

# **ROUTE ONE PLANNING**

24 – 32 STEPHENSON WAY, LONDON, NW1 2HD

**Policy H2 response – Revision 6**

**In support of Planning Application Ref: 2019\2733\P**

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25 October 2019

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

It has previously been demonstrated that the application building is not suitable for the provision of an element of self-contained residential use. This has been discussed and agreed with relevant officers.

Policy H2 states:

*Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.*

This document considers alternative off-site locations for the provision of housing.

The Council do not have a defined methodology in assessing the requirements of this policy. Therefore, it is an arbitrary process.

Agreement was reached with the Planning Officer on the search methodology and size of properties between 180sqm to 400sqm were considered as part of this exercise (Reference *Appendix A* - Email Correspondence from Ben Farrant dated 5 September 2019).

A catchment area was agreed to a radius of 1,200 metres from the application property as indicated in accompanying area plan (*Appendix B*). HNG Chartered Surveyors were instructed to undertake a search of available commercial floorspace within this catchment criteria. The total number of properties captured in the search was 124 although almost half of these identified properties lie outside of the London Borough of Camden. The total search summaries are contained under *Appendix C* and *Appendix C2* which also include properties in the City of Westminster. The search software can only capture a maximum of 99 No. properties thus explaining the inclusion for 2 No. search appendices.

Further discussions with the case officer were undertaken to establish those sites that should form part of this assessment, the foremost parameter being the property should be in the London Borough of Camden.

There is an extensive range of commercial floorspace available for rent and sale. However, the majority are far in excess of the 180sqm – 400sqm search criteria and in most cases sub-division for residential use will not be possible, particularly when only parts of floors are available. Private landlords are unlikely to let out small areas of their buildings for residential use, seeking to install tenants for larger areas and secure income. This parameter excluded many properties, including *Appendix C* sites, 25,30,31,32,33 and 34 and *Appendix C2* sites 1 and 6.

To provide floorspace for self-contained residential purposes would require the land/building to be under freehold ownership or on a long lease of 80 years or more. A significant proportion of the properties captured in the search are on far shorter lease terms including reference properties 31, 32, 81 and 86 under *Appendix C*.

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Buildings would require separate entrances in most instances. Shared entrances are unusual and would no doubt impact on the ability to secure letting. They would affect covenant strength and would be unattractive to landlords. Furthermore, shared entrances would raise security concerns. Shared entrances are only likely to be acceptable for properties of under 20,000 sq ft which are let out on a floor by floor basis. Example properties over 20,000 sq ft are contained under Appendix C – reference 30,31, 32 and 34. In most instances these are part floor accommodation making sub-division restrictive and provision of separate entrances and staircases through existing long lease space prohibitive (Appendix C – reference 87). As agreed at pre-application stage the application building would be unacceptable for the same reason.

To provide an element of residential within an existing office building would require a change of use application. The office space within the catchment area is in a central London location and generally of high quality. It is expected that the Council would seek to protect the loss of new purpose-built office and co-working space to residential – such examples would include site preference 30 and 31 under Appendix C.

There are properties identified within designated retail shopping frontages, such as Tottenham Court Road, and would be unsuitable for residential purposes, examples include Appendix C sites 10, 20 and 93.

Taking the above into account a comprehensive search of alternative, off-site locations for residential development has been undertaken. No sites were identified that would be suitable or viable to provide the amount of floorspace required under policy H2 and therefore we would be seeking to agree to making a payment in lieu.