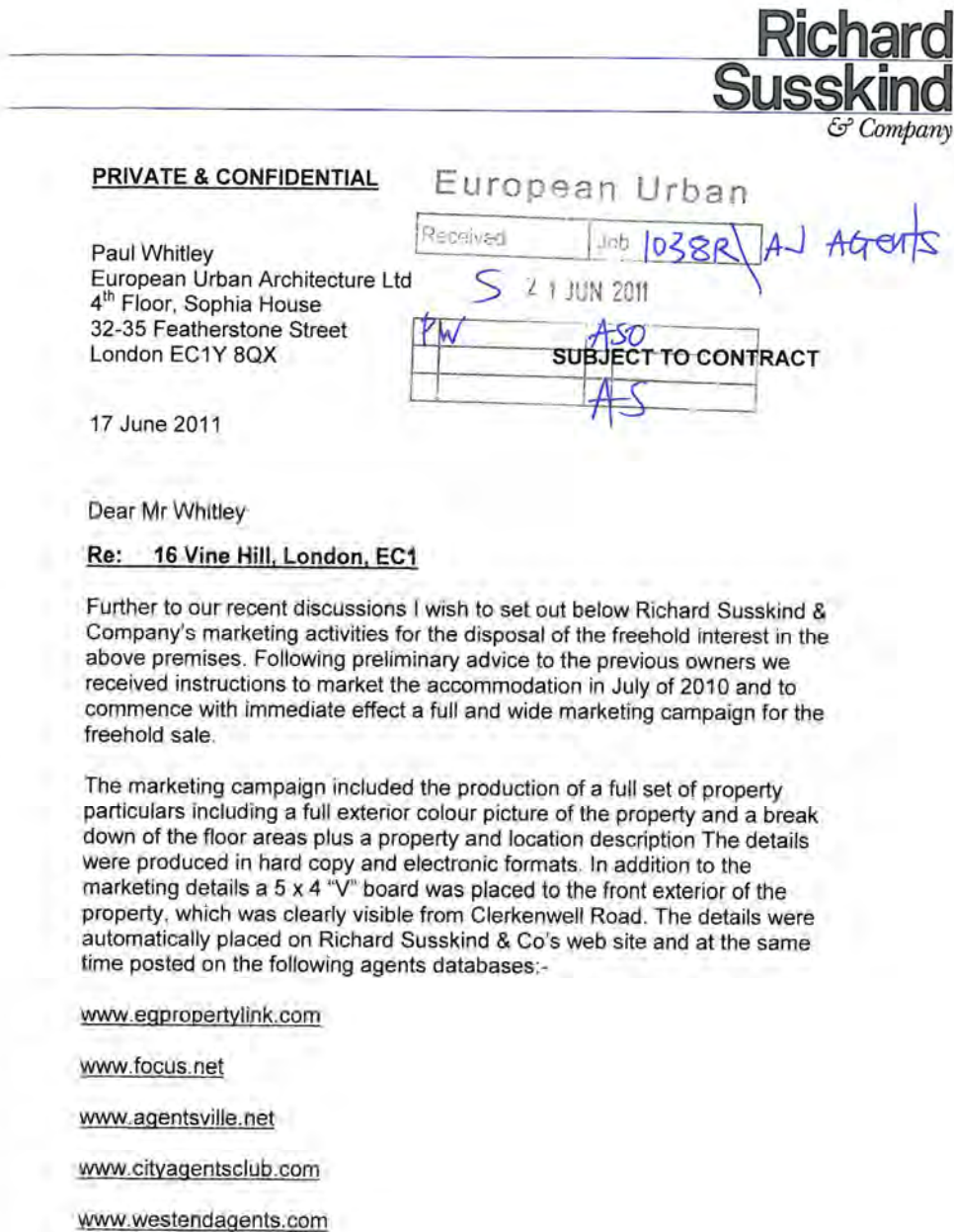
- 8.1 The proposal provides a mix of 1 and 3 bedroom flats, all with private amenity space.
- 8.2 Accordingly, the proposal fulfils the requirements of Core Strategy policy CS6 and Development Policy DP5 seeks to secure mixed and inclusive communities and a range of self-contained homes of different sizes.

9.0 CONCLUSION

- 9.1 The development complies with all relevant Camden policy and should be granted consent.

10.0 APPENDICES

10.1 Letter from Ashley Goodman of Richard Susskind and Company outlining details of marketing campaign for the freehold sale of office space.



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No. 2377144

Hard copy marketing details were also sent to over 500 City and West End commercial agency practices for the attention of the office agency departments and there retained in-house clients via the EACH distribution service. A local canvass was also co-ordinated with details of the property sent to a number of local occupiers for their consideration.

As a result of our extensive marketing campaign we carried out a number of inspections with a wide range of potential business occupiers. In spite of receiving a good level of interest in the property no offers were received. In an effort to receive interest for the property nearby local occupiers were continually provided with details of the building. All active enquiries registered on our database seeking buildings of a similar description were contacted and provided with details of the accommodation on a daily basis.

Whilst talking to numerous business occupiers we received a growing number of enquiries from parties looking at the building for alternative uses, namely residential use. Of the business occupiers who considered the building for their own occupation the vast majority could not make the building work for them on a practical basis largely due to the number of floors the building is arranged over and to the extent of the accommodation arranged in the basement level with limited natural light. Furthermore the smaller upper floor areas proved unattractive to potential business occupiers providing them with limited flexibility. Another factor that caused great concern to business operators was the absence of a lift in the building and narrow landings and common parts making wheelchair access virtually impossible and therefore making the building non DDA compliant.

In spite of all our efforts we were unable to identify a single party, in the nine months of marketing, prepared to occupy the building as commercial premises. In March of this year we obtained several offers for the freehold interest from parties wishing to change the use of the building away from offices space. On the 18th May we completed contracts for the sale on behalf of our clients to the current owners.

I trust the above information is useful for your purposes and should you require any further information please do not hesitate to contact me.

Kind regards



ASHLEY GOODMAN

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