

# **ROUTE ONE PLANNING**

24 – 32 STEPHENSON WAY, LONDON, NW1 2HD

July 2019

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## Policy H2 Maximising the supply of self-contained housing from mixed use schemes

This policy specifically seeks provision of self-contained houses and flats (Use Class C3), rather than other forms of housing, in line with the priority land-use of the Plan as set out in Policy H1 Maximising housing supply.

The provisions of policy H2 were discussed with Officers (Thomas Sild) during pre-application discussions. Set out below are the matters raised and agreed.

An Approved Building Inspector who had advised the design up to Part B of the Building Regulations in order to check the requirements and the potential of the existing building to support residential use in conjunction with the pre-existing office uses.

In addition, a Fire Safety report from Astute Fire (Fire Engineering Consultants) was commissioned to advise on the implications of residential use being added to the building given the limitations and physical constraints of the existing building.

BS9991 sets out the requirement that staircases servicing residential accommodation should not interconnect with the commercial areas. In effect this means that escape stairs serving the residential accommodation must be wholly independent of the escape stairs serving the office accommodation. Each of the three existing staircases acts as a required escape stair to existing office accommodation within the current fire escape strategy for the premises leaving no 'spare' stair that could be re-designated for residential use without impacting on compliance to the offices space. This means that should residential accommodation be provided at least one new, dedicated staircase would need to be added to the building - see notes below.

There is no space around the periphery of the existing building that extends to ground that would allow an externally constructed stair to be added. Therefore, a new stair(s) would need to be cut through the existing occupied office floor plates. Due to existing long lease tenancies it would be impractical to take floorspace from the existing office floor plates.

Since there is no means to travel at ground level from the rear of the building to the street (place of safety) any new staircase(s) would need to be located onto the front portion of the building, fronting Stephenson Way. Two of the current three stairs servicing office accommodation are located on the front portion of the building so any new staircase(s) would cut across the existing windows on the front elevation. Aside from the practical issue of the need to take floorspace away from long leaseholders (principally across ground and first floor levels – both 10 year leases with no break clauses) on the existing office floors such a solution would unacceptably alter the character of the front elevation to Stephenson Way by adding staircase(s) behind existing windows.

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It is unlikely that a single means of escape would be acceptable to the residential accommodation and we believe any fire engineering arguments to avoid dual means of escape would be met with resistance by the fire authority and should not be advocated as an approach. This means that all of the issues highlighted would be doubly problematic and would lead to a situation where 50% of the front elevation to the building were occupied with escape stairs (two existing and two new ones).

Furthermore the owners of the building have previously designed and introduced twin sets of disabled lifts at ground floor level to improve the DDA compliance to the ground floor in order to cater for the change of heights from the internal office floor level to street level as a result of the building previously being a warehouse . Any new staircase introduction would impact on this and remove what is fully DDA compliant accommodation.

For the reasons outlined we contend that the existing building is not suitable for residential use.