



Design and Access Statement

**1-32 Brookes Court
London
EC1N 7RR**

Prepared on behalf of
**London Borough of Camden
5 Pancras Road
London
N1C 4AG**

**Job No: 33787
Date: July 2022**

Design And Access Statement

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London Borough of Camden
5 Pancras Road
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Prepared By: Matthew Allcock MRICS

Authorised for Issue:

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A	June 2022	To accompany Planning Application
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1.0 Introduction

1.1 General

- 1.1.1 This Design, Access and Heritage Statement has been prepared by Baily Garner on behalf of London Borough of Camden. It accompanies the full planning application for deep retrofit works to 1-32 Brookes Court.
- 1.1.2 This report responds to the requirements of the Town and Country Planning (Development Management Procedure) (Amendment) (England) Order 2013 for planning applications (with some exceptions) to be accompanied by a Design and Access Statement.
- 1.1.3 The structure and content of the statement has been informed by DCLG Circular 01/2006 Guidance on Changes to the Development Control System (12 June 2006), National Planning Policy Framework (20 July 2021) and Design and Access Statements: How to Write, Read and Use Them (CABE, 2007). Together these have provided advice on what a Design and Access Statement should include.
- 1.1.4 This Application references the following London Borough of Camden Planning Policy Documents:
- National Planning Policy Framework (NPPF) (March 2012)
- LB Camden DRAFT Capital Works RETROFIT PPA plan
- RETROFIT - Housing pro-forma
- Camden Local Plan
- Camden Policies Map 2021 August V3
- Retrofitting Planning Guidance (for sustainability measures in historic buildings)
- Energy efficiency planning guidance for conservation areas
- Historic England website
- Pre App Advice - RETROFIT CAMDEN - Brookes Court

1.2 Structure of the Statement

- 1.2.1 Based on the Circular 01/2006 and CABE advice, the following sections of the Statement comprise:
- Section 2.0 - Understanding the Context
 - Section 3.0 – Design - Description of Proposal, Use, Layout, Scale and Appearance
 - Section 4.0 - Access
 - Section 5.0 - Summary and Conclusion

2.0 Understanding the Context

2.1 Site Description

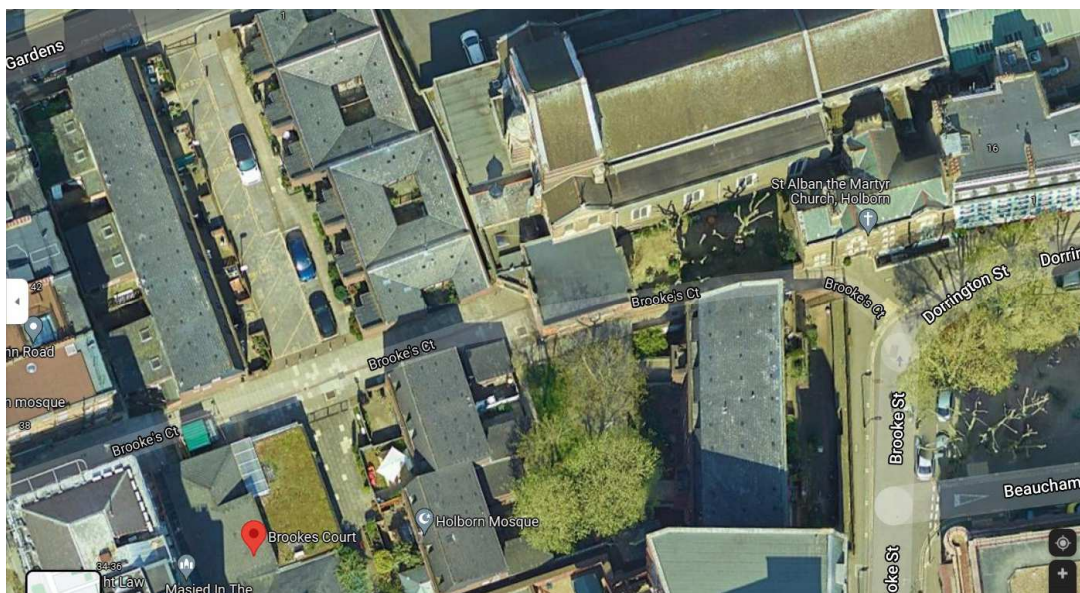
- 2.1.1 The site address is 1-32 Brookes Court, London EC1N 7RR. The estate is a mixture of 2 rows of townhouses (row of 6 (no. 1-6) row of 4 (29-32), a row of bungalows (no. 7-12) and a block of flats. The bungalows share a boundary with the Grade II* listed St Alban the Martyr Church. The block of flats is in close proximity to the Grade II* listed church and Grade II listed clergy house and attached railings with lamp holder. The townhouses no. 1-6 share a boundary with

