

2394A/PGW

***DUNSTAN HOUSE  
14A ST CROSS STREET, LONDON EC1N 8UN  
FOR STEEPARCHES LIMITED***

***DESIGN AND ACCESS STATEMENT***

Revision C    30/06/16



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## ***INTRODUCTION***

### ***1.1 Purpose:***

This Report is submitted in support of the proposals by Steeparches Ltd for altering and extending the existing building at 14a St Cross Street. It is to be read in conjunction with the drawings and other documentation submitted to the London Borough of Camden with the planning application.

### ***1.2 Document Structure:***

We have prepared this report in accordance with published guidance on Design and Access Statements by Camden Council.

### ***1.3 Site Location:***

Dunstan House is on the North side of St Cross Street, see location plan 2394A/L1/01.

### ***1.4 Development Objectives:***

The proposals have been developed to provide additional office floor space to the roof of this building in order to help meet demand from tenants. The existing flat roof is undistinguished and makes no contribution to the Conservation Area. Based on an analysis of the site context the objective is that the new floor should be almost invisible from street level and will not have adverse sunlight/daylight implications for adjoining properties.

## ***THE DESIGN PROCESS***

### ***2.0 Existing Site Context***

#### ***2.1 The Existing Building***

Dunstan House comprises lower ground, ground and four upper floors. All floors are in business use (class B1a), accessed by a lift and single staircase.

The building is of post-war construction c1957 and is not listed. There do not appear to have been any significant alterations since then which have affected the external appearance. The main frontage and pedestrian entrance is on the corner of St Cross Street and Saffron Hill. Constructed with a concrete frame, the building is clad in red brick with a prominent concrete band course at roof level; above this a brick parapet and concrete coping conceal the flat roof (refer to site photographs appended).

On the street corner the brickwork rises a storey higher to enclose a tank room. The curved corner brickwork is cut back on the 1<sup>st</sup>-3<sup>rd</sup> floors to reveal full-height glazing to the lift lobbies, and a deeper recess at ground floor level emphasises the main entrance. The front door is protected by a projecting canopy and approached by a short flight of steps in terrazzo; the raised ground floor level enables the lower ground floor to be day lit with recessed windows along the Saffron Hill frontage.

The St Cross Street elevation is in plain brick with rectangular steel-framed casement windows in concrete linings. The Saffron Hill elevation is similar at 4<sup>th</sup> floor level but the lower floors are very different, expressing the framed concrete construction with glazing between the columns and rendered spandrel panels.

The property fills the entire site, with a small light well at the rear above first floor level.

## **2.2** *Nearby Buildings*

Photographs of the immediate surroundings are appended, showing that the adjoining building at 14 St Cross Street (Munro House), is almost two storeys higher than Dunstan House. Buildings along Kirby Street to the South, Hatton Garden to the West and Saffron Hill to the East are up to 5 storeys higher.

To the east the adjoining building (nos. 26-29 St Cross Street), is a multi-storey car park; on Saffron Hill it is also two storeys higher than Dunstan House. No. 44 Saffron Hill is Da Vinci House, a residential building, recently extended with an additional sixth floor almost opposite the entrance to Dunstan House. To the south the offices at Nos. 99-103 Saffron Hill rise to six storeys. The adjoining office building to the north (nos. 91-94 Saffron Hill) is four storeys high.

## **2.3** *Movement Routes*

St Cross Street provides an east-west route between Farringdon and Hatton Garden. Vehicular traffic is one way westbound. For pedestrians Saffron Hill provides a north-south route parallel to Hatton Garden. Refer to the Access Statement part of this report for further details.

## **3.0** *Social Context*

### **3.1** *Existing Occupiers*

All offices within the building are fully occupied. The scope of the proposed development has been limited to avoid any alteration to existing tenancies and to minimise disruption to them during construction.

### **3.2** *Adjacent Occupiers*

The area is predominantly in business use. There is some housing interspersed with the office uses, such as at 44 Saffron Hill (Da Vinci House) and 14 St Cross Street (Munro House).

In view of the importance of reducing the impact of the proposed additional floor space on neighbours (considering shadowing, lighting, visibility, proximity, privacy, overbearing and noise issues), a detailed daylight and sunlight analysis and a noise assessment study were commissioned at an early stage in the design process.

## **4.0** *Planning Policy Context*

### **4.1** *Planning History*

A search of the Camden Planning Register has been undertaken. The significant cases are:

14a St. Cross Street - PL/8900392 (14/02/1990) - *Established Use Certificate – Class B1*.

14a St Cross Street - PL/9000220 (26/06/1990) - *Installation of new Entrance Door* - Approved.

