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H571_3-5 BEDFORD ROW
Housing Study_Revision B
October 2022

REVISION LOG:

/	June 2022	Pre-Application 2 Addendum	Planning Issue
A	July 2022	Draft	Design Team Issue
B	October 2022	Planning Submission	Planning Issue

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1.0 HOUSING STUDY

This housing study accompanies a planning application for the continued office use at 3-5 Bedford and 3-5 Jockey's Fields, WC1R 4BU.

Camden's Local Plan Policy H2 states that where non-residential development is proposed involving additional floorspace of more than 200sqm (GIA), the Council will seek 50% of all additional floorspace to be self-contained housing.

The proposal involves an uplift in floor area of 705sqm (GIA). Accordingly, the professional team has considered the impact of integrating 352.5sqm of residential floorspace into the scheme. The Council's Housing CPG indicates that this level of floorspace should give rise to a capacity of 4 units.

Under Policy H4g and the Housing CPG, there is no requirement to deliver affordable housing as the quantum would be significantly fewer than 10 units. This study therefore considers the integration of market housing on-site.

The policy test is whether such provision on-site would be practical, or whether housing would be more appropriately provided off-site. Policy H2 indicates that greatest scrutiny will be given to proposals larger than this where the additional floorspace is 1,000sqm or more. The assessment is subject to several considerations (H2a to j) including whether self-contained housing would be compatible with the character and operational requirements of the office use (d), its impact on the efficiency and overall quantum of development (h), and whether an alternative approach could deliver a better outcome (j).

Where the Council is satisfied that providing on-site housing is not practical, or housing would more appropriately be provided off-site, Policy H2 seeks provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

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

To support the aims of Policy H1, where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses.

- In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.
- In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations.

In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:

- a. the character of the development, the site and the area;
- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

Where housing is required as part of a mix of uses, we will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. 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.

In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:

- f. the need to add to community safety by providing an active street frontage and natural surveillance;
- g. the extent of any additional floorspace needed for an existing user;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

In the Central London Area and the town centres listed in this policy, where provision of self-contained housing is required but the development's provision of housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution. The deferred contribution will be based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible.

2.0 ON-SITE ASSESSMENT

2.1 OVERARCHING AIM OF THE DEVELOPMENT

Planning policy at all levels indicate that great weight should be given to conserving a listed building and, where it is vacant, bringing it back in to use. London Plan and Local Plan policies for the Central Activities Zone support and protect employment sites.

The fundamental purpose of this development against which the integration of housing should be considered is to secure the future of the grade II listed building, as an office. It has a long association with office use, however, has been vacant for approximately 2 years and there has been little interest from occupiers despite a marketing campaign by 2 agents.

There has been direct feedback received through the marketing process that there are currently significant deficiencies which deter occupiers, including its poor, sub-divided and complicated configuration, state of repair (it was last refurbished in 2005), sustainability credentials (the current EPC rating is E) and lack of amenity, including external, space. The office has changed for many since the pandemic, and this has influenced demand with a 'flight to quality' trend emerging. To achieve a new letting/s, improvement to the quality of office accommodation here is critical and therefore should hold great weight.

Furthermore, the Council has recently published a Housing Delivery Test Action Plan (July 2022), which includes a series of actions to ensure that Camden meets its housing requirement in future years. The Plan does not refer to the introduction of housing under Policy H2 within small and tightly constrained listed buildings, which this is, as a source. Instead, it promotes other sources, supporting the Council's own investment programme in affordable units particularly, which a financial contribution from this scheme could be directed.

2.2 TECHNICAL REQUIREMENTS

Advice has been received from the Approved Inspector, specialist fire and M&E consultants on the technical requirements necessary to support the introduction of any residential accommodation within the scheme.

It would be necessary to introduce the following at basement level:

- > An automatic sprinkler system to commercial specification because of the introduction of residential. A compliant system would require a tank with a capacity of 145m³, plus pumps (100sqm). This sprinkler system would be needed wherever the residential accommodation would be located within the building, be that basement, ground, or any of the upper floors.
- > Backup emergency diesel generators for the sprinkler system (25sqm).
- > A residential mechanical and electrical plant room (10sqm).
- > Lift pit (5sqm).

At ground floor level it would be necessary to provide:

- > A sub-station (25sqm) with direct street access. The introduction of residential accommodation to the scheme would necessitate the provision of a UKPN substation within the building due to the increased electricity load placed upon the building. The increased load arises from two elements; firstly, the dwellings themselves which would require all electrically served systems including heating, hot water, and cooking facilities and secondly, the provision of the fire suppression sprinkler system and associated plant. Sprinkler pumps would be onerous in their connected electrical load as well starting condition characteristics.

Therefore, 165sqm of the 352.2sqm policy requirement (47%) would be taken up by plant at basement level and ground floor level which is very inefficient. This requirement would be needed to

2.3 OPTIONS

support the provision of residential accommodation of any scale and in any location within the building.

In addition, it would be necessary to provide the following at ground floor and above which would have a variable additional space requirement depending on the number, size, and location of units:

- > Separate bin and bicycle stores.
- > A separate stair core and lift serving the residential accommodation only.
- > Core circulation.
- > A separate dry rising main.
- > Ventilation and residential riser to the stair core. Lift over-run to the roof, together with additional external, roof top, condenser plant.

There would be approximately 63 tonnes CO₂e of additional embodied carbon associated with constructing the sprinkler tank and a second core. This would comprise approximately a quarter of the LETI 2030 design target allowance (to meet climate change targets) for the structural element of the scheme and would most likely result in the development exceeding the allowance. There would be additional energy consumption through the extra plant installations giving rise to an extra electrical connection load of 10kW. These facts would not appeal to the high ESG expectations of office occupiers. Furthermore, it is likely that the proposed residential units (under each of the tested options) would struggle to achieve the BREEAM Domestic Refurbishment requirements for daylighting, sound insulation, inclusive design and accessibility, security, and renewable technologies.

Nevertheless, the arrangement of these technical requirements has been shown in the accompanying options. Several attempts have been made to fit the residual floorspace of the policy target into the scheme as habitable accommodation. It has proven very challenging.

The Bedford Row element of the development has been in a commercial use since the mid-18th Century and is the primary commercial space of the scheme. As discussed with Officers during the pre-application process, consideration has therefore been given to the incorporation of the housing into different levels of the Jockey's Fields element, which would be least disruptive to the overall scheme.

The basement has not been tested because of the plant requirements at that level and because it has no external frontage making it entirely unsuitable for living accommodation.

