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|--|---|----------------------------------|---------------|
| Address: | Suffolk House, 1-8 Whitfield Place & 114-116 Whitfield Street London W1T | | 011009 |
| Application Number: | 2009/2966/P | Officer: Barrington Bowie | |
| Ward: | Bloomsbury | | |
| Date valid: | 29/07/2009 | | |
| <p>Proposal: Proposed partial demolition, refurbishment, re-modelling and 4th floor extension to building on site to provide 13 residential units (Class C3) in addition to associated existing office floorspace (Class B1) plus associated works. [The provision of off-site residential accommodation at Suffolk House, Whitfield Place instead of at Asta House, Whitfield Street associated with the redevelopment of Howland House, Fitzroy Street as office headquarters].</p> | | | |
| <p>Drawing Numbers:</p> <p>PLANS Existing: Prefix P155_2:- Other Plans 01 Site & Location; Floor Plans 20 Basement; 21 Ground; 22 First; 23 Second; 24 Third; 25 Fourth; 26 Roof; Elevations 27 North; 28 South; 29 West; Sections 30 Section 1 31 Section 2</p> <p>Proposed: Prefix P155_2:- Floor Plans 02 Basement; 03 Ground; 04 First; 05 Second; 06 Third; 07 Fourth; 08 Roof; Elevations 09 Northwest; 10 Southeast; 11 Southwest; 12 Northeast;</p> | | | |

Elevations
09 Northwest;
10 Southeast;
11 Southwest;
12 Northeast;
Sections
13 Section 1;
14 Section 2;
Detailed extracts, elevations and sections
15 Northwest
16 Southeast;
17 Southwest;
18 Detailed section;
19 Detailed section of roof extension;
Alteration Plans
32 Basement;
33 Ground;
34 First;
35 Second;
36 Third;
37 Fourth;

SUPPORTING DOCUMENTS

Air Quality Assessment (Arup, June 2009)
Daylight/Sunlight Assessment (Drivers Jonas, June, 2009)
Design & Access Statement (DSDHA, June 2009)
Environmental Noise Survey and PG24 Assessment (Hann Tucker Associates, June 2009)
Historical, Architectural and Conservation Assessment (Richard Coleman, June 2009)
Planning Statement (DP9, June 2009)
Sustainability and Energy Statement (Arup, June 2009)
Transport Statement (June 2009)

RECOMMENDATION SUMMARY: GRANT PLANNING PERMISSION subject to conditions and S106 legal agreement

| | |
|-----------------------------|--------------------|
| Related Application? | 29 July 2009 |
| Date of Application: | |
| Application Number: | 2009/2964/P |

Proposal: Construction of two-storey office extension (Class B1) and associated works.
as shown on drawing numbers

RECOMMENDATION SUMMARY: [Click [here](#) and type]

| | |
|--|--|
| Applicant: | Agent: |
| Central London Commercial Estates Ltd c/o Agent | DP9 100 Pall Mall LONDON SW1Y 5NQ |

ANALYSIS INFORMATION

| Land Use Details: | | | |
|-------------------|-----------|-------------------------|---|
| | Use Class | Use Description | Floorspace |
| Existing | B1 | Business | 1930m ² |
| Proposed | C3 B1 | Residential Business | 1927m ² 248m ² |

| | Residential Type | studio | 1-bed | 2-bed | 3-bed | 4-bed+ | Total |
|--------------------------|---------------------------|--------|-------|-------|-------|--------|-------------|
| Existing | N/A | | | | | | Nil |
| Proposed | Flat/Maisonette | 1 | 1 | 7 | | | (9) |
| | MARKET AFFORDABLE: | | | 2 | | 2 | (4) |
| | Social Rented | | | | | 2 | 2 |
| | Intermediate | | | 2 | | | 2 |
| Total residential | | | | | | | (13) |

| Parking Details: | | | | | | |
|------------------|-----------------|-----|------------------|-----|-------------|--------|
| | CAR | | | | BICYCLE | |
| | OFFICE | | | | OFFICE | |
| | General parking | | Disabled parking | | | |
| Existing | Nil | | Nil | | | |
| | RESIDENTIAL | | OFFICE | | RESIDENTIAL | OFFICE |
| Proposed | Gen | Dis | Gen | Dis | | |
| | Nil | Nil | Nil | Nil | 20 | Nil |

OFFICERS' REPORT

Reason for Referral to Committee:

The proposal is a major development involving the construction of ten or more new dwellings under "Matters delegated to the Development Control Sub-Committee" paragraph 3(i), and involves the signing of a section 106 legal agreement.

The Committee is also advised that the development is categorised by the Department of Communities and Local Government as a major development – one that should be determined within 13 weeks. The statutory expiry date is **16 October 2009**.

1. BACKGROUND

- 1.1. **The matters the subject of this application (Suffolk House - ref: 2009/2966/P), are directly related to the matters the subject of the next agenda item (Asta House - ref: 2009/2964/P);** thus the matters set out in both reports should be considered simultaneously. The applicant seeks to transfer the outstanding planning obligation from Asta House to Suffolk House. This requires applications for residential use at Suffolk House and business use at Asta House.
- 1.2. The submitted proposals are closely linked to a previous consent at Howland House, 2-6 Fitzroy Street (ref: 2005/4097/P) which granted permission for redevelopment to provide offices (Class B1). Part of the s106 obligation required the residential component of the proposals to be provided off-site at Asta House, 53-65 Fitzroy Street (ref: 2005/4099/P). The Asta House site is also the subject of an extant permission (a resubmission of 2005/4099/P) that was granted for the erection of two additional floors and partial change of use from B1 office to form 13 self contained residential units (ref: 2007/2280/P). That proposal is has not been implemented.
- 1.3. The applicant now considers that the off site housing would be better located at Suffolk House, Whitfield Place. The current application proposes the 'transference' of the s.106 obligation under planning permission reference 2007/2280/P (requiring the delivery of residential units) from Asta House to Suffolk House. A deed of variation would also be required in order to transfer the residential obligation to the application site at Suffolk House. This proposal would incorporate the erection of a 4th floor extension and a small element of commercial floorspace – App No, 2009/2966/P).
- 1.4. At Asta House, the applicant is concurrently seeking planning permission for the construction of the two additional floors for B1 offices rather than residential as approved. This is the subject of a linked, but separate report on this agenda (App. No, 2009/2964/P).