44 Saffron Hill - 2011/5571/P - *Erection of replacement fifth floor, new sixth floor and new part seventh floor to provide additional accommodation for two existing fifth floor self-contained residential flats to become maisonettes (Class C3) and create two new additional self-contained flats at fifth floor level (1x studio and 1x1 bed unit - Class C3) and associated works including external terrace areas with balustrades at sixth floor and seventh (roof) level, green roof and fenestration alterations following demolition of existing fifth floor.* Approved.

Munro House, 14 St Cross Street – P9602909 (1997) - *Change of use of part ground floor and upper floors from office to residential plus the erection of a roof extension to provide 4 x 1 bed, 4 x 2 bed and 2 x 3 bed flats, as shown on drawing numbers 9616/P01 to P12; 9615/02, /03, and /04.* Approved.

Alan House, 55-59 Saffron Hill – (1999) - *Change of use from office (Class B1) to residential (Class C3) involving the erection of a 3 storey roof extension and elevation changes to provide 20 flats on 1st to 8th floors and 5 affordable housing units at ground/basement, as shown on drawing numbers 715/PL/01-04, 05A, 06A, 07(1)A, 08A-11A, 13A, 15A, 17A, 18A, and 20A-26A.* Approved.

#### 4.2 *Listed Buildings*

Dunstan House is not included on the Statutory List. There are no adjacent listed buildings.

8A St Cross Street is the only scheduled historic building in the immediate area, and is situated some way away on the south side of the street at the junction with Hatton Garden.

#### 4.3 *Conservation Area*

The property is in the Hatton Garden Conservation Area (designation no. 34 by the London Borough of Camden). The Hatton Garden Conservation Area Statement (1999) contains general guidance relevant to this project. Development within the Conservation Area should preserve or enhance its special character or appearance, and should be of a high quality in terms of design, materials and execution.

No. 26-29 St Cross Street (the multi-storey car park) is included on the list of buildings having a negative impact on the character of the Conservation Area. Others, including no. 18 St Cross Street are included on a schedule of unlisted buildings which make a positive contribution to the character of the area.

#### 4.4 *National and Regional Planning Policy Considerations*

The National Planning Policy Framework (2012) sets out Government planning policy and includes the principle that planning should seek to secure high quality design and a good standard of amenity for all occupants of land and buildings.

The Mayor of London Order sets out which planning applications must be referred to the Mayor. It is considered that the current proposals for Dunstan House do not form an “application of potential strategic importance”.

The Mayor of London is responsible for producing a spatial development strategy for London and The London Plan (2015) includes planning policy on strategic views. The London View Management Framework (2012) Supplementary Planning Guidance explains how 27 views designated by the Mayor and listed in the London Plan are to be managed.

The site is affected by the following strategic views:

- 2A.1 View From Parliament Hill to St Pauls (Strategic Viewing Corridor)
- 3A.1 View From Kenwood to St Pauls (Strategic Viewing Corridor)

#### 4.5 *Local Planning Policy Considerations*

The Local Development Framework Core Strategy sets out overall policies for use when determining applications in Camden. Policy CS1 (*distribution of growth*), CS5 (*Managing the impact of growth and development*) and CS14 (*Promoting high quality places and conserving our heritage*), are relevant to this proposal. The following sections of Camden Development Policies 2010-2025 also have relevance:

- DP13 – Employment sites and premises
- DP19 – Managing the impact of parking
- DP22 – Promoting sustainable design and construction
- DP24 – Securing high quality design
- DP25 - Conserving Camden’s heritage
- DP26 – Managing the impact of development on occupiers and neighbours
- DP 28 – Noise and vibration

Supplementary planning guidance has been published by Camden in support of these policies; CPG1 (*Design*) sets out the Council’s policies for design, including the design of alterations and extensions, and CPG6 covers amenity.

Planning policies also provide that development will not generally be acceptable if it obstructs important local views or skylines. No relevant important local views are identified within the conservation area statement.

### 5.0 *Design Development*

#### 5.01 *Constraints and Opportunities*

There are opportunities:

- To increase the office floor space within the building
- To extend at roof level within the context of taller neighbouring buildings
- To improve the existing flat roofscape which is considered unsympathetic to the Conservation Area

In order to achieve this the design needs to take account of various constraints:

- Planning policy constraints, although recent development has increased the height of nearby buildings
- Amenities of nearby occupiers, both residential and commercial

#### 5.02 *Design Concept*

The intention of the design is to add two storeys to the flat roof in such a way that the bulk of the new floor will not be readily visible from street level. This is to be achieved by setting the additional floor space back from the perimeter of the building. This will also reduce any adverse sunlight/daylight implications for adjoining properties.