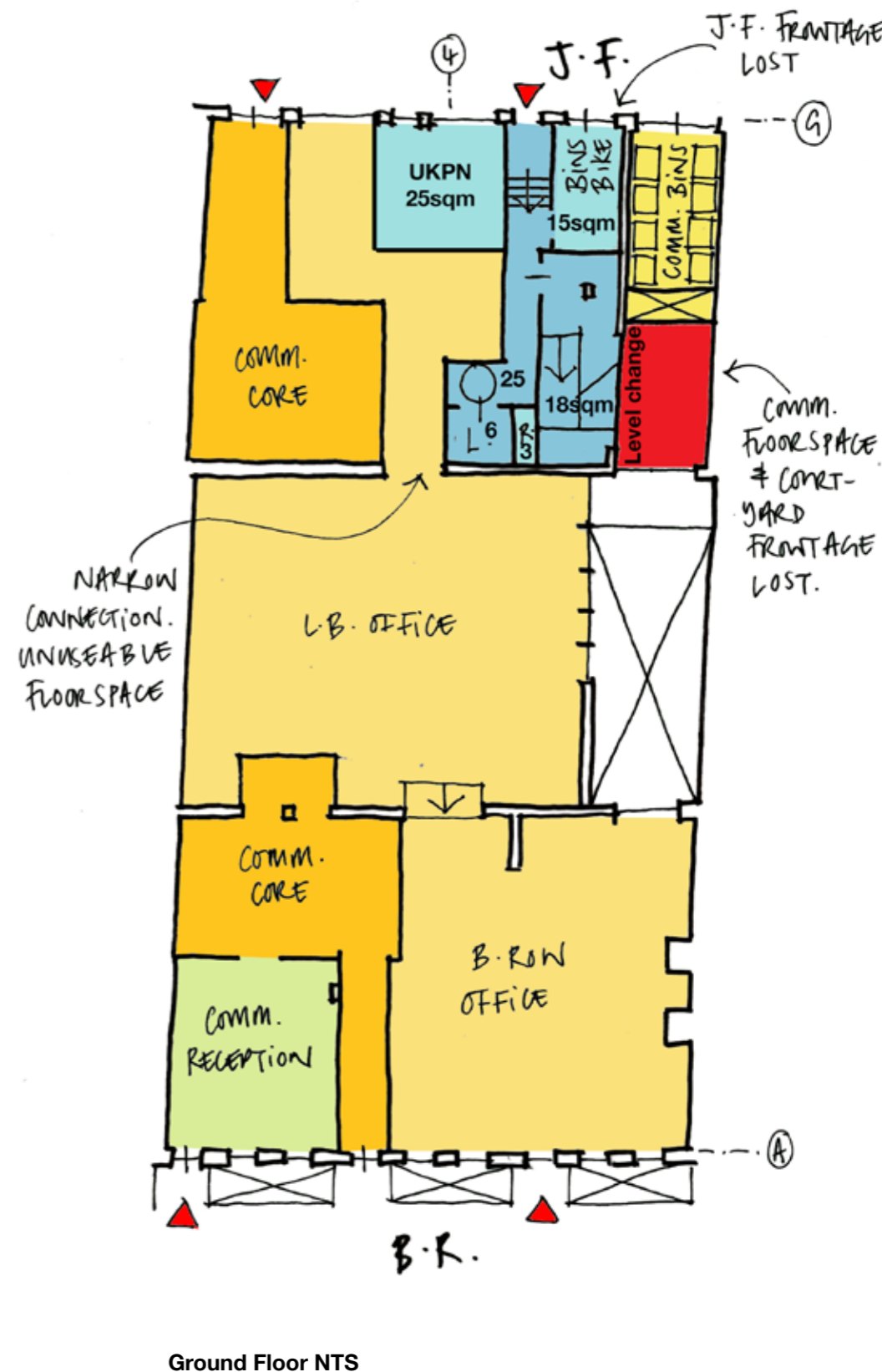
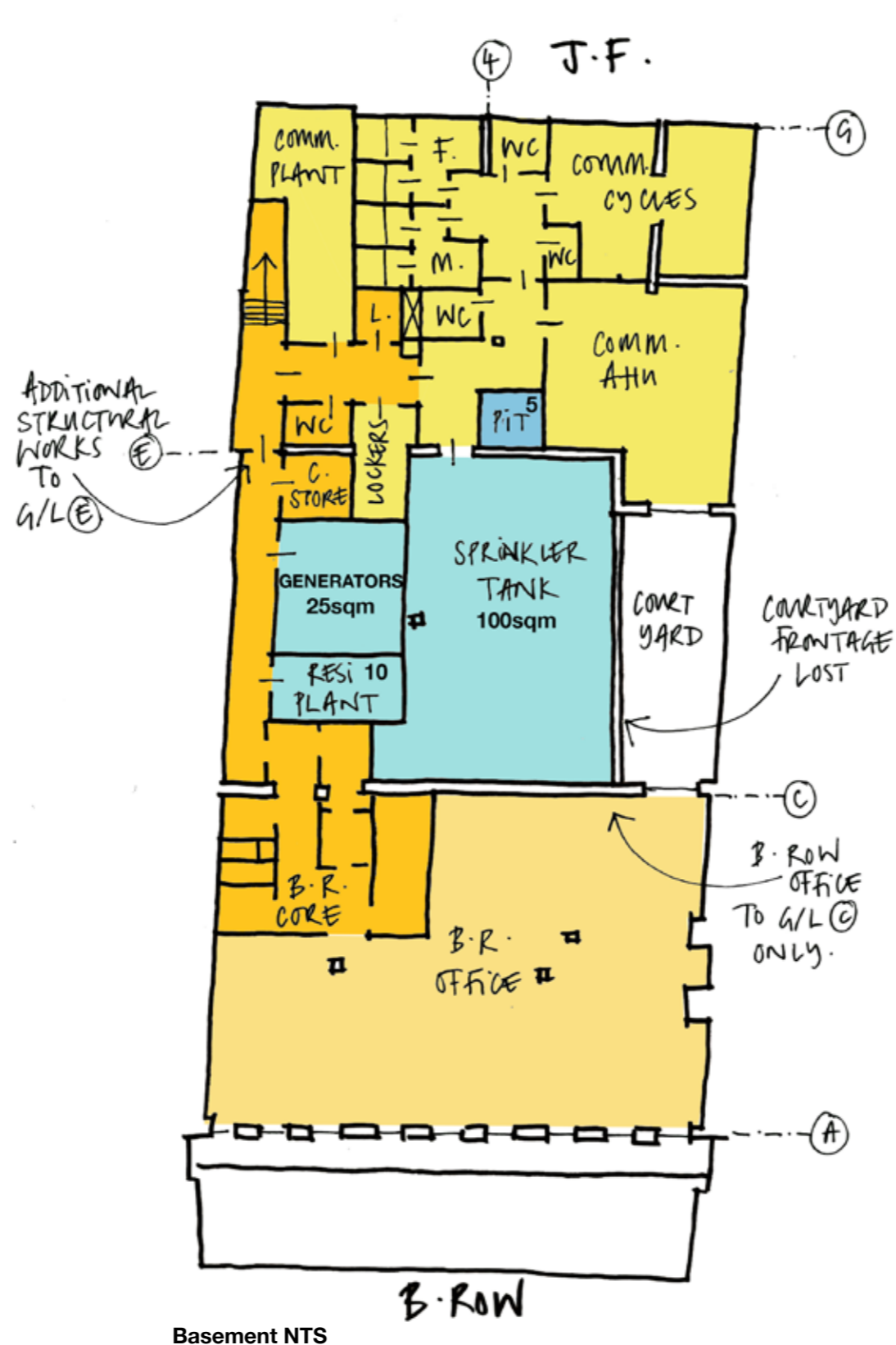
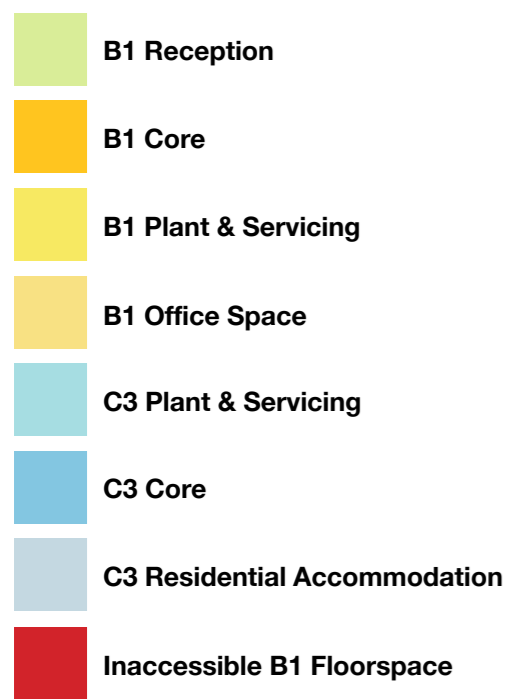
2.4 OPTIONS: RESIDENTIAL AT THIRD FLOOR LEVEL