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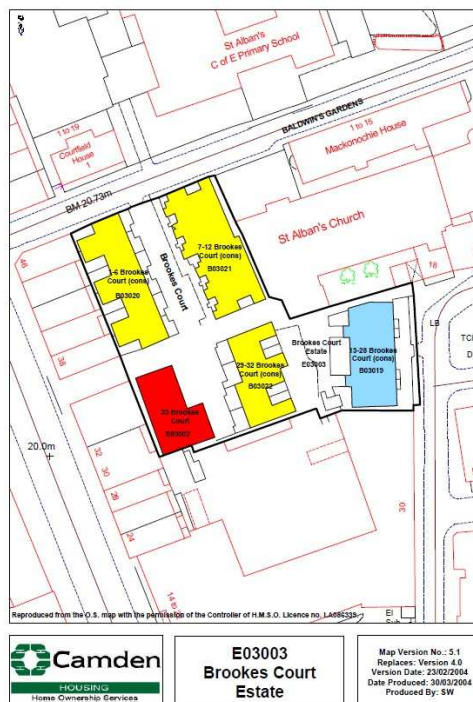
local listed 38-54 Gray's Inn Road. The estate lies next to Hatton Garden Conservation Area on the east. Close to Bloomsbury Conservation Area on the West. All properties are occupied, some are tenanted, several leasehold or freehold.

- 2.1.2 The area is in central London and has a mix of residential and commercial premises. Brookes Court resides in close proximity to local amenities, commercial premises of Hatton Garden and Leather Lane, and public transport, including local buses and Farringdon and Chancery Lane London Underground station.
- 2.1.3 There is no off-street parking on the site. There is restricted parking on the estate access roads for permit holders only. Brookes Court is accessed via Baldwin's Gardens off of Gray's Inn Road.
- 2.1.4 The current construction of the blocks will fall far short of the requirements of the current building regulations in terms of thermal performance. Currently the construction is such that the buildings offer poor thermal performance and therefore it is expected the residents within are suffering from elevated levels of heat loss, high fuel bills and issues associated with fuel poverty.



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2.2 External

- 2.2.1 The properties are a mix of three storey townhouses, five storey block of flats, and bungalows. Roofs are generally pitched slate covered with lean-to and close-boarded sections with parapet walls to the bungalows and parapet walls and gutters to the block of flats. The properties use an engineering type brick hue typical of era of construction 1980s. Loft voids and cavity walls are generally insulated.
- 2.2.2 The properties are generally of cavity brick construction varying from 250-280mm. The block of flats is believed to have a concrete frame with cavity brick infill. Bungalows and flats have solid concrete floors, with the townhouses having timber mid floors. All demises have timber roof construction, original single glazed aluminium sliding sash windows and timber part glazed, flush or Georgian wire glazed doors. Some of the flats have composite or flush entrance doors. The main communal door to the block of flats is metal composite with Perspex vision panel.
- 2.2.3 Flank access to several of the elevations is severely restricted (south side of townhouses 29-32, south side of block of flats, rear east side of bungalows, rear west side of townhouses 1-6).
- 2.2.4 There is a communal gas boiler serving the estate though some flat units have independent condensing combination boilers. Most units where the latter is not the case have hot water cylinders (typical jacketed) with copper pipework and cold water tank in locations.
- 2.2.5 There are variously TV cables and other fixtures to the façades requiring moving with other mounted service units including inset electric intake to front elevation of townhouses and bungalows.
- 2.2.6 Ventilation is a mix of manual operated glazing wheels and decentralised mechanical extract fans to wet rooms.

