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28 February 2018

Our ref: MB/ElizabethHouse/mb/valrep Planning Ref: 2017/6946/P

Dear Tom

# PROPERTY: ELIZABETH HOUSE, 4-7 FULWOOD PLACE, LONDON, WCIV 6HG APPLICATION REFERENCE: 2017/6946/P

## **Background & Context**

Further to the above planning application lodged with London Borough of Camden, further supporting information is required for the accompanying Planning Statement in connection with Mixed Use Policy DPI.

Policy DPI requires a mix of uses in development where appropriate in all parts of the Borough, including a contribution towards the supply of housing. In the Central London Area of the Borough, where more than 200 m<sup>2</sup> (gross) of additional floorspace is provided, the Council requires up to 50% of all additional floorspace to be delivered as housing.

Where the secondary, residential, use is appropriate for the area but cannot practically be achieved on site, the Council may accept off site solutions where developments involve a relatively small addition to floorspace (as with the subject application) on the basis that additional residential floorspace matches the net addition to non-residential floorspace, taking into account any non-residential floorspace removed in conjunction with the off site contribution (but also seeking replacement of any existing housing lost as part of each development).

This document is prepared for appending to the Planning Statement. It provides a review of alternative building options available in the marketplace for the possible provision of residential accommodation off-site.

A key consideration in the delivery of residential floorspace is to identify property options that present availability of long term tenure to enable delivery in perpetuity (either freehold or long leasehold) – and this forms an element of the assessment of opportunities set out in this report.



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#### Assessment of On-Site Provision

The Planning Statement prepared already sets out an assessment of whether it is feasible or practical to provide on-site residential provision within Elizabeth House but we briefly summarise some of the key constraints the site presents in this regard:

- Elizabeth House is the only property asset owned by the Applicant in Camden Borough.
- It is a relatively small building with a single office entrance and lack of scope to configure a second entrance from the front elevation for residential accommodation without major alteration. The addition of a further entrance on the front elevation would be resisted on design grounds within the conservation area.
- The building only has a single stair and lift core and therefore it is not feasible to allow for separate residential access through the building.
- The depth of the existing floorplan and the enclosed nature of the building to the rear and sides means that the only area suitable for residential accommodation is on the upper floors. An additional stair / lift core to the 5<sup>th</sup> floor would take up 100 m<sup>2</sup> of lettable office floor space on the floors below making this option commercially unviable.
- There is no scope to accommodate rear or side access to the building as it is bounded on three sides by buildings not within the ownership of the Applicant. There are no rights of way across/through neighbouring ownerships.

## Assessment of Off-Site Provision

The Planning Application will provide for an additional 432.5  $m^2$  (gross) of office space, without the provision of any secondary uses.

In our review of the alternatives available in the marketplace we have undertaken a search for development sites and non-residential buildings delivering between 220-350 m<sup>2</sup> in the Holborn & Covent Garden Ward of the Borough. This therefore represents opportunities that could deliver between appx 50%-75% re-provision (allowing for flexibility) of residential accommodation off-site based upon the increase in the gross floor area of non-residential accommodation proposed under the Planning Application.

We attach a schedule listing the search results from the buildings identified Ref: Appendix 1.

This has been sourced from the CoStar database (search conducted 26 February 2018). We have made all relevant enquiries of the agents appointed on each of those instructions to assess their availability for purchase and/or conversion to residential accommodation. The schedule sets out a brief commentary on each of the instructions identified based upon those enquiries.

In summary:

- No development sites able to accommodate residential development without resultant loss in nonresidential floorspace have been identified.
- No vacant freehold or long leasehold non-residential buildings able to accommodate conversion to residential have been identified which meet the above location and size search criteria.
- All the leasehold options identified that meet the location and size search criteria are reported not to be available for possible purchase and/or they form part of larger buildings in commercial use where the creation of long leasehold disposal of part is not practical.

• Many of the options identified have floors/units which do not ideally suit possible residential conversion either by virtue of configuration or window patterns needed to accommodate required sub-division and the creation of individual habitable rooms.

#### Conclusion

Our assessment of the availability of development plots or suitably sized and located commercial buildings in the Borough has not identified any options for redevelopment, or for freehold / long leasehold purchase capable of residential conversion (of whole or part). All leasehold options identified are unsuitable for residential conversion.

The Applicant does not own or control any other buildings in Camden Borough where an alternative off-site residential floorspace allocation could be delivered.

If any further clarification or enlargement is required on the above summary and appended schedule then please let me know.

Yours faithfully,

For STRETTONS

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