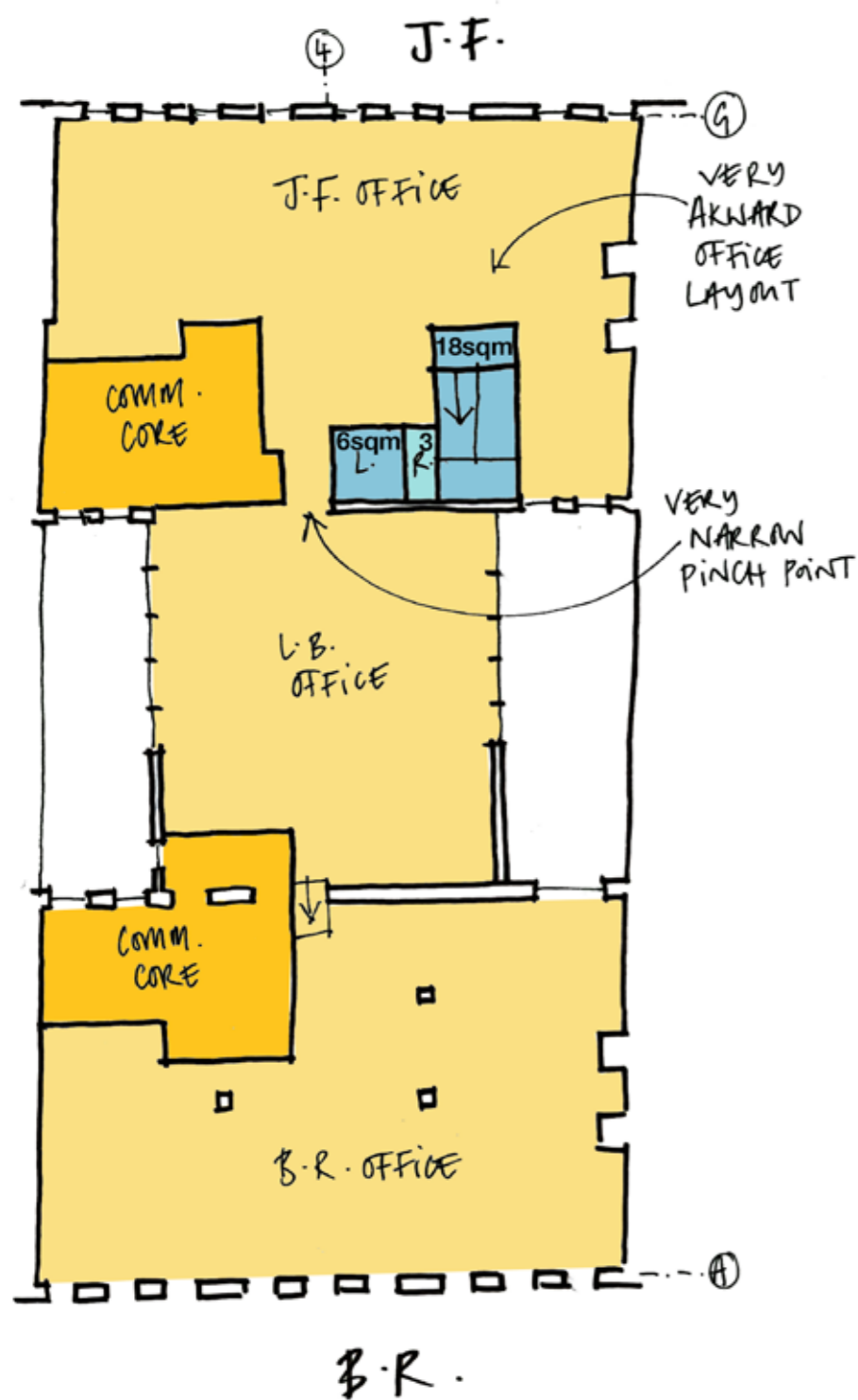
Approach

This first option looks at placing residential floorspace to the new third floor of the Jockey's Fields block.

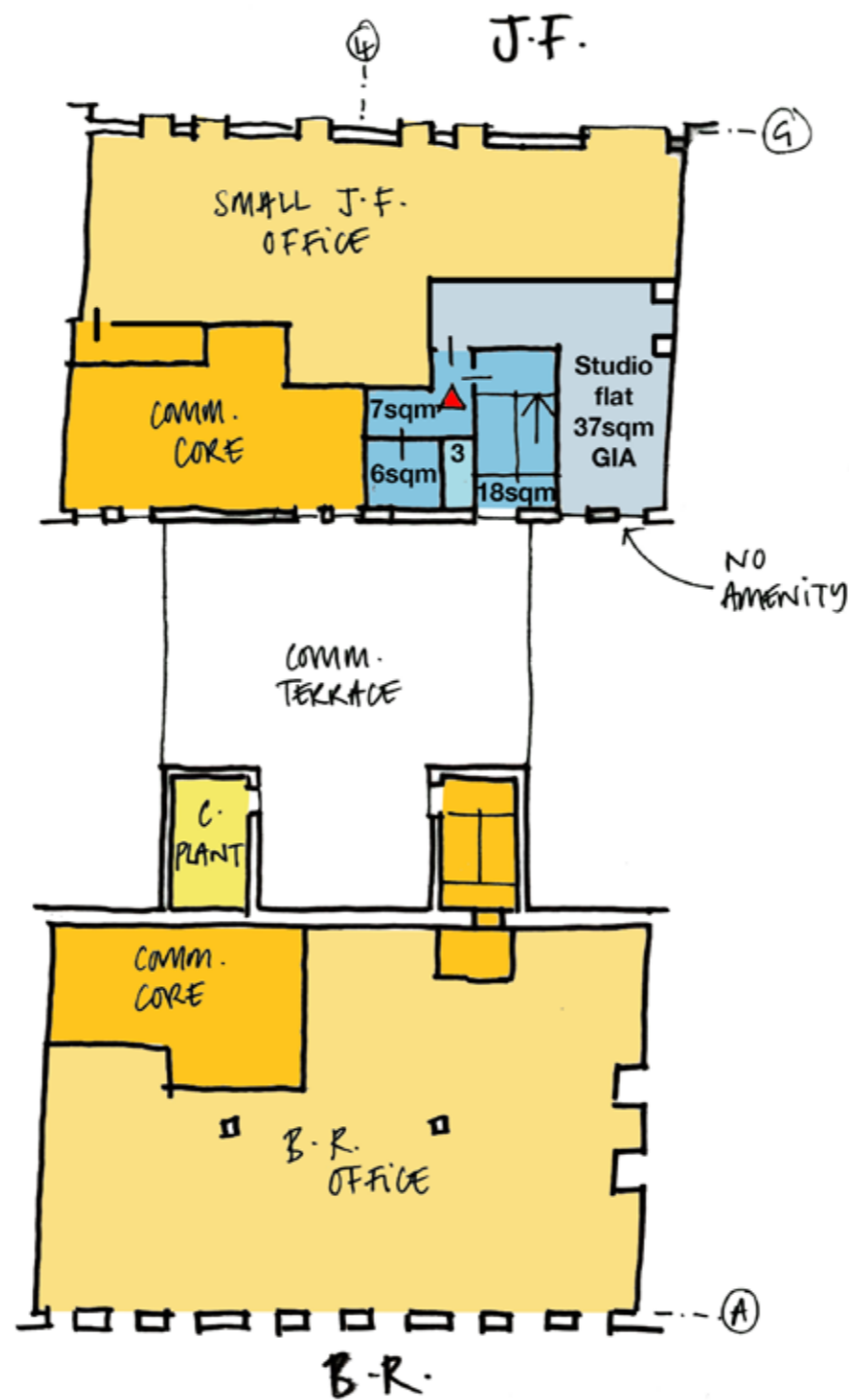
After access, plant and servicing are provided to facilitate residential use, the GIA target remaining is 32.5sqm which is not sufficient for a flat compliant with the London Plan or LB Camden housing standards. However, to test the principle, a single studio flat of 37sqm GIA is drawn, exceeding requirement.

The first step was to position the residential access core opposite the commercial core, in order that the office floorspace can also access the core. The lift and stairs have been located in the darkest area of the plan to free up frontage at basement level nevertheless some unusable floorspace is annexed at ground level because the layout is very awkward.