There is no established roof style in the immediate area so the design needs to be sympathetic to the age and character of Dunstan House itself. In elevation the new floors will form a roof storey to the building instead of attempting to carry the existing elevations higher. In section the sixth floor will form a small pavilion, set back even further to reduce the impact of the additional storey at street level.

By incorporating areas of accessible roof terrace and green roofing the design will improve the quality of the roofscape in the local area.

#### 5.03 Consultation

Details of the proposals have been forwarded to Camden for Pre-Application Advice. Their response (letter 28/09/2015 ref. 2015/4303/PRE) suggested that:

*The proposed roof extension would be acceptable in terms of its design and impact on the character of the location and conservation area. The massing of the extension in close proximity to the residential units on adjacent building no. 14 Cross Street would harm the amenity of those residential units and would not be acceptable to Development Policy plan DP26. The principle of the roof extension would be acceptable but a revised design and bulk that would not harm the surrounding amenity would be required for a favourable determination.*

#### 5.04 Changes to the Design

The proposals have been substantially revised to address the issues raised during consultation. The main changes have been as follows:

- At fifth floor level the proposed new floor has been pulled back from the western boundary at the rear to reduce the impact on no. 14 St Cross Street.
- At sixth floor level the proposed additional floor has been re-planned so that the accommodation is pulled forward towards St Cross Street. This also reduces the impact at the rear on no. 14 St Cross Street.

#### 5.05 Effect on Amenity

In view of the importance of reducing the impact of the proposed additional floor space on neighbours, especially the residential occupiers at no. 14 St Cross Street, a further daylight and sunlight analysis has been commissioned from Anstey Horne. Their report is appended and demonstrates how the guidelines in the BRE Report 209 *Site Layout Planning for Daylight & Sunlight: A Guide to Good Practice* have been met. The report shows that sunlight is not an issue and daylight analysis shows that the revised design will cause negligible effect on the adjacent dwellings.

## ***DESIGN PROPOSALS***

### **6.0      *Use***

6.01      No change is proposed to the existing business use which is considered to be appropriate for the area as described above.

### **7.0      *Amount***

7.01      The following table summarises the gross internal floor areas (sq m):

<b><i>As Existing</i></b>	<b><i>Total</i></b>
Lower Ground Floor	294.0
Ground Floor	276.2
First Floor	242.3
Second Floor	242.0
Third Floor	244.3
Fourth Floor	246.0
Fifth Floor (plant)	25.3
<b>TOTAL</b>	<b>1,570.1</b>
<b><i>As Proposed</i></b>	<b><i>Total</i></b>
Lower Ground Floor	294.0
Ground Floor	276.2
First Floor	242.3
Second Floor	242.0
Third Floor	244.3
Fourth Floor	246.0
Fifth Floor	200.9
Sixth Floor	88.8
<b>TOTAL</b>	<b>1,834.5</b>
Additional area	264.4
Plot area on ground floor	305.4

7.02      The amount of this development is therefore an increase of 264.4 sq m (2,845 sq ft). Camden policy DP13 (paragraph 13.8) sets a threshold of 200sq m of additional space, above which the Council will seek to negotiate up to 50% of the additional floor space as affordable premises suitable for the jewellery sector and housing. In this case the on-site provision of affordable housing is considered impractical; a separate access would be required for this secondary use and this is not possible within the constraints of the site. Provision of affordable jewellery workshop space (class B1c) has also been considered and we understand that it may be appropriate for a financial contribution to be agreed with the Council towards support for the jewellery industry in Hatton Garden.

7.03      Taking account of the restrictions on the site and the aims of good urban design, we consider this amount of additional floor space is suitable for the site. This amount of development will not adversely change the neighbourhood, for example by placing significant extra demand on local services, and is appropriate for the context.



## **8.0**      ***Layout***

8.01      The new fifth floor is set back slightly behind the existing building line along Saffron Hill, and more substantially set back along St Cross Street in response to the set-back on no. 14 adjacent. There will be a paved roof terrace at the rear.

8.02      At sixth floor level the new accommodation runs along the St Cross Street elevation and is set back further than the fifth floor, well behind no. 14 adjacent. Accommodation for air conditioning plant is included at this level and a noise assessment study has been carried out by Clarke Saunders Acoustics (copy appended). On site measurements have been carried out to determine the current background noise climate and establish a 24-hour design criterion for the control of plant noise emissions to noise sensitive properties nearby. Data for the new plant has been used to predict the noise impact on neighbouring residential properties and to demonstrate compliance with the noise emission design criterion. This confirms that the proposed plant will cause no harm to the amenity of nearby residential units in accordance with the requirements of Camden policy DP28.

