

# PLANNING COMMITTEE REPORT

Development Management Service  
Planning and Development Division  
Environment and Regeneration Department  
Town Hall  
Upper Street  
LONDON N1 1YA

<b>PLANNING COMMITTEE</b>		<b>AGENDA ITEM NO: B5</b>
<b>Date:</b>	9 <sup>th</sup> October 2017	

Application number	P2016/4807/FUL
Application type	Full Planning Application
Ward	Bunhill
Listed building	n/a
Conservation area	St Luke's Conservation Area
Development Plan Context	Bunhill and Clerkenwell key area Central Activities Zone Employment Priority Area (General) Primary employment location Archaeological Priority Area
Licensing Implications	n/a
Site Address	Sycamore House, 5 Sycamore Street, London, EC1Y 0SR
Proposal	Demolition of existing B1 office building and erection of a replacement 7-storey (plus basement) B1 office building comprising 2,337sqm (GIA) / 1,776sqm (NIA) of office floorspace.

Case Officer	Victor Grayson
Applicant	Ndemi Investments Ltd
Agent	Planning Sense

## 1 RECOMMENDATION

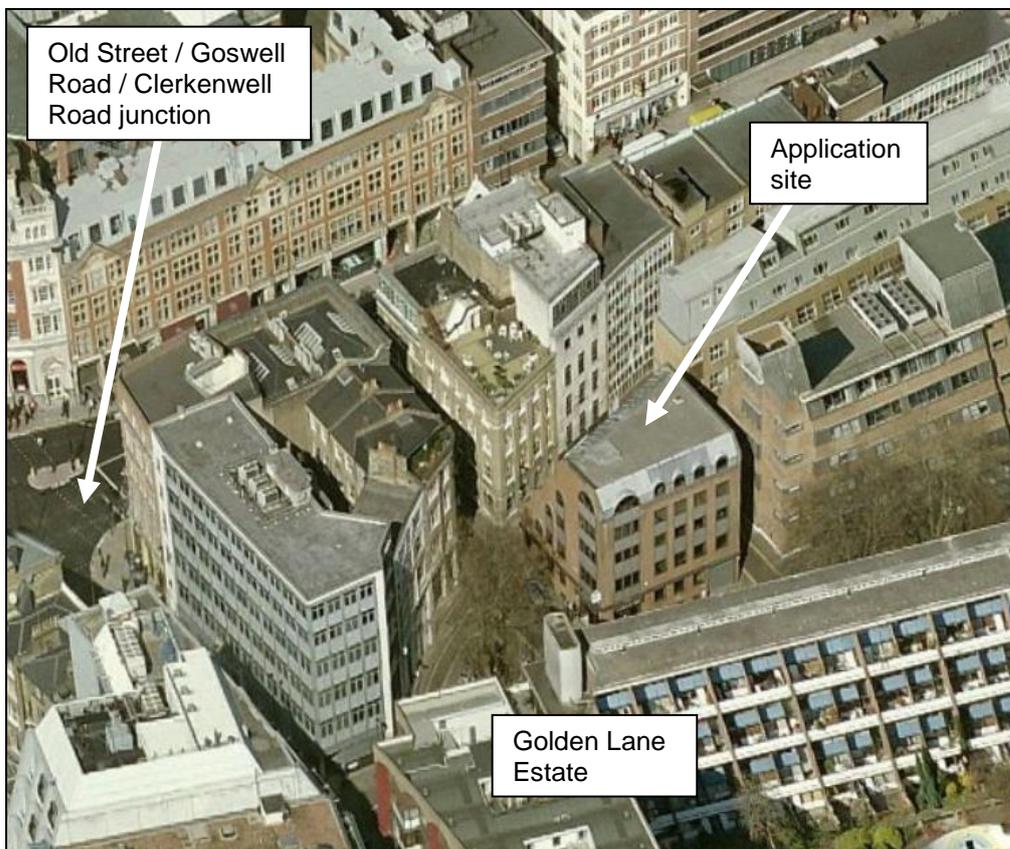
The Committee is asked to resolve to **GRANT** planning permission:

1. subject to the conditions set out in Appendix 1; and
2. conditional upon the prior completion of a Deed of Planning Obligation made under section 106 of the Town and Country Planning Act 1990 securing the heads of terms as set out in Appendix 1 (Recommendation A).