First & Second Floors NTS



Third Floor NTS - One Bed Flat
(exceeding GIA required under policy H2)

Areas

Residential GIA by floor:

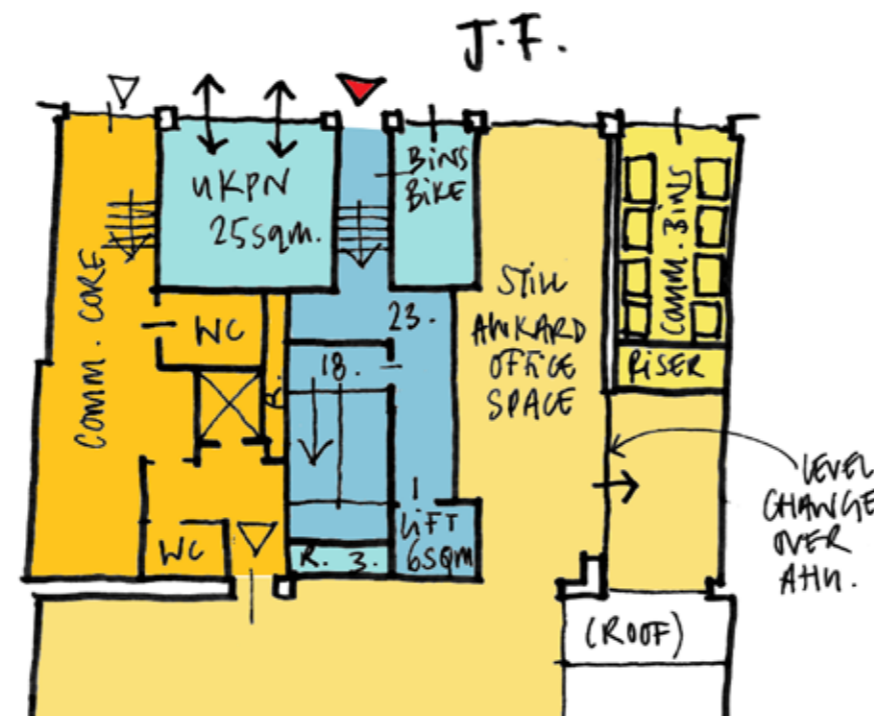
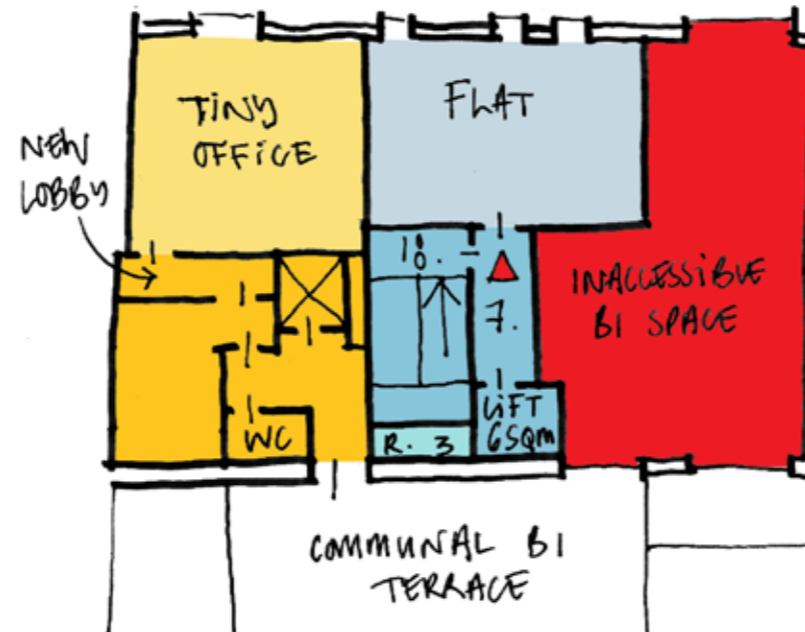
Basement	140sqm
Ground	92sqm
First	27sqm
Second	27sqm
Third	34sqm core + 37sqm flat
Total	357sqm (exceeds req.)

Residential GIA by function:

Plant & Servicing	192sqm
Core & Circulation	128sqm
Accommodation	37sqm
Total	357sqm (exceeds req.)

Alternative Core Position

For completeness, an alternative core position has been considered, adjacent to rather than opposite the B1 office core. This aims to leave more useable office floorspace around the residential functions at ground floor level. however the effect of this is to create even more inaccessible floorspace from the B1 core at third floor level and does not make residential functions any more spatially efficient over ground-to-second floor levels. This is entirely impractical.



Ground and Third Floor NTS - Residential Core to Left Hand Side (Dismissed)

Inefficiency and wastefulness

This option in its entirety would provide 3,390sqm of floorspace, however, 1,240sqm would be either core, or plant. This translates into an overall efficiency of 63% which is very significantly below the normal percentage expected, particularly set in the context of the current unprecedented inflation of construction costs. The efficiency of the application scheme for this site is 73%, and other recent refurbishments and extension on Bedford Row also have significantly better net to gross ratios. 46 Bedford Row 76% and 48 Bedford Row 71% for example.

Within the scheme, the overall quantum of useable office floorspace would be reduced to 2,150sqm, or 2,186sqm including the reception, which is less than the existing quantum of usable office accommodation within the building (2,287sqm NIA). There would therefore be no contribution to the Council's policy aim to increase offices and therefore jobs within the Central Activities Zone.

In terms of the residential, incorporating the plant requirements and core up to third floor level, together refuse and cycle stores would use 320sqm of the H2 policy target and leave only 32.5sqm for accommodation/habitable rooms. Indeed, this is below the minimum size of a studio unit, albeit a studio of 37sqm is shown in the sketch, exceeding the policy target. Accordingly, only 10% of the floorspace would be useable. Only 1 studio would be provided whereas the Council's Housing CPG expects 4 units. The studio would represent 0.1% of the Borough's annual housing target which would be de-minimis and it would not contribute to the Council's high priority market housing types which are 2 and 3-bedroom.

Negative impact on the quality and layout of the office accommodation

The introduction of residential would result in the entirety of the basement from Jockey's Fields to the rear of the Bedford Row element, being consumed by plant and other installations. It would no longer be possible to draw light into the basement office accommodation within Bedford Row from the courtyard garden and therefore, that accommodation would not be improved at all, and it would be hard to let.

At ground floor, the office layout would be compromised through the residential core, resulting in the loss of useable office accommodation including any office space fronting Jockey's Fields. This would instead be replaced by a 'zig-zagging' corridor to the balance of the office. Furthermore, there would be some completely inaccessible space because of the complexity of accommodating the various requirements.

Higher up in the building, there would be 2 significant impacts due to separate and distinct residential and commercial cores. There would be a loss of natural light shared between the areas fronting Jockey's Fields and the link due to the core blocking light. The Jockey's Fields office space would also be disconnected from the balance of the space. This coupled with the low floor to ceiling heights that exist within this part of the scheme would make the space less useable for an occupier and again inevitably impact on the ability to let the space.

The top floor of Jockey's Fields would be shared between office accommodation and a studio flat. This awkward office, disconnected from the rest of the office accommodation would be hard to let.

The proposed terraced amenity space for the office which has been identified by the market as important to securing a new tenant would be compromised. There would be a poor relationship between it and residential windows which would be very close, and the proximity of the two uses would raise security concerns. These matters would all impact on the attractiveness of the scheme and the ability to let the office, and indeed sell the flat.

The poor quality of the market studio

The studio on the third floor would not be of good quality. It would be an awkward shape. The internal daylight that it would receive would be constrained because it would have a single, rear aspect. It would have no amenity space. The proximity of the plant within the new closet wings, which would only be 9 metres away, would have an acoustic and air quality impact.

At ground floor it would not be possible to deliver level access, as there is currently, and would continue to be, a step up of circa 700mm from pavement level with no ability to provide a ramp or platform lift outside without extending beyond the ownership boundary and blocking the pavement. Disproportionate structural works would be required to allow level threshold access for waste collection.

These features are all deficiencies against the Council's general principles for new homes in its Housing CPG.

Negative impact on the scheme's sustainability credentials

There would be greater embodied carbon through the additional structural works and partitioning than within the application scheme, in addition to that associated with the sprinkler tank and second core.

As well as impacting on the attractiveness of the office space to the market, the additional complexity would be detrimental to overall BREEAM assessment, where improvement to the building's sustainability credentials is critical to securing a new occupation. There would be a negative impact on internal daylight levels within the office space (particularly at first and second floor levels). This would have a detrimental effect on occupant health and wellbeing. Additional roof-mounted plant requirements (to serve the residential unit) would reduce space available for biodiverse green roofs and renewable technology installations. There would also be potentially serious acoustic issues to overcome with the design of the separating walls and floors between the residential and commercial areas, together with increased water and energy consumption.