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- 2.2.7 Air bricks are observed on front and rear elevations in matching colour with the neighbouring surfaces. On the south flank elevation, air bricks are found at low level only.
- 2.2.8 Guttering and downpipes are UPVc prefinished in grey observed on both front and rear elevations with painted timber fascia board. Rainwater hoppers are observed at the cheeks of flat entrance cores and to external walls elsewhere variously. Downpipes generally discharge water direct to ground.
- 2.2.9 Lightning conductors are not identified.



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2.3 Internal

- 2.3.1 The estate comprises a mix of three storey townhouses, bungalows and flats either single storey or duplex. The units form four separate blocks of dwellings. The dwellings are a mix of tenanted, leaseholder, and freeholder demise.
- 2.3.2 The townhouses and bungalows are individual units with discreet front and rear private entrances. The block of flats has two separate stair cores which provide access at the estate side elevation to 8Nr flats each including the split level top storey duplex units.
- 2.3.3 There is no lift to the block of flats and we could not confirm operation of any fire and smoke detection/ diffusion system.
- 2.3.4 The lobby area and GF stairwell are covered with vinyl flooring. Stairwells are masonry plastered and decorated. There are lobbies which provide entrance to 2Nr flats at each storey level.
- 2.3.5 The bungalows are of cavity masonry construction with solid internal walls, plastered and decorated or papered, solid floor carpeted or vinylated. The townhouses are same but with suspended timber upper floors. The flats are of concrete frame construction with assumed masonry cavity infill. Each unit is decorated and furnished as accords status of the demise (tenant, leaseholder, freeholder).
- 2.3.6 Generally, each unit is connected to estate communal gas boiler with an independent hot water cylinder (jacketed nominal 80mm insulation typical) and cold water storage tank, housed in loft void or cupboard. Certain leaseholder/ freeholder dwellings where accessed have independent condensing combination gas boilers.
- 2.3.7 Access to loft voids is generally via top storey ceiling hatches. This is the case in the townhouses and top storey maisonette flats. Though it does not appear possible to access all areas of the bungalow loft voids (i.e. monopitch section over kitchen).
- 2.3.8 Immediately surrounding the building, the ground is paved with concrete flagstones. This includes the below ground level of the block of flats.
- 2.3.9 Front and rear gardens are generally secured and bounded by brick walls with timber picket style fences atop and timber gates. There are sections of lawn with mature trees and bushes among the concrete flagstones.
- 2.3.10 There is no level access to the lower ground area of the block of flats or moving between levels generally.

2.4 Previous planning application

- 2.4.1 From the record obtained from the online planning application search in May 2022, there has previously been 1Nr planning application related to the property.
- 2.4.2 We note several of the units have had windows changed to UPVC casement windows which differ from the original sliding sash aluminium sliding sash.
- 2.4.3 We also note a similar Planning application to Denton Estate in Chalk Farm in 2015 where similar proposals were put forward and approved.

Application Number	Site Address	Development Description	Status	Date Registered	Decision
<u>2008/5041/P</u>	Brookes Court	Alterations and extensions including	FINAL DECISION	14-11-2008	Granted

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	Baldwins Gardens London EC1N 7RR	the erection of a single storey extension at ground floor level to the community hall (Class D1).			
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3.0 Design

3.1 Description of Proposal

3.1.1 London Borough of Camden would like to demonstrate the possibility of whole house deep retrofit for its buildings within or close to a conservation area, to serve as a demonstrator on how to increase energy efficiency, improve thermal comfort (such as eliminating draughts) and occupant health, and achieve better moisture and ventilation control within the property, reduce CO2 emissions and energy demand for heating and hot water. Importantly, the project aims to reduce residents' energy bills and fight against fuel poverty. The project seeks to undertake a whole house deep approach addressing fabric measures and ventilation. The services elements (i.e. energy, power and heating) are to be addressed in the medium term and are to be assessed as part of a medium term plan under PAS 2035. The project is funded by Social Housing Decarbonisation Funding and is required to follow and comply with the PAS 2035 methodology for whole house fabric-first deep retrofit to minimise technical moisture and ventilation risks and prevent unintended consequences such as overheating or unsuitable ventilation control.