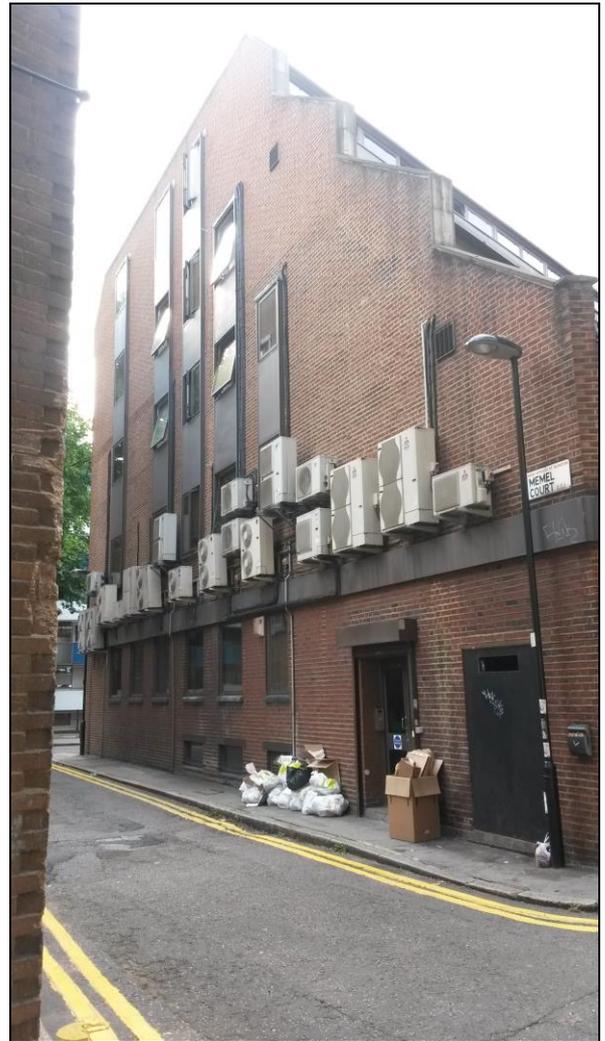
**2 SITE PLAN (SITE OUTLINED IN RED)**



**3 PHOTOS OF SITE/STREET**



Photograph 1: aerial view of site and surroundings from the south



Photographs 2, 3 and 4: existing building

## **4 SUMMARY**

- 4.1 The application site is 0.0325 hectares in size and is currently occupied by a five-storey (plus basement) office building. The site is within the Central Activities Zone, an Employment Priority Area (General), the St Luke's Conservation Area, and an Archaeological Priority Area, and is adjacent to the Hat and Feathers Conservation Area.
- 4.2 The applicant proposes the demolition of the site's existing building, and the erection of a replacement seven-storey (plus basement) B1 office building comprising 2,337sqm (GIA) / 1,776sqm (NIA) of office floorspace. Excavation is proposed to accommodate the enlarged basement.
- 4.3 The redevelopment of the site is considered acceptable in principle, and the application has been considered with regard to the National Planning Policy Framework (NPPF) and its presumption in favour of sustainable development. Officers agree that demolition and redevelopment would be preferable to the retention and refurbishment of the existing building.
- 4.4 The proposal is considered largely acceptable in terms of land use, inclusive design, transportation and servicing, archaeology, sustainability and energy, subject to conditions and an appropriate Section 106 agreement.
- 4.5 Objections have been received from neighbouring residents on amenity and other grounds. Adverse impacts upon natural light have been identified in the applicant's daylight and sunlight assessment, and windows and massing would come closer to neighbouring windows when compared with the existing building. However, the most affected buildings are not in residential use, setbacks are proposed from fourth floor upwards, and a rooftop plant enclosure has been deleted from the proposals during the life of the application. It is considered that the proposals strike the right balance between making full use of this accessible site and respecting neighbour amenity. Although some adverse impacts would occur in relation to natural light, privacy and outlook, the weight to be given to these impacts is limited, and refusal of permission on these grounds is not recommended.
- 4.6 Noting the statutory duty placed on the council by the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character and appearance of the St Luke's and Hat and Feathers Conservation Areas when determining this application, the proposed development is considered acceptable in terms of its design and impact upon heritage assets. At best, the existing building currently makes a neutral contribution to the conservation area, and its demolition is considered acceptable given that a building of a suitably high quality design would replace it. The comments and concerns of Islington's Design Review Panel have been adequately addressed.
- 4.7 Appropriate Section 106 Heads of Terms have been agreed with the applicant.
- 4.8 The benefits of the proposed development (including the re-use of an underused site, the replacement of an unattractive building and its incongruous stepped and sloped massing, the replacement of the existing floorspace with office floorspace of a better

quality, the provision of floorspace suitable for occupation by micro or small enterprises, the formalisation of refuse and cycle storage, and surface water run-off improvements) are noted and have been considered in the final balance of planning considerations, along with the shortcomings of the proposed development (the abovementioned neighbour amenity impacts). On balance, it is recommended that permission be granted.

## **5 SITE AND SURROUNDINGS**

- 5.1 The site is 0.0325 hectares in size, is trapezium-shaped, and is currently occupied by a single building that provides 1,657sqm (GIA) / 1,329sqm (NIA) of office floorspace. The site stands opposite the borough boundary shared with the City of London, and is bounded by Sycamore Street, Crescent Row, Memel Court and Baltic Street West. The existing building dates from 1936, a major extension and refurbishment was carried out in or after 1988, and further alterations were made in or after 1991. The existing building rises to five storeys (plus basement) on its southeast elevation, from two storeys (plus basement) in stepped and sloped massing on its northwest side. Elevations are of brick.
- 5.2 The site is within the St Luke's Conservation Area. The Hat and Feathers Conservation Area covers land and buildings immediately to the north and west. To the south, in the City of London, is the Golden Lane Estate, within which Hatfield House is Grade II listed, and Crescent House is Grade II\* listed. To the north, 12 Old Street is Grade II listed. The site is in the Moorfields Archaeological Priority Area.
- 5.3 Surrounding buildings are in commercial (mostly office) use, however Hatfield House and the upper floors of other buildings (including 5 Crescent Row) are in residential use.
- 5.4 Double yellow lines surround the site, however there are restricted parking spaces on Sycamore Street and Baltic Street West. The site is within a Controlled Parking Zone. The site has a PTAL score of 6a/6b. The existing building is currently serviced from the street.
- 5.5 The application site has no trees or significant areas of soft landscaping. A tree, surrounded by motorcycle parking spaces, exists to the southwest of the site, and there are trees within the grounds of the Golden Lane Estate.
- 5.6 The site is located within the Central Activities Zone (CAZ) and an Employment Priority Area (General).

## **6 PROPOSAL (IN DETAIL)**

- 6.1 The applicant proposes the demolition of the site's existing building, and the erection of a replacement seven-storey (plus basement) B1 office building comprising 2,337sqm (GIA) / 1,776sqm (NIA) of office floorspace. Internal partitions at basement and ground floor would separate a total of 120sqm (GIA) / 95sqm (NIA) of the office floorspace to provide two units (on separate floors, albeit both accessed from the same external

entrance on Crescent Row and connected internally by a staircase, platform lift and void) that would be suitable for occupation by micro or small enterprises by virtue of their size. The basement would also accommodate plant rooms, toilets and shower and changing facilities. At ground floor level, a refuse store, electricity substation and cycle store are proposed.