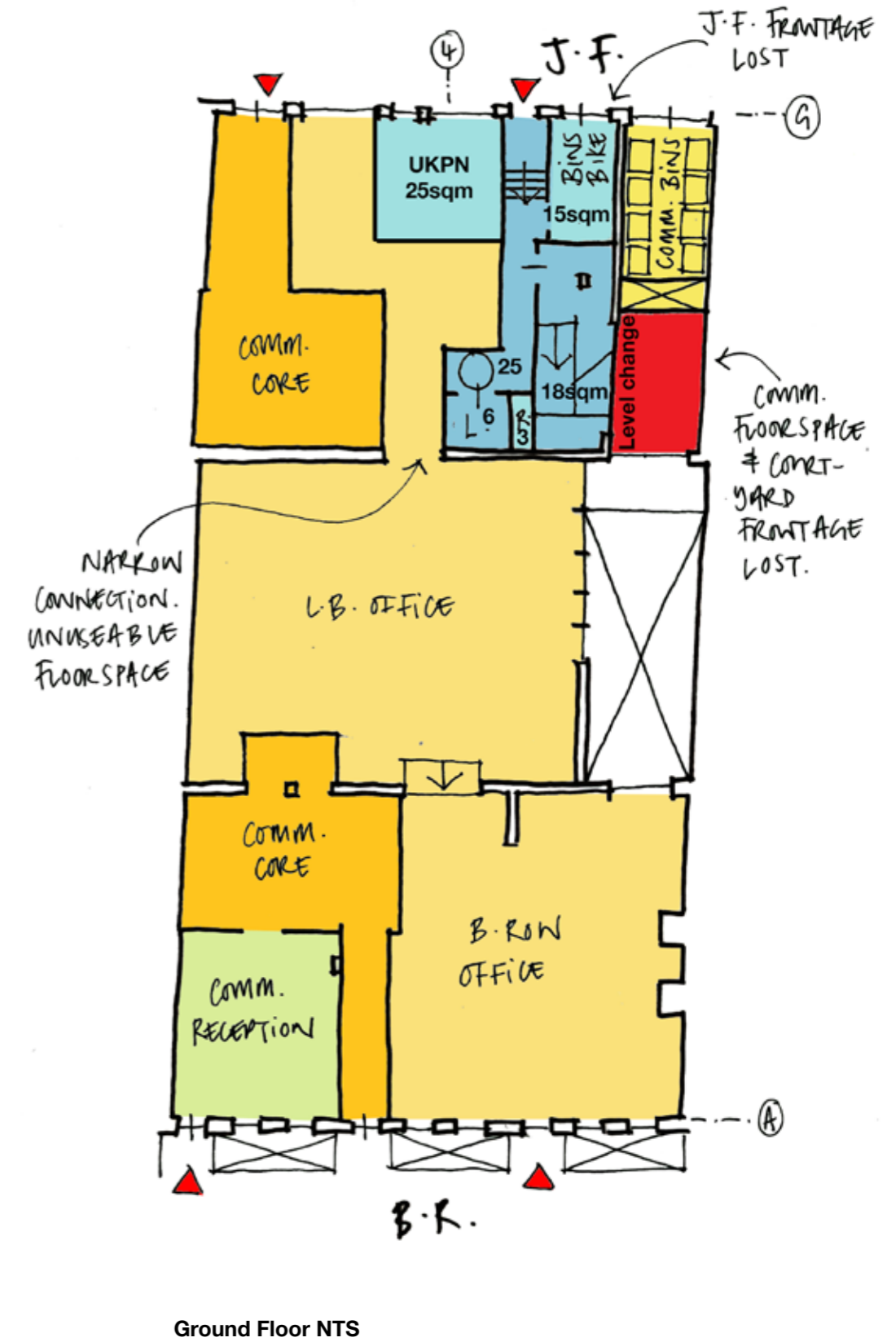
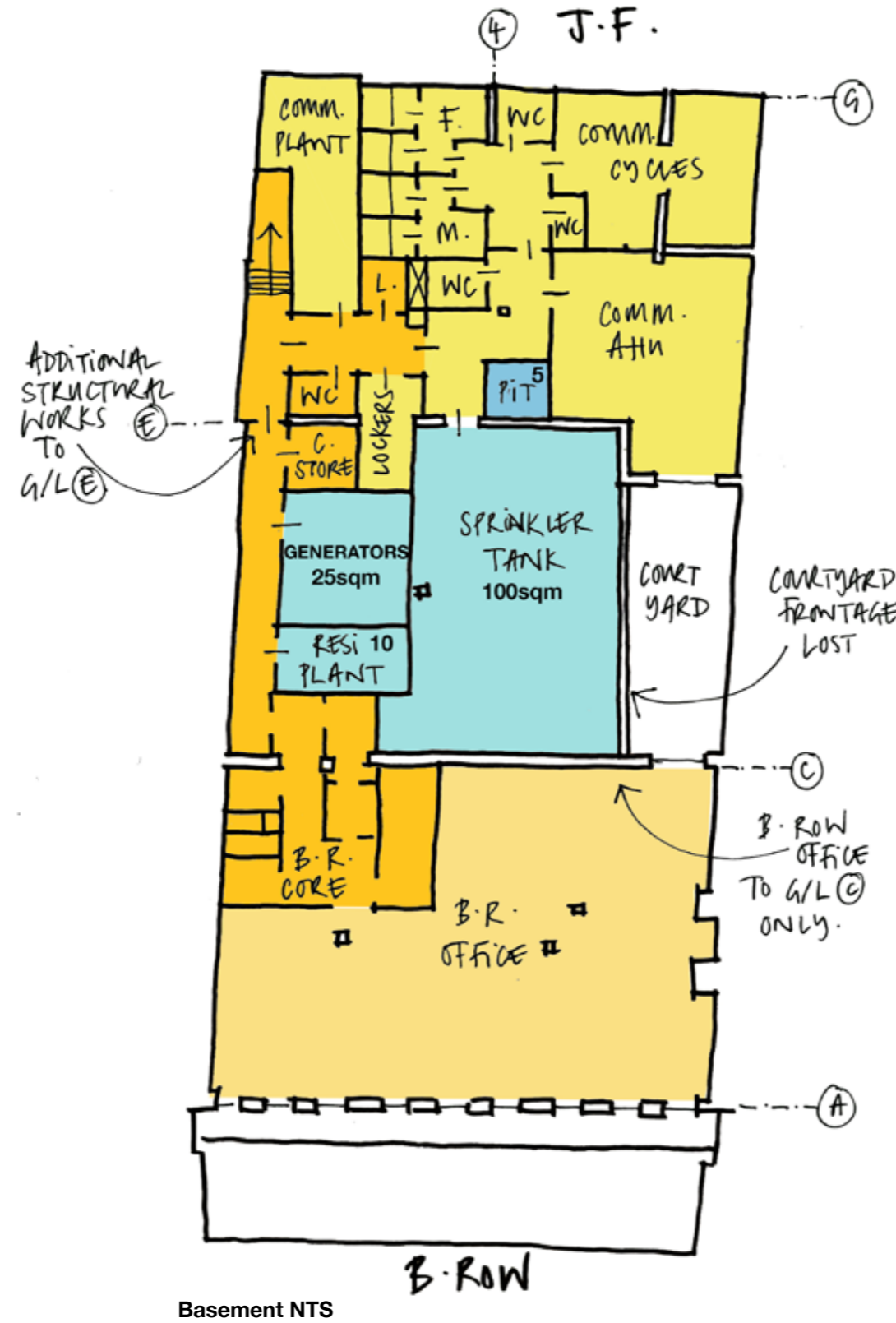
2.5 OPTIONS: RESIDENTIAL AT FIRST FLOOR LEVEL