2. SITE & CHARACTERISTICS

- 2.1. The site includes three buildings which are currently in B1 office uses, comprising 1,930sqm of floorspace. Suffolk House (1-8 Whitfield Place)

forms the largest part of the site. 116 Whitfield Street is a separate property but is part of the same building. The property is in a poor condition, having been left vacant for a number of years. 114 Whitfield Street is a two storey post-war building, attached to the southern side of Suffolk House and fronting Whitfield Street.

- 2.2. The site's primary building, Suffolk House, is located within the Fitzroy Square Island of the Bloomsbury Conservation Area. It fronts on to the south side of Whitfield Place playground, an open square of Georgian origin that originally held a market. The square was built over sometime before 1870 and was reinstated as first a car park and then a playground in the 1950s and 60s. Whitfield Street on west side of the square is characterised by Georgian styled terrace houses. Some are original (numbers 131-137 opposite the site are listed Grade II) others are late twentieth-century replicas. The north side of the square is abutted by late 20th century modern houses in brick. The east side of the square is adjoined by the rear elevation of a hotel, five and half storeys high, and unsympathetically treated with poor window detailing and painted brickwork.
- 2.3. Suffolk House itself is a late nineteenth-century industrial building with a brick elevation and stripped classical composition compatible with the Georgian terrace origins of the conservation area. It is four storeys high rising to five at Whitfield Street. Immediately to the rear (southeast) of the building is a terrace of seven terrace houses fronting Grafton Way, of which six are listed (52-56, 60-62 at grade II, and 58 at grade II*), and the rear of these buildings form the context to the rear of Suffolk House. They are four storeys high with a consistent parapet line to the front and butterfly roof to rear.
- 2.4. Suffolk House positively contributes to the character and appearance of the Bloomsbury Conservation Area. Replacement UDP policy B7B seeks to retain any positive contributor. Any substantial demolition would require justification through a PPG15 test. Furthermore, within the wider area, Fitzroy Square is of significant value as a heritage asset.

3. THE PROPOSAL

- 3.1. It is proposed to retain the existing buildings and convert them into a residential use. This process would involve the retention of much of the existing building fabric, with retention of the floors, principal cross-walls, staircases and window openings. It is also proposed to repair and clean the exterior of the buildings. The conversion of the building to a residential use would involve the introduction of an additional storey to the four storey part of Suffolk House along Whitfield Place, so that the building is consistently five storeys high.
- 3.2. The extended Suffolk House would accommodate 13 residential units (nine market and four affordable) and a small amount (248sq m) of commercial floorspace. The extension would provide a modern interpretation of the butterfly roof, which forms a key feature of the surrounding area. The extension would be lightweight in construction and treatment to create a structure that compliments the form of the existing building, and which also responds to the neighbouring buildings, the conservation area, and the adjacent listed buildings.

- 3.3. The proposed design approach comprises inflected windows on the rear (southeast) elevation, with attached first and second floor walkways/access decks protected by a 1.6m louvered guardrail/screen. This design solution seeks to minimise the quantum of internal circulation residential floorspace.
- 3.4. The converted and extended Suffolk House would accommodate: the two 5-bed social rented units within the ground and first floors; a 2-bed market unit at 1st floor; and six 2-bed market properties at 3rd and 4th floors. The social rented units would be accessed individually from Whitfield Street and each would have own private amenity area. Dedicated pedestrian access is provided at ground floor for the remaining units; the one proposed at the easternmost part of the building would be for the two second floor 2-bed intermediate units, whilst the entrance at the western end would secure access to all nine market units. 248sq m of business floorpace would be provided within the basement and ground floor of 114-116 Whitfield Street.
- 3.5. All residential units would have access to either private or shared amenity spaces. All the affordable units would have associated private amenity space, whilst 6 out of the 9 market units would be provided with private amenity – the remaining 3 units would have access to a shared terrace.

4. **RELEVANT HISTORY**

- 4.1. 1951 - PP for the erection of a building for office and showroom use;
1977 - PP c/u to provide office/warehouse on the first floor and office on the second floor;
1982 - PP to use the basement as a 'training centre for information technology';
1985 - PP c/u of ground floor from showroom to light industry/office use;
1991 - PP for continued use of the building for office use incorporating the erection of a glass mansard roof;
1998 - PP erection of a fourth floor for office use – not implemented;
1998 - PP for external alterations associated with the provision of a lecture theatre, ancillary to the office use of the building, on the ground floor. The installation of new entrance canopy and screen, together with sliding doors at ground floor level.
2000 - PP for the retention of three condenser units, the installation of an emergency standby generator and ventilation duct, subject to a condition that the standby generator be noise attenuated;
2000 - PP for the removal of the condition in respect of the standby generator;
2003 - PP for the extension of the time limits condition for the 1998 permission for a fourth floor (see above); and
2004 - PP for the extension of the time limits condition for the 1998 permission for external alterations, entrance canopy and screen.
2005 - Refusal of PP for security spikes to a parapet facing Charlotte Mews on ground of the detrimental visual impact.
- 4.2. In more recent years, two planning permissions connected by a Section 106 agreement were granted and are particularly relevant to the determination of this application. Both permissions were granted on 22 December 2005 and relate to:

a) Redevelopment of a site bounded by Whitfield Street, Howland Street and Fitzroy Street with a 6-storey building for use as the ARUP head office (2005/4097/P); and

b) Erection of two additional floors and the partial change of use from office (Class B1) to form 13 self-contained flats for residential use (Class C3) (2005/4099/P).

4.3. Scheme a) above has been implemented, but scheme b) has not, despite a re-submission of that permission, which was approved in August 2007 (2007/2280/P).

4.4. It is now proposed to re-locate the office floorspace currently within Suffolk House to Asta House, whilst re-accommodating the residential within Suffolk House.

5. CONSULTATIONS

5.1. The following responses have been received.

Conservation Area Advisory Committee

5.2. Bloomsbury CAAC:

No comments received at time of writing.