- 6.2 Excavation is proposed to accommodate the enlarged basement.
- 6.3 The proposed building would cover the entire site at ground to fourth floor level. A series of setbacks behind the Crescent Row and Sycamore Street elevations are proposed at fourth, fifth and sixth floor levels. Roof terraces are proposed to the Sycamore Street elevation at fifth and sixth floor level.
- 6.4 Elevations would be of brick at ground to fourth floor. The fifth and sixth floors would be clad with bronze-coloured shingles. Windows and doors would be framed with aluminium in a “dark umber” anodised finish.
- 6.5 No on-site car parking is proposed. Space for the parking of a total of 30 cycles, and one accessible cycle space, is proposed.

### **Revision 1**

- 6.6 The amended drawings received on 03/05/2017, 09/05/2017, 15/08/2017 and 08/09/2017 illustrated the following changes to the proposals:
- Space at basement (70sqm GIA) and ground floor (50sqm GIA) partitioned to provide space suitable for small and medium-sized enterprises (SMEs).
  - Separate staircase and platform lift added between basement and ground floors.
  - Enlargement of internal voids to provide natural light to basement.
  - Metal railings to roof terraces at fifth and sixth floor levels replaced with glass balustrades.
  - Redesign of elevations (deletion of previously-proposed brick horizontal elements, and enlargement of ground floor windows)
  - Addition of column of windows to Baltic Street West elevation, to expose workings of the passenger lift.
  - Amendments to brick bond – Flemish bond now proposed, and stack bond detail deleted.
  - Deletion of signage.
  - Deletion of rooftop plant enclosure.
- 6.7 An updated schedule of accommodation (dated 03/08/2017) was submitted on 10/08/2017.
- 6.8 On 09/08/2017 a document titled “Addendum to Daylight and Sunlight Report” (MES, dated 27/03/2017) was submitted. This was not put to full consultation as officers noted errors and omissions in it, and certain neighbouring residents who had been asked to check parts of the document confirmed other errors. A further addendum report (rev A, dated 15/08/2017) was submitted, and a further Daylight and Sunlight Report (rev B, dated 14/09/2017) was submitted on 14/09/2017.

6.9 Neighbouring occupants were consulted on these amendments and information on 15/09/2017.

## **7 RELEVANT HISTORY**

### **Planning Applications**

- 7.1 18/12/2013 – Permission granted for replacement of existing doors to office building with new glazed doors (ref: P2013/4162/FUL).
- 7.2 15/11/2013 – Permission granted for creation of bin store within existing store area and installation of new external door (ref: P2013/3077/FUL).
- 7.3 17/07/2013 – Permission granted for replacement of entrance doors to office building with glazed doors (ref: P2013/1687/FUL).
- 7.4 04/08/1998 – Retrospective permission refused for change of use of the ground floor from B1 offices to B8 storage or distribution with 24-hour operation (ref: 981151).
- 7.5 09/01/1990 – Permission granted for refurbishment including new 30sqm WC block to the rear (ref: 891257).
- 7.6 07/12/1988 – Permission granted for refurbishment of premises and change of use from warehouse to B1 (ref: 881443).
- 7.7 07/12/1988 – Permission granted for refurbishment of premises, erection of a third and fourth floor extension and change of use to B1 (ref: 881283).

### **Enforcement**

7.8 No relevant history.

### **Pre-application Advice**

7.9 The council issued a pre-application advice letter on 14/04/2016 in relation to a proposal for the demolition of the existing building, and the construction of a part five-part six- and part seven-storey building comprising 2,351sqm (GIA) of B1(a) office floorspace. The main points included in the letter of 14/04/2016 were:

- Planning policies generally encourage and support office development at this site. Proposed increase in office floorspace welcomed.
- Policies require provision of floorspace suitable for small and medium-sized enterprises, and/or affordable workspace.
- All new business floorspace must be designed to allow for future flexibility for a range of uses, including future subdivision and/or amalgamation.
- Policies require a balanced mix of uses within the Central Activities Zone (CAZ), including retail and leisure uses at ground floor level where appropriate, and residential if there would be an uplift in office floorspace. If it

can be demonstrated and justified that on-site housing provision is not possible, a financial contribution would be required.

- Demolition of the existing building is acceptable in principle. Existing building reflects the heights of surrounding buildings, but is of little architectural merit.
- Proposed bulk and massing would be broadly comparable to neighbouring developments, albeit with some increase at roof level.
- Proposed top (sixth) floor, although setback, may appear incongruous in the local roofscape and may not be acceptable. Suitably setback fifth floor acceptable in principle, if designed to minimise impacts.
- Proposed elevational treatment considered appropriate. Rounded corner treatment welcomed. Further detailed advice provided regarding elevations.
- Cladding of top two storeys in a high quality copper or brass is acceptable in principle.
- Detailed daylight and sunlight assessment required, including Vertical Sky Component and Daylight Distribution testing. Room uses would need to be clarified rather than assumed.
- Applicant will need to demonstrate development would not have an unacceptable adverse impact on neighbouring amenity in relation to loss of light, overshadowing, loss of outlook, increase sense of enclosure, loss of privacy due to overlooking, or increased noise and disturbance due to servicing or operation of plant.
- Development should adopt a best practice approach in relation to inclusive design. Refer to Inclusive Design in Islington SPD. Access Statement required. Evacuation lift preferred.
- Details of delivery and servicing arrangements required. There is potential for on-street servicing to conflict with wider strategic proposals in the Old Street area, including the proposed Central London Cycle Grid Network that includes Old Street.
- Transport Assessment and full Travel Plan required. TA should assess existing and proposed vehicular and pedestrian movements from the site, and should suggest measures to address any issues.
- Cycle parking (1 per 80sqm of office floorspace) required to be secure, sheltered, integrated, conveniently locate, adequately lit and step-free. Accessible cycle storage required.
- Car-free nature of proposal welcomed.
- Accessible parking required.
- Details of refuse and recycling facilities required.
- Planning policies regarding energy and sustainability applicable.
- Drainage information required.
- Site is within the Mayor of London's Crossrail charging area.
- Section 106 Heads of Terms would include highways repair/reinstatement, employment and training, mixed use (in CAZ) affordable housing contribution if accepted that housing cannot be provided on site, financial contribution in lieu of on-site provision of affordable workspace (if applicable), compliance with relevant codes (the Code of Employment and Training, Code of Local Procurement, and Code of Construction Practice), CoCP monitoring fee, work placements, accessible parking bays, carbon offsetting, connection to a district energy network, Green Performance Plan, Travel Plan and council's legal fees. All payments to be index-linked.