3.1.2 We are proposing a fabric first approach to insulate the building to provide a generally airtight, thermally efficient environment with adequate mechanical ventilation to remove stale air, moisture, and contaminants and ensure adequate supply of fresh air.

3.1.3 We are proposing external wall insulation (EWI) with Permarock mineral fibre insulation of 210mm thick insulation layer, finished with brick slips to match existing appearance and similar to adjacent properties. This will allow to refresh the estate in line with attached Heritage Officer's Note, and provide a reliable and durable finish to the improved facades. Certain elevations or members such as projecting balconies which will not be insulated are proposed to be left in their original finish as per the 2015 Denton EWI scheme. Concrete members such as ring beams and soffits will likewise be finished to match existing. The system provides a vapour permeable insulation with A2 fire rating to the building. We attach samples of the brick slip finish for your reference (including marked up brochure from Permarock with suggested RAL colours). *Please note: brick slips submitted as sample are of special mix to match existing appearance.*

On certain flank and rear elevations (notably flanks of block of flats, east rear elevation of bungalows, and southern flank of townhouses 29-32), due to site constraints i.e. narrow to limited access, internal wall insulation (IWI) with high specification, 100mm insulated plasterboard is proposed internally. Some initial detail and high level thermal modelling calculation is included in this Application. Elsewhere, to avoid thermal bridging at EWI - IWI junctions, a c. 600mm overlap is recommended to mitigate worst impacts of the thermal bridge. EWI is proposed for the block due to practical reasons as 1. To minimise the disruption to resident when all the units are occupied and 2. To prevent reduction on living space within small units.

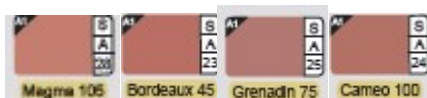


Figure: proposed EWI finishes options additional to brick slip special mix

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- 3.1.4 A high specification, thin aerogel panel (10mm insulation with 9mm rigid carrier board) is proposed to bungalow and townhouse courtyard areas, gardens, and flat balconies to avoid significant or unacceptable loss of amenity space.
- 3.1.5 We are currently in discussion with London Borough of Camden and Highways as to installation of EWI over estate thoroughfares or public pavements and have had initial discussions which have been encouraging and have confirmed the scheme is feasible.
- 3.1.6 To facilitate the installation of loft/ roof insulation and EWI, we are proposing an extension of the eaves (~210mm). The present mansard roof sections are believed to be close-boarded and directly adjacent habitable spaces. The proposal would be to strip the roofs and insulate over with a warm-roof type construction which would reduce disruption internally and entail an extension of the mansards or raising of the lean-tos. Roof lines to townhouse lean-to roofs would rise by ~100mm. This then necessitates extension of the shoebox roof eaves at the flats and townhouses. There would be no works to top sections of the shoebox roofs, apart from these gable extensions. Slates would be replaced to match existing in modern material. In the case where slates are asbestos slates, these would be replaced wholesale with a fibre cement slate to match existing.
- 3.1.7 We propose to thermally insulate parapet gutters with a proprietary liquid solution which will also improve weathertightness. Gable and parapet walls where forming part of the main external envelope or presenting a thermal bridge are proposed to be similar insulated with the ~210mm EWI. To protect the head of the insulation and comply with PAS 2035, a powder-coated proprietary aluminium capping in anthracite grey is proposed. These will have minimal visual impact from the street level and should not significantly affect the overall aesthetic of the building. Proportions in the building's original make-up and construction shall generally be maintained or improved.
- 3.1.8 We also propose replacing windows and doors to the property. Currently, the properties generally have original aluminium single glazed sliding sash windows which are not performing, thermally inefficient to modern standards, and variously in disrepair. These are generally housed in original painted timber frames. Front entrance doors are a mixture of timber framed, single glazed Georgian wire doors (to the bungalows), timber/ metal composite or timber flush doors (to townhouses and flats, where set in inset porches or internally away from the street scene). Rear exit doors are typically timber framed, single glazed Georgian wire doors. In some cases, such as to top floor flat maisonette dwellings, rear balcony doors have been replaced with PVCu double glazed balcony doors with PVCu glazed side panels. To avoid thermal bridges after installation of the EWI, the new windows and doors will be moved to the level of EWI which will match the existing appearance. The new windows proposed are slim double glazed top hung aluminium windows for cleaning by residents.