Local Groups

5.3. Friends of Open Spaces in Fitzrovia

Object to proposals on following grounds:

- Amenity of future occupiers of residential element would be compromised by proximity to ball court area, through noise and disturbance and floodlighting.
- Potential loss of daylight/sunlight to open space as a result of proposed additional floor

5.4. Fitzrovia Play Association

Object to proposals on following grounds:

- Potential loss of daylight/sunlight to open space as a result of proposed additional floor
- Noise and disturbance to future occupiers of proposal due to proximity to existing ball court/playground activities
- Introduction of residential inappropriate at this location due to ball court
- Potential overlooking of ball court/playground

Adjoining Occupiers

5.5.

| | |
|---------------------------|-----|
| | |
| No. of Letters Sent | 132 |
| No. of responses Received | 9 |
| Number of Objections | 6 |
| Number of Support | |
| Number of comments | 3 |

As a result of a full neighbour notification, a total of 6 objections were received, including comments from local interest groups.

Planning grounds of objection:

Matters of principle:

- * Asta House more suitable for residential than Suffolk House
- * Unnecessary additional residential, would lead to overcrowding of northern part of Whitfield Street
- * Building should remain in office use

Design/architectural impact matters:

- * Inappropriate design, incompatible with character of area
- * Adverse impact on the character of conservation area
- * Critique of architectural approach, style and form in terms of : impact on conservation area, listed buildings, ball court/play area and surrounding area and therefore harmful to character and appearance of conservation area
- * Critique of architectural detailing (e.g. external walkways, screening)
- * Unsympathetic rear elevation
- * Fourth floor extension insufficiently diffident
- * Inappropriate materials

Amenity matters:

- * Noise and disturbance to future occupiers of proposal due to proximity to existing ball court/playground activities
- * Loss of daylight/sunlight to properties surrounding square
- * Loss of morning sunlight to ballcourt/play area
- * Overlooking of ballcourt/play area
- * Potential overlooking of flats at Whitfield Street (owner of properties Nos 139-143)

Transport/traffic matters:

- * Traffic generation/access problems arising from development
- * Proposal would exacerbate existing difficult parking conditions
- * Proposal would place pressure on refuse collection/recycling

Environmental health matters:

- * Noise nuisance arising from demolition/construction, with limited on-street capability to facilitate construction

6. POLICIES

6.1. **Camden Replacement Unitary Development Plan 2006**

SD1 Quality of life (*proposal acceptable*)

SD2 Planning obligations (*proposal acceptable*)

SD3 Mixed use development - *if assessed together with associated commercial proposals (*proposal acceptable in principle if permitted and implemented in full*)

SD4 Density of development (*proposal acceptable*)

SD5 Location of development with significant travel demand (*proposal acceptable*)

SD6 Amenity for occupiers and neighbours (*proposal acceptable*)

SD7 Light, noise and vibration pollution (*proposal acceptable subject to conditions*)

SD8 Disturbance from plant and machinery (*proposal acceptable subject to conditions*)

SD8B Disturbance from demolition and construction (*proposal acceptable subject to s106*)

SD9 Resources and energy (*proposal acceptable subject to conditions and s106*)

H1 New housing (*proposal acceptable*)

H2 Affordable housing (*proposal acceptable subject to s106*)

H7 Lifetime homes and wheelchair housing (*proposal acceptable*)
H8 Mix of units (*proposal acceptable*)
B1 General design principles (*proposal acceptable*)
B3 Alterations and extensions (*proposal acceptable*)
B7 Conservation areas (*proposal acceptable*)
N4 Providing public open space (*proposal acceptable*)
N5 Biodiversity (*proposal acceptable*)
T1 Sustainable transport (*proposal acceptable subject to s106*)
T2 Capacity of transport provision (*proposal acceptable*)
T3 Pedestrians and cycling (*proposal acceptable subject to conditions*)
T8 Car free and car capped housing (*proposal acceptable subject to s106*)
T9 Impact of parking (*proposal acceptable subject to s106*)
T12 Works affecting highways (*proposal acceptable subject to s106*)
E2 Retention of existing business use (*proposal acceptable*)
Appendix 1: Noise and vibration thresholds (*proposal acceptable subject to conditions*)

6.2. **Supplementary Planning Guidance/Documents**

Camden Planning Guidance - adopted December 2006

7. **ASSESSMENT & ISSUES:**

7.1. The principal considerations material to the determination of this application are summarised as follows:

- Principle of proposed use;
- Affordable Housing;
- Mix of unit sizes and internal/external space standards;
- Design, conservation and townscape issues;
- Residential amenity
- Transport and parking/servicing
- Energy, resources and biodiversity
- Other matters – education contributions, noise attenuation, land contamination, safety and security, construction nuisance, sustainable communities/regeneration

7.2. **PRINCIPLE OF PROPOSED USE**

7.2.1. The application includes the change of use of the existing office building to residential use whilst retaining 248sq m of B1 office space. Consequently, the loss of office space must be considered against policy E2, which seeks to protect business floorspace and has a general presumption against the loss of business uses where there is potential for that use to continue. Where it is considered that a site does not have potential to continue the existing business use, consideration needs to be given to maintaining on site an alternative business use, with priority given to flexible space for employment activity within Use Classes B8 (storage & distribution) or B1c (light industry). The policy outlines instances where loss of such uses may be acceptable, such as access issues, lack of service and loading bays, low floor to ceiling heights etc. The policy also allows an exception in circumstances where the loss of space is Class B1 (a) office space and welcomes proposals where the use change is to residential use. Moreover, the introduction of new residential uses is

supported as a 'priority' use in that it contributes to a Borough-wide strategic need for an increase in residential use (see Policy H1). In this instance, the proposals are considered acceptable. Furthermore the business floorspace lost as part of this proposal is more than the net increase in B1 proposed at the related Asta House site, thus the need to provide residential uplift under policy SD3, is not required, as there is no net increase in business floorspace proposed, i.e. less than the 200sq m threshold.

7.3. AFFORDABLE HOUSING

7.3.1. The UDP policy H2 seeks 50% affordable housing (as a target).

Camden Planning Guidance (CPG) provides for this to be calculated by floorspace to achieve large family units in the social rented sector. As a guideline, the policy seeks an affordable split of 70% social rented and 30% intermediate housing. CPG indicates that this may also be calculated by floorspace. Nominations for occupancy and negotiations in respect of unit size need are to be made in conjunction with the Council's Housing Department.