## 8 CONSULTATION

### Public Consultation

- 8.1 Letters were sent to occupants of 190 adjoining and nearby properties on Baltic Street East, Baltic Street West, Charterhouse Buildings, Crescent Row, Domingo Street, Golden Lane, Goswell Road, Memel Street, Old Street and Sycamore Street on 21/12/2016. A site notice and press advertisement were displayed on 29/12/2016.
- 8.2 Following the receipt of further information and amended plans (Revision 1) all neighbouring properties were reconsulted on 15/09/2017. The public consultation period expired on 02/10/2017, however it is the council's practice to continue to consider representations made up until the date of a decision.
- 8.3 Objections to the proposed development from (or representing) a total of nine unique addresses (and one unaddressed response) have been received from the public with regard to the application following the council's consultation.
- 8.4 The issues raised following the council's initial consultation can be summarised as follows (paragraph numbers refer to where the matter is addressed in this report):
- Adverse visual impact. Overbearing bulk and massing. Rooftop plant enclosure would increase the sense of scale and the building's bulk. Development would rise more than 2.5 storeys above Victorian buildings, and area's skyline would be impacted (**paragraphs 10.38-10.40 and 10.58**).
  - Limited architectural merit. Proposal would not improve on design of existing building. Banal, cheap developer architecture, design motivated by maximising floorspace. Design not relevant to context of Victorian warehouses which characterise the corner of Crescent Row and Sycamore Street. Development would not fit in with local character. New development should harmonise with character of the area. Proposed architectural treatment is too diagrammatic and requires more details (**paragraphs 10.44-10.47 and 10.59**).
  - Proposal contrary to Core Strategy policy CS9 (**paragraphs 10.22-10.66**).
  - Existing building is ugly, looks out of character and does not contribute positively to the conservation area. Its sloping roof and additional storeys are not appropriate in form or scale to the original structure and its setting (**paragraph 10.38**).
  - Proposal would not contribute positively to the conservation area or setting of the listed Golden Lane Estate. Conservation areas would be damaged. Bulk viewed from Hat and Feathers Conservation Area would almost be doubled. Proposal detracts from and reduces the historical significance of the area (**paragraphs 10.58-10.61**).
  - Site is within an archaeological priority area that covers a possible Roman road and associated roadside development (**paragraphs 10.68-10.69**).
  - Significant loss of daylight and sunlight. Losses are not insignificant and should not be disregarded. Applicant's report predicts substantial losses of daylight and sunlight to Hatfield House, Crescent Row and 12 Old Street. All 16 windows of Dynamis House would fail VSC testing. Overshadowing of properties on Crescent

Row, and roof terrace of 6-8 Sycamore Street. Dark work environment would be created, and there would be a negative impact on employees, affecting morale. Concerns regarding conclusions and methodology in applicant's assessment of daylight and sunlight. Applicant's report is misleading and inaccurate. Errors regarding room uses and window locations in applicant's assessment. Existing building's stepped northwest façade allows light to penetrate, however proposed building only steps back from fourth floor level. Council should commission an independent daylight and sunlight report from a specialist firm (**paragraphs 10.91-10.109**).

- No assessment regarding impacts on Rights to Light has been provided (**paragraph 10.110**).
- Loss of privacy from floor-to-ceiling windows looking directly into habitable rooms seven metres away, in breach of Islington's standards. Terraces on upper floors would look directly into bedrooms and living rooms. Existing building has a staircase at its west corner, providing privacy to 5 Crescent Row. Roof terrace at 6-8 Sycamore Street would be overlooked (**paragraphs 10.120-10.124**).
- Crescent Row would become a deep canyon and an oppressive environment to live and work in (**paragraphs 10.38, 10.66 and 10.106**).
- Crescent Row is already used by people to urinate, drink, deal drugs, fight and steal vehicles, and making the place more impersonal, darkened and alley-like would be detrimental to residents' wellbeing and safety (**paragraphs 10.66**).
- Loss of view from roof terrace at 6-8 Sycamore Street. Existing building's stepped northwest façade allows views from neighbouring buildings (**paragraph 10.111**).
- Refurbishment of existing building would have less, and shorter, impact (**paragraph 10.3**).
- Existing building has space available for rent (**paragraphs 10.8-10.9**).
- Noise impact on local area. More details of rooftop plant needed in relation to noise (**paragraphs 10.127-10.129**).
- Air pollution impact on local area (**paragraphs 10.196-10.197**).
- Extra traffic in local area, during construction and once completed. Crescent Row is a narrow street without a proper pavement, and residents' safety and access would be adversely affected. Available parking would be reduced (**paragraphs 10.174-10.175**).
- Additional rubbish would impact on local area. Development lack provision for refuse storage (**paragraphs 10.186**).
- Previous construction work caused disruption to residents of 10 Crescent Row, noisy work was carried out outside permitted hours despite complaints, and light pollution occurred at night. Proposal would also result in noise and light pollution during construction, and would extend previous disruption. Crescent Row is now a residential area, and constant building work does not recognise this. Residents in the local area should be compensated for inconvenience caused by works (**paragraphs 10.131 and 10.196**).
- Cumulative adverse impact of noise and vibration, dust pollution, waste and construction traffic. Submitted construction management plan has limited content and more detail is needed to establish how disruption will be minimised (**paragraphs 10.131, 10.180 and 10.196**).
- Adjacent property would be devalued (**paragraphs 10.218**).
- Applicant has not contacted residents to discuss proposals. Unusual for a large project on a significant site not to involve pre-application consultation. Consultation carried out over Christmas (**paragraphs 8.1-8.8**).