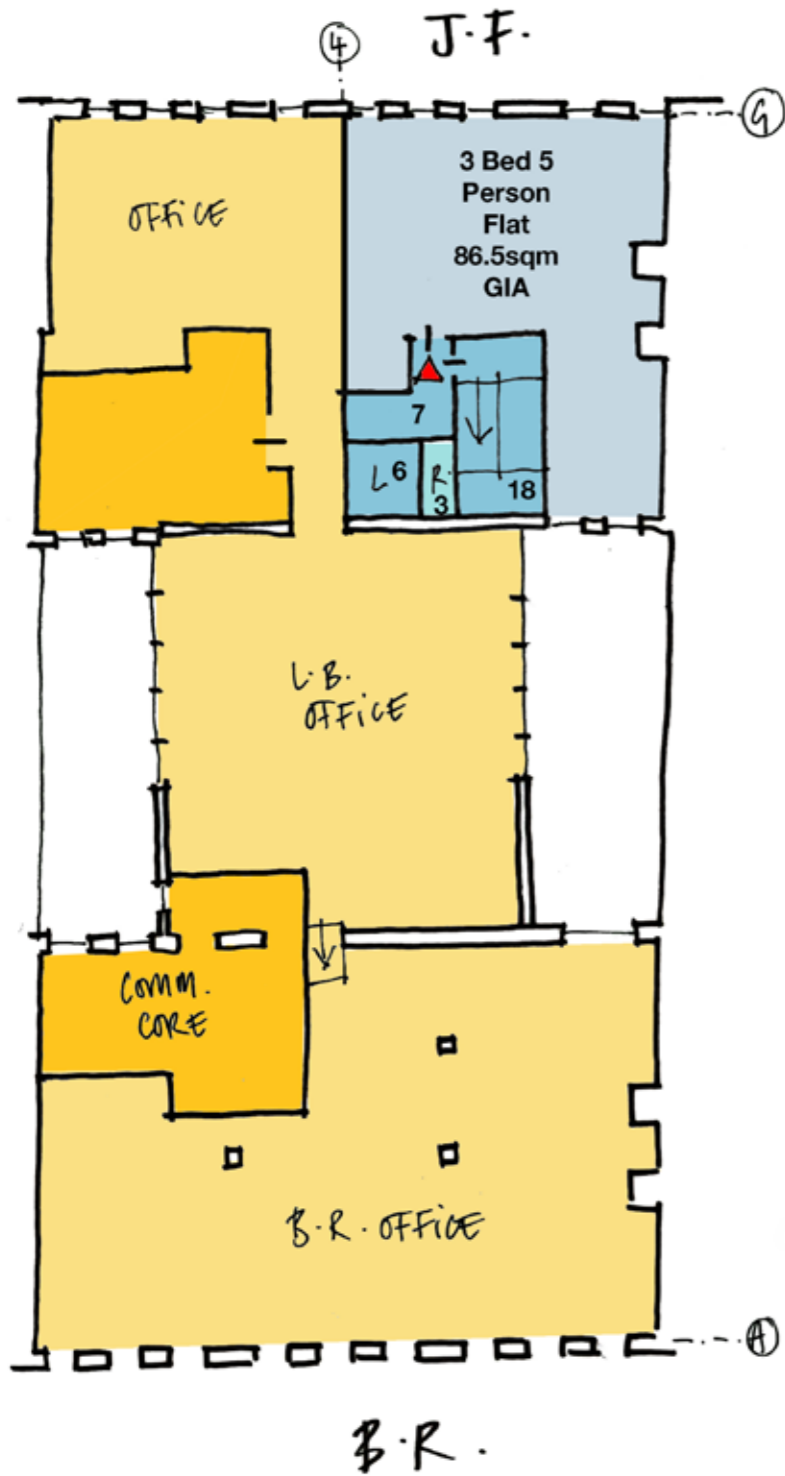
Approach

This second option looks at placing residential unit(s) at first floor level of the Jockey's Fields block.

After access, plant and servicing are provided to facilitate the residential use, there is 86.5sqm of residential GIA which can theoretically accommodate a single 3 bed 5 person unit at min. 86sqm GIA. Basement and ground layouts remain unchanged.

- B1 Reception
- B1 Core
- B1 Plant & Servicing
- B1 Office Space
- C3 Plant & Servicing
- C3 Core
- C3 Residential Accommodation
- Inaccessible B1 Floorspace





First Floor NTS



Jockey's Fields Elevation NTS

Areas

Residential GIA by floor:

Basement	140sqm
Ground	92sqm
First	34sqm core + 86.5sqm flat
Total	352.5sqm

Residential GIA by function:

Plant & Servicing	192sqm
Core & Circulation	74sqm
Accommodation	86.5sqm
Total	352.5sqm

Inefficiency and wastefulness

Efficiency would not be meaningfully increased through providing the residential accommodation at first floor level rather than at third floor. 1,186sqm of the total 3,390sqm would still be core or plant, equating to an overall efficiency of 65%. This would still be significantly below the 73% of the application scheme, and that achieved through recent refurbishments and extensions elsewhere on Bedford Row.

The total useable office accommodation would be 2,204sqm, or 2,240sqm including the reception, which would still be below the existing amount of useable office accommodation in the building of 2,287sqm NIA. There would still therefore, be no contribution to the Council's policy aim to increase offices and therefore jobs within the Central Activities Zone.

Only a single residential unit of 86.5sqm would be created from the 352.5sqm policy target due to the various technical requirements. Therefore, only 25% would be useable. This is still extremely inefficient and wasteful.

Negative impact on the quality and layout of the office accommodation

There would be the same negative impacts on the basement and ground floor office layouts as described for the previous option. The basement would be largely consumed by plant allowing no improvement to residual basement office accommodation. The ground floor layout would be significantly compromised by the technical requirements and there would be some completely inaccessible space.

The reduced office accommodation at first floor would have an awkward layout and be disconnected from the rest of the offices, with the core blocking critical natural light into the space because of its low floor to ceiling height. This space would be hard to let.

The poor quality of the market flat

A 3- bedroom unit is shown at first floor level, which would be engulfed by office accommodation above, below and to its side. The bin stores and sub-station directly below the proposed unit, the close relationships with the office accommodation generally and between the rear windows and from the office terrace above would create potential conflicts over privacy, security, noise, and disturbance. The flat would have no amenity space despite being of family size and no level access.

At ground floor it would not be possible to deliver level access, as there is currently, and would continue to be, a step up of circa 700mm from pavement level with no ability to provide a ramp or platform lift outside without extending beyond the ownership boundary and blocking the pavement. Disproportionate structural works would be required to allow level threshold access for waste collection. These features are all deficiencies against the Council's general principles for new homes in its Housing CPG.

Negative impact on the scheme's sustainability credentials

There would be greater embodied carbon within this option than the application scheme because of the additional structural and partitioning works, as well as through the sprinkler tank and second core. The complexity of the internal configuration would be detrimental to the BREEAM Assessment. Extra roof-mounted plant requirements (to serve the residential unit) would reduce space available for biodiverse green roofs and renewable technology installations. There would also be potentially serious acoustic issues to overcome with the design of the separating walls and floors between the residential and commercial areas, together with increased water and energy consumption.

2.6 OPTIONS: RESIDENTIAL AT GROUND LEVEL

Approach

This final options tests residential flats positioned at ground floor. After servicing, there is a 159.5sqm GIA residential requirement, which in theory could accommodate a 2 bed 4 person flat at 70sqm and a 3 bed 5 person flat at 89.5sqm. Basement layout effectively remains unchanged.