8.03      The section drawing 1118A shows how the additional fifth floor has been set back at the rear to reduce the impact to amenity on the flats at the rear of no. 14 St Cross Street. To ensure there will be no adverse sunlight/daylight implications for adjoining properties the current proposals have been assessed by Anstey Horne. Their sunlight and daylight analysis is appended and demonstrates that Camden's planning policy on daylight and sunlight will be satisfied.

## **9.0**      ***Scale***

### **9.01**      ***Height***

Neighbouring buildings have established a context allowing scope for roof extensions at Dunstan House. The developments at 14a St Cross Street, 44 and 55-59 Saffron Hill have increased the heights in the local area. The proposed design is lower than these buildings.

### **9.02**      ***Character***

The planned scale has been influenced by the existing character of the area. There is no distinctive local roof style in this part of the conservation area. Camden planning guidance in CPG1 (section 5.8) recommends that roof extensions should be *architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form*. The proposed design will be subordinate to the original building; instead of replicating the masonry of the lower floors the design is conceived as a roof storey. It will add visual interest to a group of buildings of differing heights and add to the variety of form.

### **9.03**      ***Strategic Views***

Whilst no relevant important local views are identified within the Council's conservation area statement, the proposals will have minimal effect locally; very little of the additional accommodation will be immediately visible from street level, as demonstrated by the drawings and 3D views. The scale of the proposed roof extension will not infringe any local views.

In order to assess the impact of the proposals on strategic views we have carried out a study which shows that Dunstan House falls outside the Landmark Viewing Corridors designated in *The London View Management Framework* except 2A.1 (View From Parliament Hill to St Paul's Cathedral) and 3A.1 (View From Kenwood to St Paul's). This study (refer to drawings 1116A and 1117A appended), showed that the top floor of Dunstan House is well below the threshold plane for each of these corridors and the proposed development will not infringe these strategic views.

## **10.0 Appearance**

### **10.01 Bulk**

We have shown that the bulk of the new floor space will not be readily visible from street level. The proposed sequential set-backs at each of the new floor levels follow a similar pattern to that seen on adjacent buildings on Saffron Hill and the corner of Kirby Street, and soften the impact of the additional floor space.

### **10.02 Quality**

The existing 5<sup>th</sup> floor brick tank room on the street corner will be removed and the existing parapet extended around to unite the St Cross Street and Saffron Hill elevations. The new fifth floor will be set behind this, and is curved on plan, reflecting the existing curved corner feature. A glazed curtain wall will receive passive solar protection from an aluminium brise soleil louvre system; the louvres and other cladding details will be powder coated in a silver grey finish to provide a more appropriate top to the elevation than the existing flat roof.

Above this the new sixth floor roof terrace will edged with a frameless glass balustrade which will further screen the top floor from street level without increasing the sense of enclosure. The office space opens on to this terrace through sliding clear glass doors set within walls finished in grey zinc sheet cladding. The roof will be finished with a sedum blanket as an 'extensive' green roof to limit water run-off.

We consider these proposals will enhance the architectural quality of the existing building. In terms of architecture, materials and colour the proposed appearance will relate better to its setting than the existing flat felt roofing. In summary:

- the form, proportions and character of the building and its setting have been respected;
- the extension is subordinate to the original building in terms of scale and situation;
- original features are retained;
- high quality materials are used which match or complement existing materials;
- the unsympathetic tank room has been removed;
- the architectural integrity of the existing building is preserved;
- building services equipment is appropriately located.

We submit that the proposals therefore comply with Camden Core Strategy Policy CS14 which promotes high quality places and heritage conservation, and policy DP24 which requires high quality design.

### **10.03 Sustainability**

The proposals also demonstrate the incorporation of sustainable development principles, including the solar shading and green roof, to satisfy the requirements of policy DP22 of the Camden development plan.

# **ACCESS**

## **11.0 Inclusive Access**

### **11.01 Inclusive Design**

The design aims to provide an inclusive environment, by providing an integrated accessible solution for everyone instead of separate facilities for disabled people.

The design of new accommodation is to comply with current standards, within the constraints of the site. The design of alterations to the existing accommodation is to comply with current standards, where reasonably practicable within the constraints of the existing fabric.

### **11.02 Sources of Guidance**

- *The Equality Act 2010*
- *Building Regulations Approved Document M (2015)*.
- *The Town and Country Planning Act 1990*
- *BS 8300 (2001)*
- *Designing for Accessibility (Centre for Accessible Environments 2012)*.
- *Camden Development Policy DP29*

### **11.03 Key Issues of this Development**

The main issue to be considered for the provision of facilities for people with disabilities at Dunstan House is that the existing ground floor entrance involves negotiating steps; improving this is beyond the scope of the current proposals. From the ground floor entrance all floors are accessible by lift and stairs.