8.5 The issues raised following the council's reconsultation can be summarised as follows (paragraph numbers refer to where the matter is addressed in this report):

- Proposed building is two storeys too high (**paragraphs 10.38-10.40 and 10.58**).

8.6 Further comments will be reported verbally to the Planning Committee, should any be received.

### **Design Review Panel**

8.7 Islington's Design Review Panel (DRP) considered the proposals on 08/08/2017. The DRP provides expert impartial design advice following the 10 key principles of design review established by the Design Council CABI. The DRP's written observations of 29/08/2017 are attached at Appendix 3 of this report, and are summarised as follows:

- Welcome opportunities brought by the proposed scheme to improve upon the existing conditions.
- In many respects, the proposals have been successful in attempting to realise some of those opportunities, particularly in terms of the form of the building.
- No objection to proposed form, height and massing. The proposed form is generally more appropriate and responsive to the context than the existing building. It would replace the existing bizarre raked form, which does not contribute to the context and streetscape.
- Applicant has presented a convincing analysis of composition and context, and note reference to strong warehouse typology of the site's surroundings, but the proposed design did not actually deliver the design aspirations and the highlighted references.
- Applicant's conceptual explanation described the proposal as a solid load-bearing construction, whereas the proposal read more like a framed infill building.
- Concern that columns extended from ground floor to upper level without any horizontal break, with each level detailed in the same way, resulting in a building with an exaggerated vertical emphasis.
- Design lacks the sense of a robust brick construction with punched openings (as seen on warehouse-type buildings referred to by the applicant).
- Commended design of the staircase, but expressed concern that it was not expressed on the elevation, resulting in an excessive blank section of elevation with no animation or articulation.
- Although the applicant team intended to introduce a sense of hierarchy to the elevational composition, the elevation lacked a true sense of a strong base, middle and top. Ground floor looks squat and not in keeping with the scale and proportion of adjacent buildings or referenced precedents. Cornice level above ground floor should be revisited.
- Concern regarding quality of basement accommodation due to lack of windows.
- Queried what impact plant (deleted from roof level) would have on quality of basement and ground floor.
- No objection to principle of a stronger brick base and lighter metal top.

- Not convinced by proposed use of two different types of bricks around openings. Brick lacks a true sense of robustness due to the stretcher bond proposed.
- Concern regarding slot on south elevation which disengages the bottom storeys to the left and right of the main staircase.
- Brickwork and detailing needs to be refined.
- Scheme should have gone further by exploring its edges and how the development relates to the public realm, particularly the space to the southwest currently used for motorcycle parking. Missed opportunity to improve that space and provide a better connection between the ground floor and public realm.
- Not convinced that proposed glass balustrades sit comfortably in a building that should have a robust industrial typology.

### **Applicant's Consultation**

- 8.8 The applicant did not carry out any local consultation at pre-application stage.

### **External Consultees**

- 8.9 City of London Corporation (commented 23/08/2017) – No observations, provided that affected premises within the City of London have been consulted, and that any impact (e.g., regarding daylight and sunlight, and construction and servicing management) on residential properties within the City of London has been taken into consideration.
- 8.10 Historic England (Greater London Archaeology Advisory Service) (commented 17/01/2017) – The submitted Historic Environment Assessment (MoLA, October 2016) indicates that the site's main potential is for archaeological remains associated with development from the 17<sup>th</sup> century and later. Site is close to the junction of two Roman roads, however the submitted assessment concludes that there is no evidence for Roman activity within the vicinity of the site. Site was likely to have lied within the hinterland of the Roman city, 550m to the south. Submitted assessment also concludes that, although the existing building includes a basement, based on current evidence it is likely that there would be archaeological survival below the basement floor slab, and any surviving remains would be completely removed by the proposed deeper basement level. Field evaluation is needed to determine appropriate mitigation. Although the NPPF envisages evaluation being undertaken prior to determination, in this case a condition could provide an acceptable safeguard. Recommend condition (18) requiring a two-stage process of archaeological investigation comprising an evaluation to clarify the nature and extent of surviving remains, followed (if necessary) by a full investigation. Informative also recommended. Further advice provided as to what the archaeological fieldwork would comprise.
- 8.11 Metropolitan Police – Designing Out Crime Officer (commented 03/01/2017) – There are multiple routes into the core of the building. Queried if internal door from cycle store into the core is necessary and could be omitted – if required, it should be access-controlled, and both external and internal doors to the cycle store should be PAS24 rated. Another door from stair core to the outside should also be PAS24 rated and audibly alarmed to deter misuse.
- 8.12 In further comments dated 19/09/2017, the new Designing Out Crime Officer stated that the proposed building was a good design with fewer recesses than the existing

building, however security measures are not considered in the Design and Access Statement, and the number of entry points into the building is of concern. Office space can be accessed without two lines of security, which is not recommended. Detailed advice provided regarding British Standards and security measures.

- 8.13 Thames Water (commented 22/12/2016) – Applicant should incorporate measures to avoid risk of backflow. Developer should demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Informative recommended regarding groundwater discharge. Recommend condition (28) requiring details of a piling method statement. Developer is responsible for making proper provision for surface water drainage. Public sewers cross or pass close to the site, and approval should be sought from Thames Water where a new building would be above or within 3 metres of a public sewer. Informative recommended regarding Thames Water main crossing the site. No objection in relation to sewerage and water infrastructure capacity. Informative recommended regarding water pressure.