7.3.2. The mix of unit sizes for affordable housing has been agreed with the Housing Department based on an identified need for affordable units suitable for occupation by larger families. The size of the 2-bedroom intermediate 'Home buy' units are 61sq m and 74sq m, with each of the 5-bedroom social rented units approximately 177sq m.

7.3.3. The private residential accommodation would all be provided thus; a 2-bed on first floor, a studio and 1-bed at 2nd floor, with the remaining six 2-beds on 3rd and 4th floors. The two social rented occupy ground and first floors whilst the two 2-bed intermediate units would be located on the second floor.

7.3.4. In terms of the tenure, the private/affordable parts of the scheme represent a (626sq m: 489sq m) 56/44% floor area split. Of the affordable housing proposed, the tenure would be approximately 70% social rent and 30% intermediate 'Home buy'. The offered affordable housing meets the requirement expressed in policy H2 in full and is therefore acceptable in this regard. Control over provision of this accommodation and its future tenure are recommended by s106 agreement.

7.4. MIX OF UNIT SIZES AND INTERNAL/ACCESSIBILITY/OPEN SPACE

7.4.1. The proposal incorporates a suitable mix of unit sizes including 1-bedroom, 2-bedroom and 5-bedroom units. The applicant has undertaken to provide two spacious family-sized units to meet the Borough's housing needs, whilst the 2-bedroom units may also be suitable for occupation by households with children. Consequently, the mix of unit sizes is considered to be acceptable and complies with policy H8.

7.4.2. Accessibility issues

UDP policy H7 states that 10% of properties should be wheelchair accessible and all should satisfy 'Lifetimes Homes' requirements. Two of the units would be wheelchair accessible in accordance with policy. Due to the constraints imposed through working on an historic building that is a positive contributor to the conservation area, there is reduced flexibility for all units to be 'Lifetimes Homes' compliant. Nevertheless, the applicant will seek to meet these standards as far as possible; areas where some of the requirements are unlikely to be met include: standards for stairs where existing stairs are to be and guidance on window cill

heights where the existing window openings are to be retained. A condition to address the extent to which these standards can be satisfied is recommended.

7.4.3. *Open space and new amenity/public space provision*

Policy N4 seeks the provision of public open space or publicly accessible space, particularly green space, in new developments. Eight of the units within the scheme would have their own dedicated terrace/balcony and 4 would share a terrace. However, there is still an open space need generated by the proposal, which would be 261sq m. check). Expressed as a financial contribution this would amount to £21,794, taking into account the capital cost of provision of open space and maintenance for a five-year period. Given the high likelihood that children would occupy the development, it would be reasonable to seek the contribution in this instance, particularly as there is a shortage of open space and the proposal would place pressure on this. The open space contribution can be secured by s106 agreement.

7.5. *DESIGN, CONSERVATION & TOWNSCAPE*

- 7.5.1. This roof extension reads clearly and appropriately, through its materials, form and reduction of scale, as a lightweight attic storey and is the equivalent of a mansard in its relationship with the host building. It imaginatively draws upon the butterfly roof forms of the parallel listed terrace; roof forms of 19C warehouse buildings; and the texture and tone of Georgian attic storeys.
- 7.5.2. On Whitfield Place the roof rhythmically punctuates the skyline drawing the sky down onto the valleys and further into the recessed terraces. A generous shadow detail cleanly addresses the termination of the brick façade. The ridge height of the new attic would finish a storey height lower than the neighbouring existing hotel property located on the east side of the square. At the rear the design sets up a consistent rather than varied rhythm in both height and width. This is considered to successfully respond to the consistent pattern of the listed butterfly roofs and the character they create. The ridge height is also much reduced on this side, in recognition of its context, bringing the ridge line to the height of the new window heads on the front elevation. This is 0.6m lower than the existing five storey parapet on the host building and equivalent to the ridge height of the butterfly roofs on the listed terraces.
- 7.5.3. Detailing has a light touch and is minimal to the point of seeming effortless. Window frames are hidden behind the facade, like those of the neighbouring Georgian terraces. A waterproof membrane seals the extension below the cladding resulting in an external appearance free from any gutters, flashing, coping or other trims and clutter. The cladding material is a cementitious composite board which would seamlessly wrap over the sides and roof planes of the extension. In tone, texture and the narrow dimension the cladding will harmonise with the slates and bricks of neighbouring and host buildings. It has a smooth but tactile surface which allows the natural variegation of the fibre cement finish to be seen through a semi-translucent pigmented coating. Although a modern material, it is considered by its particular use on this proposal, coupled with the high quality of seamless detailing offered, to be appropriate to the character of the conservation area and the setting of the listed buildings.

7.5.4. The flat layouts and access have been thoughtfully designed. Flats are dual aspect. The ground floor maisonettes have generous recessed verandas to the front which act as both a porch and transition to the dwelling and as an additional external space capable of accommodating a table and chairs. There is also a small terrace to the rear. The roof top cladding is employed and ground floor for gates and bin/fire exit doors giving a subtle completeness to the proposal. Upper flats have similar generous porches as well as good terraces. Although small, they are extremely usable, being square in plan with good privacy and weather protection; are easily accessed off the hall; and offer glazing on two sides to both the hall and bedroom. The main bedrooms have windows directed towards Whitfield Street to prevent overlooking onto the Grafton Way terrace. Below, each of the two levels of external corridor has a balustrade similarly angled to direct views and openness towards Whitfield Street.

7.5.6. In summary, the proposal is a considered, imaginative and sensitive extension to a conservation area property of character. The quality of design in regard to both the quality of appearance and consideration as to how the building would be experienced and inhabited is very high. The proposal enhances the appearance of the host building and the conservation area, and is a considered and acceptable response to the setting of the listed buildings and complies with policies B1, B3, and B7 of the Unitary Development Plan.

7.6. RESIDENTIAL AMENITY

7.6.1. The UDP and PPS1 contain design advice that states that good design should be the aim of all involved in the development process.