Areas

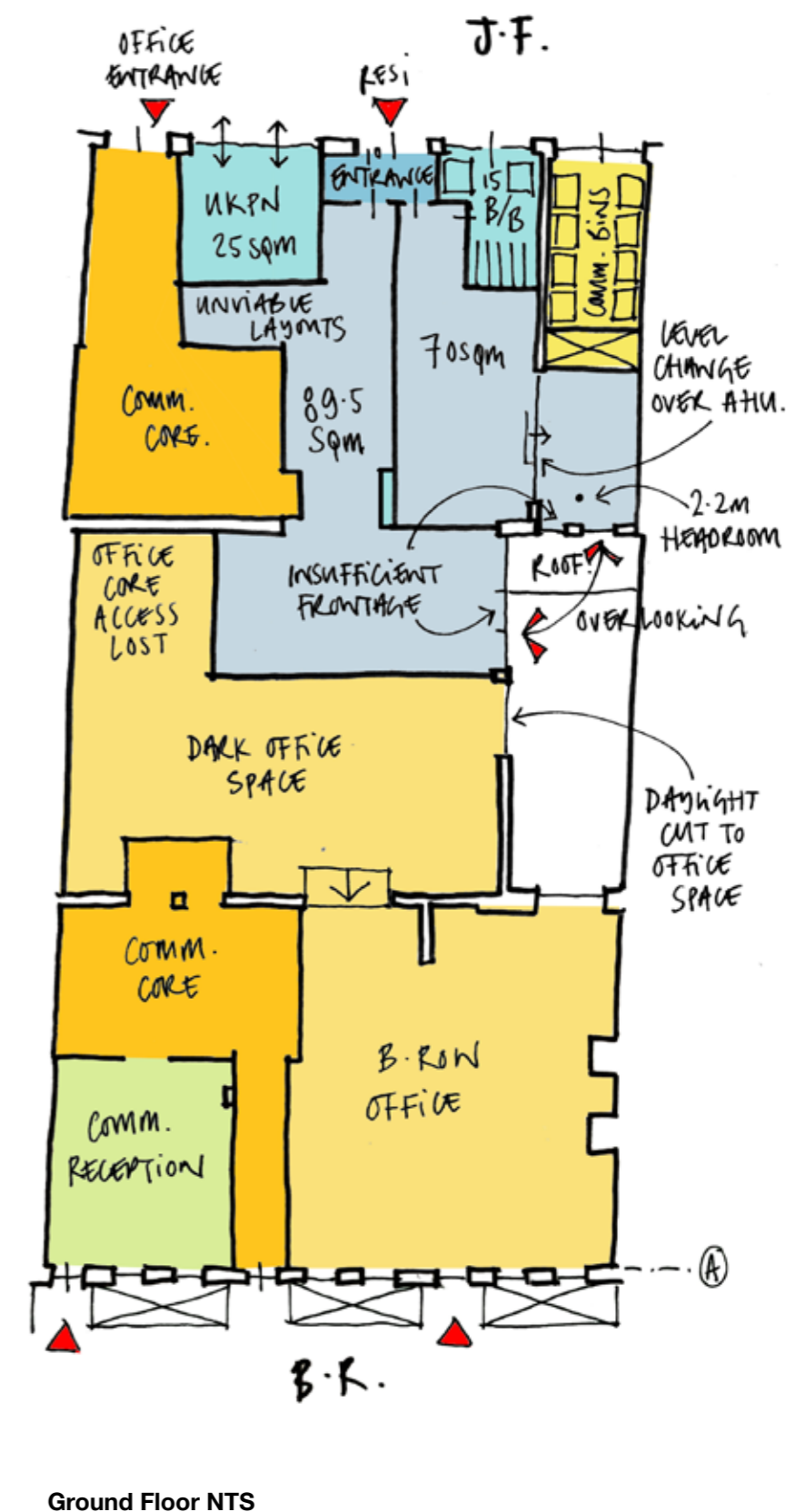
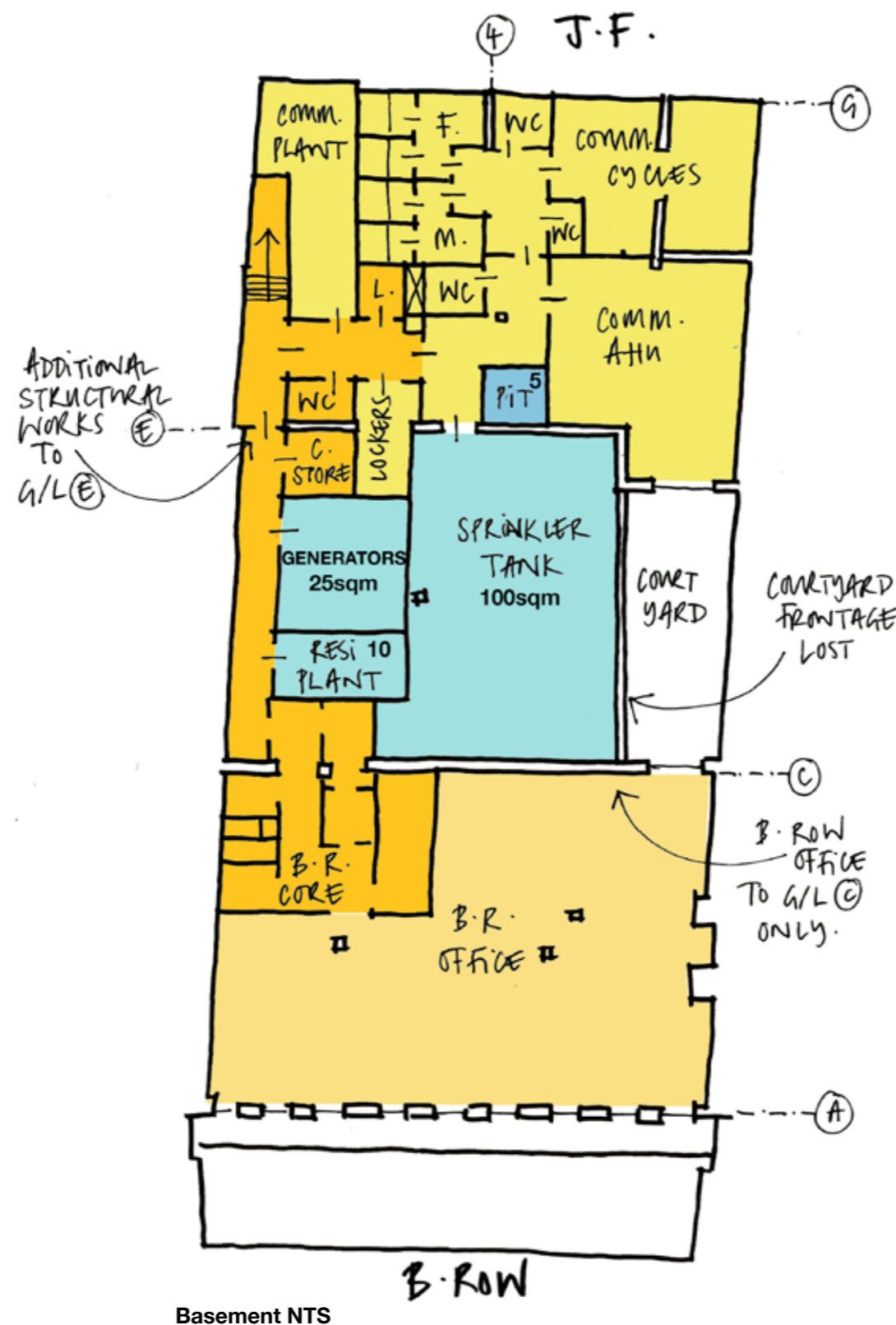
Residential GIA by floor:

Basement	140sqm
Ground	53sqm + 159.5sqm flats
Total	352.5sqm

Residential GIA by function:

Plant & Servicing	183sqm
Core & Circulation	10sqm
Accommodation	159.5sqm
Total	352.5sqm

	B1 Reception
	B1 Core
	B1 Plant & Servicing
	B1 Office Space
	C3 Plant & Servicing
	C3 Core
	C3 Residential Accommodation
	Inaccessible B1 Floorspace



Inefficiency and wastefulness

Efficiency would only be increased to 67% through providing residential accommodation at ground floor level. 1,113sqm of the 3,390sqm would be core or plant. The quantum of useable office accommodation would be 2,277sqm, or 2,313sqm including the reception, which would not be a meaningful increase above the existing. 2 residential units would be created over 159.5sqm, which would be 45% (less than half) of the policy target and only 0.2% of the Council's annual housing target.

Negative impact on the quality and layout of the office accommodation

There would be the same negative impact on the provision of office at basement level as the previous options. No usable office accommodation would be provided at ground floor within the Jockey's Fields element of the scheme as it would be consumed by the substation, office core, bicycle and refuse stores and the residential accommodation. The office floorspace to the centre of the building at ground floor would be dark with a low floor to ceiling height. In practice, very little of the ground floor across the entire building would be useable as office.