### **Internal Consultees**

- 8.14 Building Control team (commented 21/09/2017) – No objections, however more detailed information would be needed to ascertain whether the proposed development would be acceptable in terms of fire safety. Regarding the need for an alternative means of escape for every storey above 11m and concerns regarding extending the single staircase to basement level, the applicant's proposal for a mechanically ventilated protected lobby and smoke control lacks detail – clarification would be needed as to whether this would involve positive or negative pressurisation, for example, and successful examples of this purportedly “common place” solution would be useful. A protected firefighting shaft (core) is required for every storey above 18m. Although the applicant states that the stair core would be a firefighting shaft, little detail of this proposal (and the extent to which it is relied on as a solution) has been provided. More than one exit onto the core would be needed if only one staircase is proposed. An automatic fire detection system would be needed, as a basement-ground floor staircase would be located close to an escape door. Proposed mobility scooter locations are unacceptable – these, and the proposed refuse/recycling store, will need fire-rated enclosure and appropriate ventilation to the outside. No items should be stored in a firefighting shaft, unless related to firefighting. Proposed refuge locations are unacceptable, and an evacuation strategy for people with disabilities is needed. Justification and calculation will be required in relation to the extent of unprotected area in the proposed elevations in relation to the surrounding streets' width. Fire brigade access to more than 15% of the site's perimeter (from the street) would be available. The proposed external materials for the new building's elevations are not known to be flammable, however full details would be required, and appropriate compartmentation will be necessary to inhibit fire spread, as noted by the applicant as a potential solution.
- 8.15 Design and Conservation Officer (commented 01/08/2017) – The tiering of the top storeys is not ideal, however the balustrades are now to be frameless glass, which is welcomed. Rooftop louvred plant enclosure is of concern, and adds to concerns regarding the complex and cluttered roofline. Reiterate earlier concerns regarding signage/lettering proposed to corner. Use of a stack bond to the brick recesses is not supported – these parts of the elevations should be completed either with the same brick as the rest of the building (but in a stretcher bond, with the main areas of

brickwork in a Flemish bond), or in the same bond as the rest of the building but with a different brick. Further verbal comment 11/09/2017 – no objection to the proposal as now amended. The elevational composition has improved, the ground floor would now appear less squat, and the top two storeys would appear less heavy. The proposed additional column of windows and Flemish bond are welcomed.

- 8.16 Energy Conservation Officer (commented 09/01/2017) – Recommend the application is not approved until further evidence has been submitted and reviewed. The applicant proposes a 52.4% reduction in regulated carbon emissions against Building Regulations 2013 which far exceeds the 35% target set out in the London Plan. However, the applicant proposes a total (regulated and unregulated) carbon emission reduction of 24.5% against Building Regulations 2013, failing to meet the requirements of Islington’s policies to achieve a reduction of 27% where connection to a decentralised energy network (DEN) is not possible. The applicant should look at further measures to meet the 27% carbon reduction target. As the development is within 500m of both the Citigen and Bunhill DENs evidence is needed to show that the feasibility of connection has been explored with LB Islington and E.ON. Evidence also needed regarding the developments in the surrounding area considered for a possible shared heat network (SHN). Monthly heat load information (to justify exclusion of a site-wide communal heating system and CHP), justification for the use of air source heat pumps and instant electric water heaters, and clarification regarding thermal comfort is needed. Air permeability should be reduced. Should a conventional communal heating system be demonstrated to be not feasible, protected pipework routes are required for all floors. The addition of further photovoltaic panels to the roof should be explored.
- 8.17 In further comments received on 19/09/2017, the Energy Conservation Officer noted that the proposed carbon dioxide has been increased to 26% against Building Regulations 2013, but advised that the applicant should be required to meet the 27% target, which could be achieved by increasing the size of the PV array or specifying higher performance PV panels. The proposed air permeability has been improved to meet the recommendations of the Environmental Design SPD. The Bunhill DEN team have advised that it is currently not feasible to extend the network across Old Street for a development of this size. Accepted that the proposed air source heat pump would be more efficient than a gas-fired communal boiler.
- 8.18 Inclusive Design Officer (commented 15/08/2017) – In response to the amended drawings submitted on 03/05/2017, the single accessible cycle rack is welcomed. Other concerns previously raised, however, have not been adequately addressed. No information regarding on-street parking (required at a ratio of one space per 33 employees) and safe drop-off has been provided. The proposed facility for the storage of a mobility scooter within the stairwell is not workable as this would represent a fire risk – the storage space must be physically separated from the building’s escape route. The refuges shown within the lift lobbies are unusable as they would obstruct access to the firefighting lift. A single refuge on each floor effectively limits the number of mobility-impaired people permitted on a floor (other than the ground floor) to one. For the double doors at both office entrances, at least one leaf of each should provide a clear opening width of 1000mm and the opening weight should not exceed 30 Newtons, unless the doorset is automated (clarification is requested). The lack of a WC at entrance level is problematic. The basement “accessible” WC needs a corridor at

least 1500mm wide. The development lacks an accessible shower facility and locker room. Glazing at ground floor level will need surface manifestations at 850mm and 1500mm above finished floor level.