Furthermore, any proposed redevelopment must not result in a significant loss of sunlight or daylight for any nearby residential occupiers (policy **SD6**) and must demonstrate compliance with the BRE guidelines (Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice by P J Littlefair). It is also important that any new windows, balconies and roof terraces are at least 18m from the nearest existing residential window. Distances of less than this are acceptable for bathroom windows or other secondary windows that can be fitted with obscure glazing, and for roof terraces where a privacy screen can be used.

7.6.2. Impact of development on sunlight/daylight to adjoining properties

In order to establish whether the degree of daylight loss would be materially harmful, an assessment using the quantitative tests of: the Vertical Sky Component (VSC), Average Daylight Factor (ADF) and No-skyline principles, is required. The impact on the daylighting distribution in an existing building can be found by plotting the no-sky line in each of the main rooms (i.e. living rooms, dining rooms and kitchens). Bedrooms should be analysed, although these are less important. If, following construction of a new development, the no-sky line moves so that the area of the existing room that doesn't receive direct skylight is reduced to less than 80% of its former value, then this will be noticeable to the occupants according to the BRE.

7.6.2. Daylight

A BRE sunlight and daylight report commissioned by the applicant assesses the impact of the proposal on the neighbouring residential

properties at: In general, the impact is negligible, and in terms of VSC, for the Whitfield Street properties, the habitable room windows at first floor would experience a 0.02% reduction in daylight (the worst reduction being from 25% to 24.5% VSC 131 Whitfield Street. As far as, the habitable room windows in Grafton Way are concerned, those that are most likely to be affected are those from basement to 3rd floor at No 60. The 3rd floor window at 64 Grafton Way would suffer no loss of daylight in terms of the VSC calculation. The basement and ground floor windows would experience slight reductions in daylight levels within the tolerance band. The first and second floor windows would fail in terms of VSC. However, in terms of the ADF the identified rooms (both bedrooms) would retain satisfactory levels of internal daylight.

7.6.3. ***Sunlight***

The BRE guidelines specify that only those windows within (i.e. facing) 90 degrees due south of a proposal are relevant in terms of sunlight assessment. This excludes from analysis the habitable room windows surrounding the application site.

6.4.6. ***Overlooking/privacy issues***

There are no significant overlooking issues arising between the development and properties at Grafton Way to the rear. There would be a 12 m distance between the facing elevations of the development Nos. 133 and 135 Whitfield Street opposite, which is less than 18m considered in ideal in Camden's Planning Guidance. However, these properties are separated from the development by an adopted vehicular highway (Whitfield Street) which is considered intervening public realm, and would have the effect of physically separating the proposals to a satisfactory degree. In this instance, overlooking from the street would not be a compelling reason for objection, given the urban context and government advice contained in PPS3.

7.6.5. ***Amenity within the development***

There would be no habitable room windows facing each other within the development.

7.6.6. BRE itself states that its guidelines need to be applied sensibly and flexibly. Moreover, these are national guidelines and account must be taken of local factors. In this well developed location, residents would naturally have an expectation of compromised amenities in certain respects, as a trade-off for the convenience of living in or near central London. For this reason it is considered that failings in meeting the BRE guideline criteria can be tolerated to a greater extent than elsewhere. Furthermore, future residents would be cognisant of the proposed residential layout and make informed choices as a consequence.

7.6.7. Concerns have been about the design and form of the roof extension and its potential to harm the character and appearance of the conservation area. The roof extension would be a storey lower than the neighbouring hotel and not significantly higher than the existing tallest part of the host building. Both the butterfly forms and the recessed terraces draw the skyline down into the building, increase visual depth

would allow light through to the square. The method of construction, with a fully sealed membrane below the cladding, allows the extension height to be kept down, with no requirement for an upstand. The form of the roof also reduces the visual impact and bulk that a traditional mansard would present.

- 7.6.8. English Heritage's Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment states in Principle 4.6 that "new work should aspire to a quality of design and execution which may be valued both now and in the future. This neither implies nor precludes working in traditional or new ways, but should respect the significance of a place in its setting". The proposal is fully in accordance with this principle. It is a thoughtful, imaginative and technically sophisticated piece of design which is sympathetic to its setting and enhances the host building. In scale, tone and level of detail it is appropriate. It sensitively re-imagines many of the valued characteristics of historic roof forms through its recessive form; landscape quality; lightness of construction; and subdued materials and detail.
- 7.6.9. The balustrade uprights on the walkways are angled like louvers so that they are minimal in width and impact as viewed from the public realm, but restrict overlooking into the Grafton way properties. Their colour, proportion, detailing and muted tone will help fade them into their background context of brickwork.
- 7.6.10 The architectural objector is concerned about the visibility of the proposed roof extension. Nevertheless, unlike the butterfly roof of the Imagination building, which is visible from the public realm in Bedford Square, this proposal will not be visible over the rooftops of the Grafton Way listed buildings. The proposed roof form to the rear of Suffolk House responds well to the butterfly roof forms to the rear of Grafton Way in scale, tone and rhythm.

7.7. TRANSPORT AND PARKING

- 7.7.1. The proposed 13 residential units would not have any associated general needs car-parking within the site. However, the site is suitable for car-free as it is well located for public transport and local services. There is also a CPZ covering the surrounding streets with demonstrable parking stress. As the site lies within a clear zone and is highly accessible by public transport, it is recommended that a s106 agreement be concluded requiring that the development be car-free. In the event that the applicant is either unwilling or unable to conclude the agreement within the 13-week period, a second recommendation is included setting out the reason for refusal.
- 7.7.2. As the development would have an impact on its surroundings; and due to the need to limit and formalise access and servicing arrangements, it is acknowledged that the scheme will require highways works to reduce the residential parking bay on Whitfield Street to 22m in length. This can be secured as part of the s106 agreement.
- 7.7.3. **Cycle parking**
Camden's Parking Standards for cycles (*Appendix 6 of UDP*), states that one storage or parking space is required per residential unit. The scheme would generate a requirement 13 cycle storage/parking spaces. In addition, it is proposed to create 248sq m of B1 floorspace, for which 2 spaces (one each for staff and visitors) are

required. In all the 20 secure cycle spaces proposed complies with policy.