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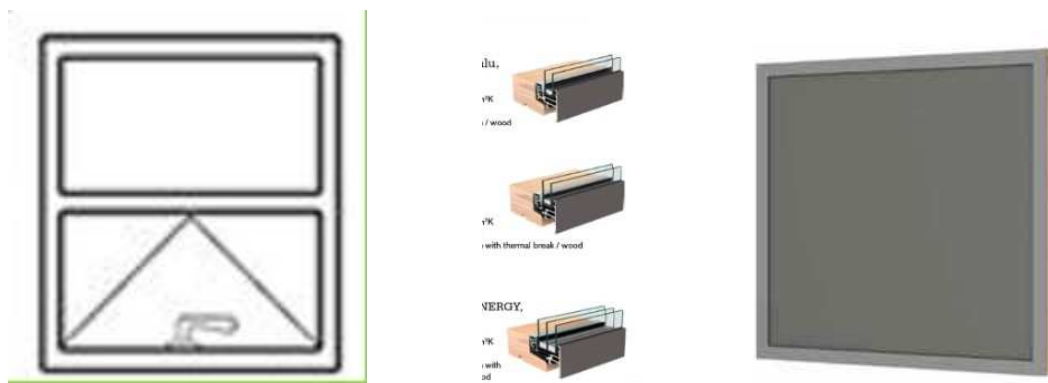


Figure: proposed window opening arrangement Figure: Indicative window colour Figure: window sandwich panel

- 3.1.9 We would like to discuss this option with the Planning department as casement windows perform better thermally and from an energy efficiency perspective than sliding sash windows. The doors to the flat dwelling entrances and townhouses shall be double glazed timber or flush doors with spyhole and relevant fire and security accreditation, and doors to bungalows shall be double glazed aluminium doors to match existing in appearance. The intention would be to retain existing arrangements of glazed door and window fixed lights and side and base panels, though we would recommend those panels at the base of units are replaced with unglazed insulated panels for improved thermal performance. Being at low level, these panels are not easily visible from the street and the provision of glazing in the replacement windows and doors shall allow for sufficient daylighting through the dwelling. Thus, this proposal should help to unify the appearance of the street.
- 3.1.10 As we are improving the thermal performance of the fabric, there is a proposed upgrade/renewal of the existing ventilation system to prevent unintended consequences of poor humidity/ moisture control. Currently there are variously decentralised mechanical extract fans to kitchens and bathrooms though these do not occur throughout, some are not present, faulty or not working. We propose a centralised demand-controlled mechanical extract system generally, though this is to be confirmed whether to flat dwellings sufficient space exists, in which case a decentralised operable system to match existing would be proposed. It is foreseen that there will be no change in external appearance of the main envelope as seen from the street as a result of the works.
- 3.1.11 As part of the PAS 2035 process a medium-term plan shall be formulated to propose possible options for replacement/ upgrade of the existing heating and hot water systems to renewable systems in future. This shall have regard to buildability of future measures alongside the present proposed works and need to mitigate risk of damage or compromise of the fabric measures when services upgrades are undertaken. While required for PAS 2035 compliance, this aspect of the works falls outside the scope of this Planning Application. For clarity, there are no proposed changes to the heating, energy and hot water systems as part of this application.

4.0 Technical Design Considerations

- 4.1.1 The proposed EWI system has a British Board of Agrément Certificate for the system design and installation. The British Board of Agrément (BBA) is a construction industry approvals body. Only products and systems that have passed a series of comprehensive assessments, which include laboratory tests, on-site evaluations, quality management checks and inspections of production are awarded a BBA Certificate.