- 8.19 Planning Policy (commented 26/01/2017) – Principle of an uplift in commercial floorspace at this location in an Employment Priority Area (General) is supported. Finsbury Local Plan policy BC8 states that in such areas, where appropriate, developments must also include retail or leisure uses at ground floor alongside a proportion of non-B1(a) floorspace, or office or retail space that may be suitable for occupation by small or medium-sized enterprises (SMEs) by virtue of its design, size or management, or affordable workspace. Proposed development would be entirely B1(a), and likely to be let on a floor-by-floor basis. No single floor would fall within the Finsbury Local Plan's definition of floorspace likely to appeal to SMEs. No non-B1(a) floorspace is proposed, and the affordable workspace component is proposed in the form of off-site contributions [NB – this was subsequently amended, and space for SMEs is now proposed]. Given paragraph 11.1.2 of the Finsbury Local Plan, the qualitative and quantitative proposed uplift in commercial floorspace, and the recommendations of the council's 2016 Employment Study, the principle of an entirely-B1(a) development in this location is acceptable. Policies and officers do not suggest that retail or leisure use would be desirable in this location.
- 8.20 Proposal meets requirement of policy BC8 (part Aii) to maximise business floorspace.
- 8.21 Policy BC8 (part B) seeks affordable workspace. This should be provided on-site, however off-site contributions can be acceptable where on-site is not possible or appropriate.
- 8.22 Policy BC8 (part D) and London Plan policy 4.3 requires all major developments involving an uplift in office floorspace to also include residential use. Equivalent contributions (for the provision of housing off-site) will be sought where the residential floorspace is less than 20% of the floorspace uplift. The applicant's proposal to make a full off-site contribution (following the formula set out in the council's Planning Obligations SPD) is acceptable. The arguments made regarding separate access, additional external storage, fire escape routes, and the relatively small uplift in residential floorspace are persuasive. In line with this conclusion, regard must be had to the council's Employment Study which identifies requirements for office floorspace and recommends the council looks sympathetically on intensification of office floorspace within the CAZ.
- 8.23 Pollution Team, Public Protection (commented 12/11/2017) – Existing building has a ramshackle assortment of air conditioning units on the Memel Court elevation, and a dedicated plant area would be easier to mitigate in relation to noise outbreak. For a rooftop plant area, developer would need to install a semi-enclosure with acoustic louvres and of a sufficient height, to mitigate noise. Applicant's report only assesses plant noise against daytime background noise levels, yet noise levels drop off significantly outside daytime. Conditions recommended to control the impact of plant noise (26 and 27).
- 8.24 Regarding site contamination, the site would be covered by hardstanding and a basement. The likelihood of a pollution linkage is limited, but the applicant is advised to

keep a watching brief and undertake site testing (as set out in the applicant's report), and the Pollution Team would not advise applying a specific condition in relation to site contamination.

- 8.25 The applicant's submission includes a generic construction management plan. The development would involve substantial demolition in close proximity to existing office and residential uses. Recommend condition requiring a detailed site specific management plan.

## **9 RELEVANT POLICIES**

- 9.1 Details of all relevant policies and guidance notes are attached in Appendix 2. This report considers the proposal against the following Development Plan documents:

### **National Policy and Guidance**

- 9.2 The National Planning Policy Framework 2012 seeks to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF is a material consideration and has been taken into account as part of the assessment of these proposals.
- 9.3 Since March 2014 Planning Practice Guidance for England has been published online.

### **Development Plan**

- 9.4 The Development Plan comprises the London Plan 2016 (incorporating Minor Alterations), Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013. The policies of the Development Plan that are considered relevant to this application are listed at Appendix 2 to this report.

### **Designations**

- 9.5 The site has the following designations under the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013:

- Bunhill and Clerkenwell key area
- Central Activities Zone
- Employment Priority Area (General)
- Primary employment location
- St Luke's Conservation Area
- Archaeological Priority Area

- 9.6 The site is immediately adjacent to the Hat and Feathers Conservation Area.

### **Supplementary Planning Guidance (SPG) / Document (SPD)**

- 9.7 The SPGs and SPDs which are considered relevant are listed in Appendix 2.

## 10 ASSESSMENT

10.1 The main issues arising from this proposal relate to:

- Principle of development
- Land use
- Design and conservation
- Archaeology
- Inclusive design
- Neighbour amenity
- Financial viability
- Sustainability, energy efficiency and renewable energy
- Highways and transportation
- Servicing
- Fire safety
- Contaminated land and air quality
- Planning obligations

### **Principle of Development**

- 10.2 The site is in a highly accessible location, within an area where relevant planning policies encourage the renewal and modernisation of existing office stock. At best, the site's existing building makes a neutral contribution to the character and appearance of the St Luke's Conservation Area and the adjacent Hat and Feathers Conservation Area, and to the settings of listed buildings to the north and south. The existing building is dated, inefficient, inflexible, and offers poor accessibility to people with disabilities. Redevelopment of the site is considered acceptable in principle, as it provides an opportunity to reprovide office floorspace to a better standard than currently exists, and to use this relatively central and accessible site more efficiently. These are benefits of the proposed development which weigh positively in the balance of planning considerations relevant to this application.
- 10.3 Section 4.01 of the submitted Design, Heritage and Planning Statement explains how the applicant team considered the feasibility of a refurbishment of the site's existing building. Noting the poor construction quality of the existing building, its very limited accessibility, poor energy performance, inefficient internal arrangement, inadequate basement floor-to-ceiling height, and dated appearance (which may deter design-conscious tenants), the applicant concluded that refurbishment would not be appropriate. Officers agree that – even taking into account the potential sustainability benefits of retaining and reusing the existing building, and the potential for less impact upon neighbour amenity – refurbishment would not achieve a significant improvement on the existing situation (including in relation to the quality of site's existing employment floorspace), and would not be worthwhile.
- 10.4 The above in-principle position regarding redevelopment of the site accords with the National Planning Policy Framework's presumption in favour of sustainable development.