- 7.7.4. The site is in a built-up inner urban area with some challenges for construction impacts including the transportation of building materials, plus required space for construction activities that are likely to impinge on pedestrians and neighbouring city car club bays. Therefore the submission and approval of Construction, Service and Refuse Management Plans are recommended in order to ensure that there is no obstruction or harm to the road network during construction, and to ensure highway safety in line with policy T12. These will be secured via a s106 agreement.

7.8. ENERGY, RESOURCES AND BIODIVERSITY

- 7.8.1. The applicant has re-submitted a previously undertaken EcoHomes pre-development assessment and that demonstrate an undertaking to produce a development that meets a standard of 'very good' which is welcomed. This is pertinent, as new residential development now requires the submission of a Code for Sustainable Homes (CSH) pre-development assessment that should achieving Level 3 and 50% of the credits available in Energy, Water and Materials should. However, such a pre-assessment is not appropriate for conversion proposals and the pre-assessments already undertaken are policy compliant. The proposals would also incorporate a brown roof, which will also enhance biodiversity as required by policy N5, and renewable energy components comprising solar heating to meet 20% of the site's energy needs. Implementation and management of the pre-development undertakings are to be the subject of a s106 agreement.

7.9. OTHER CONSIDERATIONS

7.9.1. Educational contributions

The number of residential units proposed exceeds the threshold in the CPG (5 units) whereby the Council can require a financial contribution to local educational provision. The financial contribution relates only to those units that result in child 'yield' (two bedroom units and above) and does not apply to the affordable housing as the occupancy nomination is managed by the Council and normally applies to person already utilising Camden educational services. The amount required for the 7 two-bedroom market units proposed is £18,888. This can be secured in the s106 agreement, but be a ground for refusal should the applicant be unwilling or unable to conclude this agreement within the 13-week period.

7.9.2. Noise attenuation

The site is in a noise-sensitive location. The submitted acoustic report states that the noise levels measured at the site was dominated by plant noise affecting the application site by approximately 4dB, indicating high ambient noise levels, where suitable mitigation could be undertaken where there is an identified housing need.

- 7.9.3. Policy SD7 suggests that the mitigation measures should incorporate reducing the impact of ambient noise levels by at least 3dB, and that details of the appropriate glazing be submitted to the LPA for approval prior to commencement of the works. A condition is recommended to

secure this. For the most part the noise mitigation measures contained in the acoustic report are considered satisfactory.

7.9.4. ***Sustainable communities and regeneration***

Community & regeneration - Reducing unemployment and addressing issues associated with being out of work, is a priority within Camden's Community strategy (target 52) and one of the cross-cutting themes of Camden's recent Local Area Agreement (LAA), and Social Inclusion Strategy (with particular reference to ensuring that redevelopment opportunities increase employment opportunities for all - policy **SD2**). The development would have the potential to make a meaningful contribution towards the objective of reducing unemployment. The applicant/developer has been invited to work in partnership with Kings Cross Working (KCW) to ensure that all job vacancies during the construction phases are registered with KCW at the same time as other recruitment efforts. The applicants and end-users will also be encouraged to use services of Camden Working, Camden's flagship employment initiative and undertake local procurement. These requirements will be incorporated in the s.106 agreement.

8. **CONCLUSION**

8.1. The proposed development offers significant benefits in terms of: maximising the potential of urban land in an accessible, central area location and delivering much-needed housing of an acceptable mix in a more appropriate location. There is no objection to the principle of transferring the existing residential obligation from Asta House to Suffolk House, in accordance with UDP objectives. Furthermore, there is no objection to the principle of business uses being located at Asta House, as its immediate surroundings are characterised by more office-based uses within the mixed-use central area, whereas there is established residential where the Suffolk House scheme is proposed. There would be no loss in residential floorspace established by the previous Asta House permission (2007/2280/P). Suitable contributions to highway measures would be made and the proposals would make welcome use of sustainability and biodiversity technologies and incorporate 'very good' EcoHomes status.

8.2. The resulting development would be of high quality and considered design with high quality materials and details that: respond well to scale, portions, form and surroundings; preserves and enhances the character of the conservation area; and minimises potential impacts on local residents with no significant loss of light.

8.3. On the basis of the aforementioned comments and assessment, it is considered that the proposal is an appropriate, contemporary response to the unique characteristics of Suffolk House. Approval is therefore recommended.

9. **LEGAL COMMENTS**

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

10. RECOMMENDATION 1:

GRANT PLANNING PERMISSION subject to conditions and legal agreement:

10.1. *LEGAL AGREEMENT*

- Payment of the Council's reasonable costs
- Contribution to s.106 monitoring of £500 per head of term
- Clause to secure the 2 social rented and 2 intermediate units as affordable housing in perpetuity
- Car capped development
- Capital contributions to the following: public highway works (approx £3,200)
- Educational contribution of £22,036
- Open Space contribution of £43,790
- Residential Green Travel Plan, to ensure that occupiers adopt sustainable transport practices
- Provision of Construction Management Plan (prior to implementation)
- Community working group for construction management
- Provision of Service and Refuse Management Plan (prior to implementation)
- That the development be implemented incorporating sustainability measures to meet a standard of 'very good' and that 20% of the site's electricity needs to be from renewable sources.
- The use (during the construction period) of all reasonable endeavours to ensure that a proportion of the workforce is comprised of Camden residents and work in partnership with Kings Cross Working re training opportunities.

10.2 *CONDITIONS:*

TIME LIMIT

1. The development hereby permitted must be begun not later than the end of three years from the date of this permission.

REASON: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

MATERIALS/SAMPLES

2. **(Condition to be met before the development is carried out)** Before commencement of the development, detailed drawings at an appropriate scale [including sections, all elevations and plans where appropriate] and/or samples of materials, as appropriate, shall be submitted to and approved in writing by the local planning authority;

and the approved details/materials shall thereafter be implemented and retained. Such details shall include: All external facing materials with respect to the following elements: windows, window openings [including surrounds and cills], glazing, balconies/terraces, balustrading, doors, facing materials (inc stonework), render, louvres, roof materials and green/brown roof elements. A sample materials board of these details shall be displayed and maintained on site throughout the construction period.

REASON: In order to safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies S1, S2 and B1 of the Camden Replacement Unitary Development Plan 2006.