## **12.0 Movement to and through the Site and Buildings**

### **12.01 Approaching the Site**

*Public Transport:* Dunstan House is close to bus routes in Farringdon Road. Underground and main-line rail connections are within walking distance at Farringdon station; future Crossrail services will increase the range of connections available. Dunstan House is located in an area where the public transport accessibility level is 6a, the highest available. Camden planning guidance in CPG7 considers that places with a PTAL 4 and above are highly accessible.

*Vehicular Access:* St Cross Street provides an east-west route between Farringdon and Hatton Garden. Vehicular traffic is one way westbound. On-street car parking is limited and there is no existing off-street parking on site. The closest car park is the Saffron Hill car park immediately adjacent. The nearest designated disabled parking spaces are to be found in Hatton Garden or Saffron Hill. The current application proposes that no parking provision is required on site due to the high availability of public transport.

*Cycling:* The proposal includes for provision of five cycle parking spaces within the building at lower ground floor level.

*St Cross Street:* The main frontage to Dunstan House is on St. Cross Street, which is a secondary route for pedestrians and vehicles. The pavements are generally accessible by wheelchair.

*Setting down:* This is possible adjacent to the front doors of Dunstan House, but is liable to obstruct other traffic. The dropped kerbs facilitate wheelchair access.

*Signage:* It is important for visitors to be able to identify the building as they approach along St. Cross Street. The building is clearly identified by name on the projecting entrance canopy.

*Servicing:* There is no separate service access, the front door is the only entrance to the building.

#### *12.02 Entering the Buildings*

Pedestrian access to Dunstan House will continue to be from the street via the existing main entrance door. The entrance from St. Cross Street involves negotiating a stepped approach up from pavement level; the steps are provided with handrails in accordance with Building Regulations requirements. Security is maintained by an electrically locked door. Entry into the building has to be authorised by one of the tenants, there is no reception desk. Within the building there is lift access to all floors.

#### *12.03 Internal Planning*

All visitors enter the ground floor lobby area. From here there is direct access to all floor levels by means of the existing stair and lift. The new fifth floor offices will be approached by extending the stair and lift shaft. The sixth floor offices are intended to be ensuite with the fifth floor and will also be accessible from the existing stair; because of this it is not considered necessary to extend the lift up to the sixth floor. Extending the lift to the sixth floor would require a tall structure which would be visually intrusive and have an adverse impact on the amenity of neighbouring buildings.

#### *12.04 Facilities within the Building*

WC accommodation will be provided in accordance with statutory requirements. Cycling is encouraged by the provision of storage at lower ground floor level; showers are incorporated within the WC accommodation on each floor.

#### *12.05 Way-finding and Signage*

The proposals will continue the straightforward layout of this building. All visitors will continue to enter the building via the Lobby Area. It is proposed that colour and clear numbering will be used to provide identification of each floor. The existing signage system will be extended with directory boards and information signs at each floor level. Tactile signs will be used for lift controls where they can be easily reached. Design will follow the guidance set out in BS 8300.

#### *12.06 Evacuation*

The existing automatic fire detection and alarm system will be extended to cover all areas of the building. An updated evacuation strategy will be adopted by the building managers, based on advice from the design team, building users and fire officers. This will incorporate an escape strategy for disabled building users based on the recommendations of BS 5588 Part 8.

## ***SUMMARY AND CONCLUSIONS***

### ***13.0 Development Objectives***

In the first section of this Report we outlined the applicant's reasons for carrying out alterations to Dunstan House to provide an additional office accommodation in order to satisfy current demand from tenants.

### ***14.0 Assessment***

In the second section of this Report we described the existing building and context, and identified key Planning Policies which need to be addressed in considering any development proposals. The existing flat roof and tank room is undistinguished and capable of positive improvement. An important consideration is that the new floor space, although hardly visible from street level, should enhance the existing building and must not have adverse sunlight/daylight implications for adjoining properties.

### ***15.0 Design and Access Proposals***

We have described and illustrated proposals for alterations to Dunstan House at 14a St Cross Street to meet the objectives of Steeparches Ltd. We have described the process that led to these proposals, modified them to take account of pre-application planning advice, and demonstrated that the current proposals comply with key Planning Policies. In the access section of this statement we have demonstrated the evolution of a design based on the principles of inclusive access.

We therefore propose that the application for Planning Permission should be recommended for approval.