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- 4.1.2 The design and installation will comply fully with the requirements of the Building Regulations, in particular Part F (Ventilation) and Part L (Conservation of fuel and power).
- 4.1.3 The following is a number of key considerations (non-exhaustive list):-
- 4.1.4 An appropriate number of site-specific pull-out tests will be conducted on the substrate of the building to ensure the mechanical fixings will adequately support and transfer the weight of the render insulation system to the substrate wall.
- 4.1.5 The wind loads on the walls will be calculated to ensure the correct number of the mechanical fixings are used.
- 4.1.6 The existing cavity wall will be opened up to establish the existing cavity width and the presence and condition of existing ties. Cavity wall insulation will be checked and replaced where found to be defective.
- 4.1.7 The risk of both surface and interstitial condensation will be analysed to ensure risks are sufficiently mitigated.
- 4.1.8 The proposed EWI system will be a 'breathable' system.
- 4.1.9 Background ventilation (trickle vents to windows) will be installed as part of the mechanical extract system.
- 4.1.10 The ventilation will be upgraded in the form of a centralised or decentralised mechanical extract system for each dwelling with wall or roof-mounted flues to match existing.

5.0 Environmental & Sustainability Benefits

- 5.1.1 The external wall insulation works are being proposed to help meet two key public benefit commitments - reducing carbon emissions and reducing the risk of fuel poverty - under the Sustainable Neighbourhoods theme in the Camden Plan:
- 5.1.2 "Green Action for Change: Camden's environmental sustainability plan (2011- 2020) commits Camden to a 27% borough wide Carbon Dioxide (CO₂) reduction by 2017 and a 40% borough wide CO₂ reduction by 2020 (London carbon reduction target). Over 90% of Camden's carbon dioxide emissions are produced by the operation of buildings."
- 5.1.3 "In assessing applications for retrofitting sustainability measures to [...] buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty."
- 5.1.4 External wall insulation is the most effective means of improving thermal comfort and reducing heating costs and CO₂ emissions for Camden's residential properties. It is not possible to predict actual energy, heating cost or CO₂ savings arising from the proposed measures (please see the notes following the figures below) but recent interim modelling of Camden's stock by an external consultancy has enabled the following projected estimated impacts of installing external wall insulation:
- 5.1.5 Per dwelling average CO₂ saving – 0.71 tCO₂ (28.6%) per year, lifetime total (over 36 years) 26.0 tCO₂.
- 5.1.6 Whole project estimated CO₂ saving – 63.8 tCO₂ per year, lifetime total (over 36 years) 2,296 tCO₂.

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5.1.7 Fuel Poverty

5.1.8 A household is considered to be in fuel poverty if their domestic energy costs are above average, and after paying them, they would be left with an income below the official poverty line.

5.1.9 Key determinants of fuel poverty are: household income, energy efficiency of the home and domestic energy prices.

5.1.10 Vulnerable residents can move in and out of fuel poverty as a result of changes to household income levels. Camden therefore seeks to support all low-income households and to improve the energy efficiency of as many dwellings as possible.

5.1.11 Unlike shorter term changes to income levels and reductions in domestic energy costs, improving the energy efficiency of the home is a permanent solution to fuel poverty.

5.1.12 Recent interim modelling of Camden's stock by an external consultancy has enabled the following projected estimated impacts on the risk of fuel poverty:

5.1.13 The average SAP rating moves from band D (64.4) to band C (72).

5.1.14 Average heating cost savings after EWI estimated at £147 per year (21.4%).

5.1.15 Risk of incidence of fuel poverty is reduced from 8.9% of dwellings to 0.9%.

5.1.16 Notes and qualifications:

5.1.17 The figures above are modelled based on the housing stock data and surveys. Some of this data has assumed values.

5.1.18 The modelling assumes standard occupancy conditions, and does not take account of differences in resident behaviour or any "comfort taking" (where some of the increase in energy efficiency is used to provide a higher internal temperature, thus reducing the energy savings). It does not include an "in use" factor to take account of the difference between modelled and observed savings.

5.1.19 It is not possible to predict actual energy savings as this would require knowledge of current consumption, future resident behaviour and future variations in external factors.

5.1.20 A more accurate assessment of modelled impacts will be available from the Energy Performance Certificates which will be produced for each unit as a result of the claiming funding from SHDF (Social Housing Decarbonisation Fund).