EXISTING/PROPOSED LEVELS

(Condition to be met before the development is carried out)

3. Before commencement of the development, details of proposed slab levels of the development, in relation to the existing and proposed levels of the site and the surrounding land, shall be submitted to and approved in writing by the local planning authority and the approved details shall thereafter be implemented and maintained.

REASON: In order to ensure that the height of the development is no greater than indicated on the approved drawings, so as to protect the availability of light enjoyed by nearby residential premises, in accordance with the requirements of policy SD6 of the Camden Replacement Unitary Development Plan 2006.

LANDSCAPING/TREES

(Conditions to be met before the development is carried out)

4. Before commencement of the development, full details of hard and soft landscaping; tree and plant species; locations and full details of the design, materials and type of boundary treatment to be erected; means of enclosure of all un-built open areas (including lighting); and an Open Space Plan for the development that demonstrates and makes the most efficient use of the site as an open space resource for all occupants and users of the development shall be submitted to and approved in writing by the local planning authority; and the approved works shall thereafter be implemented and maintained.

REASON: To enable the Council to ensure a reasonable standard of visual amenity in the scheme in accordance with the requirements of policies B1 and N4 of the London Borough of Camden Replacement Unitary Development Plan 2006.

5. All hard and soft landscaping works shall be carried out to a reasonable standard in accordance with the approved landscape details by not later than the end of the planting season following completion of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be

replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

REASON: To ensure that the landscaping is carried out within a reasonable period and to maintain a satisfactory standard of visual amenity in the scheme in accordance with the requirements of policies B1 and B7 of the London Borough of Camden Replacement Unitary Development Plan 2006.

PLANT AND AMENITY

(Condition to be met before the development is carried out)

6. Before commencement of the development, details of plant to be installed [including sound attenuation and acoustic isolation from the structures] shall be submitted to and approved in writing by the local planning authority; and the approved details [including specified maximum noise levels] shall be thereafter implemented and maintained.

REASON: To ensure that the appearance of any external plant is compatible with the appearance of the building and the area and to ensure that residential amenities are protected, in accordance with the requirements of policy SD7 of the Camden Replacement Unitary Development Plan 2006.

(Other conditions applicable to the development/use)

7. No plant, ventilation, air conditioning, extraction or other such equipment shall be provided other than where specified on the plans without the prior written consent of the local planning authority.

REASON: To safeguard the visual amenity of the proposed and the area generally, in accordance with the requirements of policies S1, S2 and B1 of the Camden Replacement Unitary Development Plan 2006.

8. At 1 metre outside the windows of any neighbouring habitable room the level of noise from all plant and machinery shall be at all times at least 5 decibels below the existing background noise levels, expressed in dB(A) at such locations. Where the noise from the plant and machinery is tonal in character the differences in these levels shall be at least 10 dB(A).

REASON: To safeguard the amenities of occupiers of the proposed use, adjoining premises and the area generally in accordance with the requirements of policy SD6 of the Camden Replacement Unitary Development Plan 2006.

OTHER ENV HEALTH CONDITONS

(Conditions to be met before the development is carried out)

9. Before commencement of the development, a supplementary acoustic report to demonstrate satisfactory internal noise levels, shall be submitted to and approved in writing by the local planning authority and the approved details shall be thereafter implemented and maintained.

REASON: To safeguard the amenities of occupiers of the proposed use, adjoining premises and the area generally in accordance with the requirements of policy SD6 of the Camden Replacement Unitary Development Plan 2006.

10. No development shall take place until

a) The investigation has been carried out in accordance with the approved details and the results and remediation measures (if necessary) have been submitted to and approved by the local planning authority.

b) The applicant shall notify the local planning authority when remediation works commence. All approved remediation measures shall be implemented strictly in accordance with the approved details.

REASON: To protect future occupiers of the development from the possible presence of ground contamination in accordance with the requirements of policy SD10B of the Camden Replacement Unitary Development Plan 2006.

(Other conditions applicable to the development/use)

11. That appropriate measures, including methods of storage and waste removal (including recycled materials) shall be detailed in a waste management plan that shall be submitted to and approved by the local planning authority prior to the completion of the development and shall be thereafter be maintained.

REASON: To safeguard the amenities of occupiers of the proposed adjoining premises and the area generally, in accordance with the requirements of policies SD6 of the Camden Replacement Unitary Development Plan 2006

DRAINAGE

(Conditions to be met before the development is carried out)

12. Before commencement of the development, details of sustainable drainage measures to demonstrate the restriction of discharge to the greenfield rate [in line with Appendix E of PPG25] shall be submitted to and approved in writing by the local planning authority; and the approved details shall be thereafter implemented and maintained.

REASON: To attenuate water run-off, prevent pollution of the water environment, minimise risk of flooding and improve the water quality, in accordance with the requirements of policy SD9B of the Camden Replacement Unitary Development Plan 2006.

13. Before commencement of the development, details of the construction of a surface water drainage system to make proper provision for ground, water courses or a suitable sewer [and that for surface water storm flows attenuated or regulated into the receiving public network through on or off site storage] shall be submitted to and approved in writing by the local planning authority; and the approved details shall be thereafter implemented and maintained.

REASON: To attenuate water run-off, prevent pollution of the water environment and to ensure that surface water discharge from the site shall not be detrimental to the existing sewerage system, in accordance with policies SD1 and SD9B of the Camden Replacement Unitary Development Plan 2006.

ENERGY/SUSTAINABILITY/BIODIVERSITY

Water

(Conditions to be met before the development is carried out)

14. Before the development commences, a Water Strategy and plans describing and illustrating the efficient use of water, water capture, recycling and re-use and run-off limitation systems in the development, must be submitted to and approved by the local planning authority. The Strategy should aim for a discharge rate to the sewer of no more than 50l/s. To be approved by the local planning authority, the strategy and plans must show:
- a) How all the rain water and grey water from the site will soak away or be collected, including the the location and capacity of storage tanks, which shall be capable of retaining rain water resulting from at least a 1 in 50 rain event
 - b) Where and how the collected water is to be re-used within the development, including any necessary filtration and treatment measures for the following purposes, with preference in the order shown:
 - i. Flushing toilets
 - ii. Watering landscaping at ground and other floor levels throughout the development
 - iii. Watering green roofs
 - c) Any changes to this provision that are agreed by the local planning authority.