The poor quality of the market flats

The 2 flats would be of unfeasible low quality. They would have an awkward layout, no frontage to Jockey's Fields and a single rear aspect. They would, therefore, receive low levels of daylight and sunlight and have poor outlook, as well as been surrounded by office use, plant and the building's bicycle and refuse storage to the further detriment of residential amenity.

Negative impact on the scheme's sustainability credentials

There would be greater embodied carbon within this option than the application scheme because of the additional structural and partitioning works, as well as through the sprinkler tank and second core. and the complexity of the internal configuration would be detrimental to the BREEAM Assessment.

There would be a negative impact on internal daylight levels within the office space at ground floor, with some areas receiving minimal natural light. This would have a detrimental effect on occupant health and wellbeing and increase energy use associated with artificial lighting. Additional roof-mounted plant requirements (to serve the residential unit) would reduce space available for biodiverse green roofs and renewable technology installations.

The proposed residential units would receive minimal natural light and would be unable to meet BREEAM Domestic Refurbishment requirements for daylight levels. There would be security issues with this design as well as potentially serious acoustic issues to overcome with the design of the separating walls and floors between the residential and commercial areas, together with increased water and energy consumption.

2.7 SUMMARY AND CONCLUSION OF THE ON- SITE ASSESSMENT

These options show that the integration of housing in any configuration on- site would be so fundamentally deficient against the policy criteria of H2, particularly H2(d), (h) and (j), that it would clearly be an impractical approach.

H2(a) refers to the character of the development, the site, and the area:

The building has been subject to a prolonged period of vacancy. The purpose and character of the development against which the integration of housing should be considered, is to make the building more attractive and suitable for office occupiers and to overcome deficiencies which include its poor configuration, state of repair and lack of amenity. Planning policies for listed buildings and for the Central Activities Zone which support and protect employment sites, collectively indicate that significant weight should be given securing the building's reuse for office purposes. The area is predominantly commercial and furthermore, the site's immediately adjoining neighbours are office.

H2(b) refers to the site size, and constraints on developing the site for a mix of uses:

The site is small and part of a terrace. There are numerous challenges to the introduction of housing because of the tight relationships both within the site, and with its neighbours. The attractiveness, security, and usability of the office accommodation on- site and indeed next door, would be compromised through the very close proximity of housing. Future residents would be subject to issues of noise, disturbance, and lack of privacy which are referred to in this report.

H2(c) refers to the priority the Local Plan gives to the jewellery sector in the Hatton Garden area:

The site is not located in the Hatton Garden area, and this is therefore not relevant to the proposed development.

H2(d) refers to whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use:

The fundamental purpose of the development is to secure the future of the grade II listed building, as an office. The introduction of housing would add complexity, significantly compromise the quality and usability of the office floorspace, be greater in embodied carbon and perform worse through BREEAM assessment. It would be contrary to the overarching objective to bring the building back in to use and direct occupier feedback that the existing office floorspace is currently poor quality, sub-divided and lacking in its sustainability credentials. There would be little improvement to the non-residential use which is the purpose of this application.

H2(e) refers to whether the development is publicly funded or serves a public purpose:

The proposed development will be privately funded. The application scheme will secure the future of the listed building which is a public purpose and will deliver high quality office floorspace which will contribute to the local economy, and which would otherwise be diluted by the introduction of market housing.

H2(f) refers to the need to add to community safety by providing an active street frontage and natural surveillance:

The location of the site is not within an area identified by Metropolitan Police data as a crime hotspot and is therefore not a significant issue. Also, the introduction of residential at lower levels of the building will be a less active use than the proposed office and will have a negative impact on the activity of Jockey's Fields

H2(g) refers to the extent of any additional floorspace needed for an existing user:

There is no existing user, however, there would be a reduction in the gross and net office areas and in quality through the introduction of housing to the detriment of securing future occupier/s, the aim of bringing the building back into use as an office and to the Council's policy aims to increase offices and jobs in the Central Activities Zone.

H2(h) refers to the impact of a mix of uses on the efficiency and overall quantum of development:

The inclusion of housing into the scheme would be extremely inefficient and wasteful of space. The overall scheme efficiency would range from only 63% to 67% depending on the location of the residential, in comparison with 73% for the application scheme and similar efficiency achieved in other recent refurbishments and extensions in Bedford Row. This is due particularly to the additional technical requirements to deliver a mixed-use scheme. There would be no meaningful uplift in office accommodation and therefore, no contribution towards the Council's policy aim to increase offices and jobs within the Central Activities Zone. The amount of usable housing that would be created would be de-minimis in the context of the Council's annual housing target and the number of units would be well below the 4 that the Camden CPG expects to be delivered by the target floorspace as a further indication of the level of inefficiency.

H2(i) refers to the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing:

There would be extra costs associated with integrating residential space, due to the extra complexity in design at a time when there is significant cost inflation generally, together with a reduction in the net lettable office area and in its quality, as highlighted in this study, which would

impact on scheme viability.

H2(j) refers to whether an alternative approach could better meet the objectives of the mixed-use policy and the Local Plan:

Given the impact that on- site residential provision would have on the amount, quality and layout of the office space, overall scheme efficiency, the de-minimis quantum and poor standard of market flats that would be delivered, its negative impact on the scheme's sustainability credentials and the potential issues of noise, disturbance, and lack of privacy that future residents would be subject to, the on- site provision of residential accommodation is not the optimal solution in this case and there is a more appropriate approach.

3.0 ALTERNATIVE DELIVERY SITES

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Camden's Housing CPG states that where it is not practical for development to deliver on- site housing, the Council will seek to agree off- site delivery on a site in the applicant's control. The applicant does not own any other available properties in the Borough and the Council has recently accepted (through decision ref. 2022/1817/P in relation to 105-121 Judd Street) that this reason renders the delivery of off- site housing unfeasible.

In accordance with the Housing CPG consideration was given to the potential acquisition of a property being marketed having regard to the locational requirements specified by the CPG and Officers, which comprised the area of the Borough south of Euston Road, and the policy targets. These are for commercial space of 352.5sqm available on freehold or long leasehold terms with immediate vacant possession, as necessary to deliver permanent residential, and which is suitable for a linked change of use to residential. Consideration was also given flexibly, in accordance with the CPG, to commercial properties below this floorspace level and for which extension, as well as change of use, would be feasible.

Daniel Watney LLP's Agency Team reviewed the market on this basis in the lead up to the submission of this application using CoStar, Zoopla and Novaloca as three separate sources of information and through speaking to other agents, however no available buildings were found. The results which are scheduled below, are consistent with acknowledgement in Camden's Housing CPG of the difficulty in finding additional sites to provide off-site housing. It states that in recent years the opportunities to acquire potential delivery sites at relatively low costs have diminished.

Address	Postcode	Long Lease/ Freehold	Area (sqm)	Sale Price (£)	Agent comments on 21 st September 2022
34 Bloomsbury Way	WC1A 2SA	Freehold	339	2,750,000	Several offers have been received for the property which the vendor is pursuing.
32 Bedford Row	WC1R 4HE	LLH 133 years remaining	266	2,500,000	Conversion to residential is prohibited in the lease being sold.
44 Bedford Row	WC1R 4LL	LLH 992 years remaining	258, ground floor suite, unit 1, only	2,000,000	This property is under offer and is no longer available. Conversion to residential is also prohibited in the lease being sold.
43-49 Parker Street	WC2B 5PS	Freehold	89-509	5,000,000	The property is under offer and is therefore unavailable.
28-30 Theobalds Road	WC1X 8NX		292, ground floor and lower ground floor only		The property is no longer available as it is under offer.
43 Leather Lane	EC1N 7UY	Freehold	301	1,300,000	This site was recently sold and is no longer available.

Policy H2 states that where on- site and off- site options have been explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, the Council may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by planning obligation. For non-residential schemes, a rate of £1,500sqm GIA will generally be applied to shortfalls in the provision of market housing. It is considered that this is the most appropriate approach in this case and that a valuable contribution will be made, capable of being directed by Camden to its priorities, such as its investment programme in affordable units.