5.1.21 The risk of incidence of fuel poverty is assessed by applying national rates of Fuel Poverty by SAP band to the number of properties in each band.

5.1.22 In addition to these benefits, the improved thermal comfort and reduced heating costs will lead to a reduction in the risk of cold related ill-health, and to improved social and economic outcomes for vulnerable residents.

5.1.23 Opportunities for Further Reducing Impacts and Heating Costs

5.1.24 Residents don't have heat meters so the savings will initially be shared among Camden's heating pool (all tenanted properties across the borough without heat meters). Leaseholders at Brookes Court will benefit as they pay a proportion of actual consumption in the estate. However, going forward Camden will be retrofitting HPs to its housing stock so we are future proofing Brookes Court in that regard.

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- 5.1.25 Reducing heating losses by insulating the walls and upgrading windows and doors should enable residents to stay warm by using less heat, and would reduce the risks of consumption charging, and allow residents to gain more control of their heating and bills.

6.0 Scale

- 6.1.1 By installing the 210mm thick EWI, the building scale will be changed slightly, as the wall becomes thicker.
- 6.1.2 Top roof pitches will be extended at the eaves to provide protective overhang to the new EWI.
- 6.1.3 Single storey lean to roofs to rear of the townhouses will be raised approx 100mm.

6.2 Appearance

- 6.2.1 The proposal will slightly change the building proportion due to the external wall insulation.
- 6.2.2 Balconies areas receiving thinner profile 10mm Aerogel insulation and brick slip render and projecting balcony faces and returns would retain the original façade finish to save costs on unnecessary insulation and retain some of the original aesthetic (as indicated on attached drawings/ plans)
- 6.2.3 The building will be improved in appearance by the new brick slip render finish with upgraded and refurbished facades naturally blending in with the adjacent streetscape.
- 6.2.4 Railings and fences will be reinstated after the EWI works.
- 6.2.5 With the introduction of new architectural features, it is believed that these measures provide a balance between enhancing the aesthetic appearance and respecting the age and style of the building.

7.0 Access

- 7.1.1 The proposed development does not make any alterations to the existing access arrangements.

8.0 Planning Policy

- 8.1.1 The National Planning Policy Framework 2012 (NPPF)
- 8.1.2 The National Planning Policy Framework 2012 (NPPF) sets out the Government's planning policies and how these are expected to be applied. Several sections are relevant to the proposals at 1-32 Brookes Court.
- 8.1.3 The NPPF It makes clear that local authorities should adopt proactive strategies to mitigate and adapt to climate change and, to support the move to a low carbon future, local authorities should actively support energy efficiency improvements to existing buildings.
- 8.1.4 Section 65; states '...planning authorities should not refuse planning permission for buildings...which promote high levels of sustainability because of concerns about incompatibility with an existing townscape if those concerns have been mitigated by good design...'
- 8.1.5 Section 95; it states that Local Planning Authorities should '...actively support energy efficiency improvements to existing buildings.'
- 8.1.6 Local Development Framework

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- 8.1.7 CS13: 'Tackling climate change through promoting higher environmental standards'
- 8.1.8 The above core strategy policy states that the Council will take a lead in tackling climate change by taking measures to reduce its own carbon emissions.
- 8.1.9 It also states that they will have regard to the cost of installing measures to tackle climate change as well as the cumulative future costs of delaying reductions in carbon dioxide emissions. This is of particular relevance as a result of the ability to utilise funding for retrofit from Social Housing Decarbonisation Fund (SHDF), to reduce the cost to Camden council of undertaking the scheme.
- 8.1.10 DP22. Promoting sustainable design and construction
- 8.1.11 DP22, which should be read in conjunction with Core Strategy policy CS13, states:
- 8.1.12 'Promoting a sustainable Camden is an integral element of our Local Development Framework Strategy'
- 8.1.13 'Measures to tackle climate change are integral in the development process and are a priority of the Council.'
- 8.1.14 Local Plan (Draft)
- 8.1.15 8.3.1 D2 Heritage:
- 8.1.16 Sustainable design and retrofitting
- 8.1.17 7.40 Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving – preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas, and the English Heritage website.
- 8.1.18 On heritage, any development should: "...conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations."
- 8.1.19 A Heritage/ Conservation Officer is being engaged as per the Camden Retrofit PPA and Energy efficiency planning guidance, a producing Conservation Area Statement or Appraisal.
- 8.1.20 On energy conservation, any development should: "...support the transition to a low carbon future... (and) encourage the reuse of existing resources, including conversion of existing buildings and encourage the use of renewable resources."
- 8.1.21 Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival.
- 8.1.22 Camden Planning Guidance
- 8.1.23 The Camden borough wide "Energy efficiency planning guidance for Conservation Areas", states in section 3.4 that:

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- 8.1.24 “energy efficiency measures and renewable energy technologies can generally be said to benefit the wider public by virtue of the contribution they make to controlling domestic energy costs, reducing fuel poverty and mitigating against the risks of climate change”.
- 8.1.25 Although the guidance is specifically for conservation areas, we consider that the same interpretation can be given to the Brookes Court Estate as it is sited opposite the Hatton Garden Conservation Area and in close proximity to several Listed or Locally Listed Buildings.

9.0 Summary

- 9.1.1 The Works offer clear public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty.
- 9.1.2 Proposals will seek to limit changes to the appearance and proportions of the building and take into consideration the property scale and significance
- 9.1.3 The Works shall aim to sensitively alter and retrofit the building.
- 9.1.4 The design shall consider wide range of factors that will influence whether a measure will be effective, appropriate and acceptable in planning terms • decide which of these measures to introduce and in what order • develop a ‘shopping list’ of measures that are appropriate to install • appoint professionals and contractors to carry out the work • identify the interdependencies as well as the long-term opportunities presented by the improvements.
- 9.1.5 The design shall undertake detailed technical modelling and energy calculations using SAP methodology to understand technical risks and optimum energy efficiency outputs for the improved fabric. Pre-works surveys including thermal imaging and airtightness surveys shall assist in determining baseline performance for improvement.
- 9.1.6 The Works shall follow a PAS 2035 whole house deep retrofit approach fully assessing the property existing condition, technical risk, and provide an holistic recommended set of most suitable, effective, compliant and accepted measures using carbon cost effectiveness metrics, as well as assessing individual user requirements, controls and needs and repairing and maintenance obligations and requirements. The Works shall ensure improvements are suitable, proportionate, timely, well integrated, properly coordinated, effective and sustainable, and helps to highlight and resolve uncertainties, reconcile conflicting aims, and manage the risks of unintended consequences, dealing with specific situations as opposed to generalities. Works shall be installed in accordance with PAS 2030 by accredited installers supported by TrustMark accreditation.
- 9.1.7 Camden’s Capital Works Team are progressing on retrofitting existing Camden properties to reduce their carbon footprint by improving their energy consumption, space standards and overall wellbeing of occupiers.
- 9.1.8 Given the significant contribution existing buildings make to Camden’s CO2 emissions as well as the Council’s declaration of a climate and ecological emergency, these proposals are recommended as they seek to sensitively improve the energy efficiency of existing buildings.
- 9.1.9 The proposed works are needed to ensure a high level of thermal improvement is achieved to the existing property. The council and its residents have been consulted through the design process to ensure that the design is the best solution to improve thermal performance, reducing carbon emission and fight against fuel poverty.
- 9.1.10 The application is designed to provide be site-specific and avoids any negative impact on the surrounding area and on neighbouring properties.

Design, Access and Heritage Statement

1-32 Brookes Court Retrofit

- 9.1.11 The scheme's design considers the neighbouring context as well as the existing planning policy documents, providing a development, which enhances its immediate surroundings.
- 9.1.12 The structure and content of the statement have been informed by the Department for Communities and Local Government (DCLG) Circular 03/2014 Guidance on Changes to the Development Control System (12 June 2006) and Design and Access Statements: How to Write, Read and Use Them (CABE, 2006). Design guidance is taken from the National Planning Policy Framework (NPPF), Barnet's Planning Policy's 1 and 2 (2012) and Supplementary Planning Documents.
- 9.1.13 We trust that the Planning Department can support this application and recommend approval to the local members.