REASON: In order to secure the appropriate water efficiency and sustainable drainage measures, in accordance with the requirements of policy SD9B of the London Borough of Camden Replacement Unitary Development Plan 2006 and the London Plan 2008 (consolidated with alterations since 2004)

(Other conditions applicable to the development/use)

15. Prior to occupation of the development, the applicant must construct and implement the measures in the approved Water Strategy referred to in condition 21 and maintain them thereafter.

REASON: In order to secure the appropriate water efficiency and sustainable drainage measures, in accordance with the requirements of policy SD9B of the London Borough of Camden Replacement Unitary Development Plan 2006 and the London Plan 2008 (consolidated with alterations since 2004)

Biodiversity

(Conditions to be met before the development is carried out)

16. No part of the development hereby approved shall be occupied until a Biodiversity Action Plan setting out measures for biodiversity and wildlife habitat improvements including the provision of bird and bat boxes, has been submitted to and approved in writing by the local planning authority. The measures contained in the Biodiversity Action Plan shall at all times remain implemented.

REASON: In order to conserve and enhance biodiversity and wildlife habitats in accordance with the provisions of policy N5 of the London Borough of Camden Replacement Unitary Development Plan 2006

17. Before the commencement of the development, details of the proposed green/brown roofs, including: species; planting density; substrate; a section drawing at scale 1:20 demonstrating the adequate depth availability for a viable green/brown roof; and a maintenance plan, shall be submitted to and approved in writing by the local planning authority. The measures contained in the submitted details shall at all times remain implemented.

REASON: In order to conserve and enhance biodiversity and wildlife habitats in accordance with the provisions of policy N5 of the London Borough of Camden Replacement Unitary Development Plan 2006

Use of recycled and renewable building materials

(Conditions to be met before the development is carried out)

18. Before the commencement of the development, a Renewable Building Materials Plan, demonstrating that (up to 30% of) the development is constructed of recycled and renewable materials, and the method of re-use/storage of demolition materials, shall be submitted to and approved in writing by the local planning authority and the approved details shall be implemented in strict accordance with the Renewable Building Materials Plan.

REASON: In order to secure the appropriate energy and resource efficiency measures in accordance with the requirements of policy SD9D of the London Borough of Camden Replacement Unitary Development Plan 2006.

OTHER CONDITIONS

(Other conditions applicable to the development/use)

19. Prior to commencement on site, additional Lifetime Homes information shall be submitted to and approved by the local planning authority. This information must show that all the 16 relevant points have been met, or where this is not feasible, the provision of a full and detailed justification.

REASON: In order to define the permission and at all times In order to secure housing with a suitable level of access for all, in accordance with the requirements of policy H7 of the Camden Replacement Unitary Development Plan 2006.

10.3. **INFORMATIVE(S):**

1. Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which 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, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
2. 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. The penalty for contractors undertaking noisy works outside permitted hours is a maximum fine of £5000 per offence. You are advised to consult the Council's Environmental Health Division, Camden Town Hall, Argyle Street, WC1H (Tel. No. 020 7974 4444) 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.
3. Reasons for granting permission.

The proposed development is in general accordance with the policy requirements of the London Borough of Camden Replacement Unitary Development Plan 2006, namely: SD1A & B - Quality of life and regeneration; SD1C - Access for all; SD1D - Community safety; SD2 - Planning obligations; SD3 - Mixed-use Development; SD4 - Density of development; SD5 - Location of development with significant travel demand; SD6 - Amenity for occupiers and neighbours; SD7B - Light, Noise and vibration pollution; SD8 - Disturbance from plant and machinery; SD8B - Disturbance from demolition and construction; SD9A - Air quality; SD9B - Water quality; SD9C - Use of energy and resources; SD9D - The use of recycled and renewable building materials; SD12 - Development and construction waste; H1 - New housing; H2 - Affordable housing; H3 - Protecting existing housing; H7 - Lifetime homes and wheelchair housing; H8 - Mix of units; B1 - General design principles; B2 - Design and layout of development large enough to change their context; B7 - Conservation areas; N4 - Providing public open space; N5 - Biodiversity; T1B - Transport assessments; T2 - Capacity of transport provision; T3 - Pedestrians and cycling; T4 - Public transport (*proposal acceptable*); T7 - Off street parking, city car clubs and city bike schemes; T8 - Car free and car capped housing; T9B - Impact of off-street parking; T12 - Works affecting highways; E2 Retention of existing business uses; C1 - New community uses; C3 - New leisure uses; Appendix 1: Noise and vibration thresholds; and Appendix 6: Parking Standards. Furthermore, the proposed development offers significant benefits in terms of: maximising the potential of urban land in an accessible, town centre location and delivering a much-needed community centre and improved replacement housing of an acceptable mix, in accordance with Camden's UDP policies. The proposed height, scale and mass is acceptable. The applicant has entered into a section 106 agreement to ensure that various matters such as: highway works, sustainability and

energy efficiency provisions are secured.

11. RECOMMENDATION 2

11.1 In the event that the s.106 Legal Agreement referred to above has not been completed within 13 weeks of the date of the registration of the application, the Development Control Service Manger be given authority to refuse planning permission for the following reasons:-

Reasons for refusal:

1. The proposal, by reason of a failure to provide highway contributions to undertake external works outside the application site, would be contrary to policies T3 and T12 of the Camden Replacement Unitary Development Plan 2006.
2. The proposal, by reason of the failure to provide car-capped housing, would be contrary to policy T8 of the Camden Replacement Unitary Development Plan 2006.
3. The proposal, by reason of a failure to provide Construction, Service and Refuse Management Plans would be contrary to policy T12 of the Camden Replacement Unitary Development Plan 2006.
4. The proposal, by reason of a failure to provide an Energy Strategy to incorporate additional sustainability and energy efficiency requirements would be contrary to policy SD9 of the Camden Replacement Unitary Development Plan 2006.
5. The proposal, by reason of a failure to provide an educational contribution of £18,888 would be contrary to policies SD1 and SD2 of the Camden Replacement Unitary Development Plan 2006
6. The proposal, by reason of a failure to provide an open space contribution of £21,794, would be contrary to policies SD1 and SD2 of the Camden Replacement Unitary Development Plan 2006

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