## **Land Use**

### *Office use*

- 10.5 The site's existing building currently provides 1,657sqm GIA (1,329sqm NIA) of B1 floorspace, including ancillary spaces.
- 10.6 No site allocation applies to the application site, however it is located within the Central Activities Zone (CAZ) and an Employment Priority Area (General).
- 10.7 Planning policies relevant to this site safeguard existing employment floorspace, and generally encourage office development. The renewal and modernisation of existing office stock in viable locations is also supported. The supporting text of London Plan policy 4.2 identifies a need for significant increases in office floorspace in the years to 2031. Part B of policy CS13 of Islington's Core Strategy 2011 states that in relation to existing employment floorspace, development which improves the quality and quantity of existing business floorspace provision will be encouraged. Part Aii of policy BC8 in the Finsbury Local Plan 2013 states that within Employment Priority Areas (General and Offices), proposals should incorporate the maximum amount of business floorspace reasonably possible on the site. The recommendations of the council's 2016 Employment Study are also noted.
- 10.8 The proposed development would provide 2,337sqm GIA (1,776sqm NIA) of B1 floorspace. Notwithstanding other planning considerations, the proposed uplift in B1 floorspace (680sqm GIA, 447sqm NIA) is welcomed and is considered policy-compliant. Given the constraints of the site and officers' view that non-B1 uses need not be provided at this particular site (discussed later in this report), it is accepted that the development would incorporate the maximum amount of business floorspace reasonably possible, in compliance with part Aii of policy BC8 of the Finsbury Local Plan.
- 10.9 The proposal would provide a higher quality, more accessible and more flexible employment space than the existing buildings currently offer.
- 10.10 Floor-to-ceiling heights of over 3.5m (basement) and 3m (ground to sixth floors) are proposed in compliance with the standard set out at paragraph 5.10 of the Development Management Policies document.
- 10.11 Natural light would reach the proposed basement via voids at street level behind the Sycamore Street elevation. These voids have been increased in size since the DRP expressed concern regarding the quality of the basement spaces and the amount of natural light that would reach them. Light would also pass through two of the staircases proposed between the ground floor and basement. Natural light to the basement would be reliant upon no obstructions being placed over the voids – to ensure this does not happen, condition 8 is recommended.
- 10.12 Part B of policy BC8 of the Finsbury Local Plan states that in the Employment Priority Area (General), the employment floorspace component of a development proposal should not be unfettered commercial office (B1(a)) uses, but must – where appropriate – include retail or leisure uses at ground floor level. However, given the character and ground floor uses of these parts of Sycamore Street, Baltic Street West, Memel Court

and Crescent Row (which are predominantly B1 in use), it is not considered appropriate to secure non-B1 uses at this site.

- 10.13 Part B of the same policy goes on to state that developments should also include a proportion of non-B1(a) business or business-related floorspace, and/or office or retail floorspace that may be suitable for accommodation by micro and small enterprises, and/or affordable workspace. During the life of the application, the applicant amended the proposed floor plans to show 70sqm (GIA) at basement level and 50sqm (GIA) at ground floor level partitioned to provide two units (on separate floors, albeit both accessed from the same external entrance on Crescent Row and connected internally by a staircase, platform lift and void) that would be suitable for occupation by micro or small enterprises by virtue of their size. Paragraph 11.1.5 of the Finsbury Local Plan defines “micro and small” workspaces as those in business use with a gross internal floor area of around 90sqm (GIA) or less, either physically separated or as components of an open plan floorplate, and which will be offered to occupants on favourable flexible terms.
- 10.14 With a total of 120sqm (GIA) of such floorspace (suitable for micro and small enterprises) proposed in a development of 2,337sqm (GIA), an on-site provision of 5.1% would be achieved.
- 10.15 Details of the terms under which the spaces would be offered are required under recommended condition 14. It is also noted that other parts of the proposed development, including in its upper floors, could be subdivided to provide suitable accommodation for micro and small enterprises without the quality (including natural lighting) of the remaining business floorspace being compromised, although further separate street entrances or cores could not be provided without reducing usable B1 floorspace.
- 10.16 No workspace which is affordable in terms of its rental rate is proposed. Given the “and/or” wording of part B of policy BC8 of the Finsbury Local Plan, however, and given that the proposed development includes office floorspace that would be suitable for occupation by micro and small enterprises by virtue of its design and size (thus meeting part Bii of policy BC8), the council cannot insist upon the provision of affordable workspace on site as part of the proposed development.
- 10.17 Part I of policy BC8 of the Finsbury Local Plan requires new business (including office) floorspace to be designed to allow for future flexibility for a range of uses, including future subdivision and/or amalgamation for a range of business accommodation. The proposed B1 floorspace would be accessed from a lift and stair core in the east corner of the building, so that all of the B1 floorspace could be occupied by a single organisation, or each floor could be separately occupied. Further subdivision of each floor would also be possible, as open floor plans and adequate floor-to-ceiling heights are proposed, allowing for a flexible fit out.
- 10.18 The 1,329sqm (NIA) of office floorspace in the existing building could accommodate between 102 and 166 employees (full time equivalent, or FTE), based on the Home and Communities Agency’s (HCA’s) ratios of one employee per 8-13sqm NIA of offices (note that different ratios are given for different types of offices: one employee per 8sqm in a call centre, one per 11sqm in the technology, media and telecom (TMT)

sector, and one per 13sqm in corporate offices, for example). With the 1,776sqm (NIA) of offices now proposed, between 137 and 222 employees (FTE) could be accommodated, using the same ratios.

#### *Affordable housing contribution*

- 10.19 With regard to the provision of residential accommodation as part of the development (as required by London Plan policy 4.3 and Finsbury Local Plan policy BC8), paragraph 11.1.6 of the Finsbury Local Plan confirms that proposals which would result in a net increase of office floorspace should provide at least 20% of the total net increase in floorspace as housing. In this case, with a total uplift in office floorspace of 680sqm (GIA) proposed, 136sqm of residential floorspace would be required.
- 10.20 Although the provision of residential floorspace would not be physically impossible at this site, given the requirement for full separation of uses in accordance with part I of Finsbury Local Plan policy BC8, on-site residential use at this site is likely to result in an unacceptable reduction in B1 floorspace, or another significant compromise, unless the building envelope was increased further (which, as explained later in this report, is not considered possible). Instead, a financial contribution towards off-site affordable housing would be appropriate. This would be in lieu of on-site provision of residential accommodation and – in accordance with part D of policy BC8 and the formula on page 43 of the Planning Obligations (Section 106) SPD – officers have calculated this contribution to be £108,752.

#### *Other land use considerations*

- 10.21 The application site is within Flood Zone 1 (and has a low probability of flooding), is less than one hectare in size, and is not within a Local Flood Risk Zone. The applicant was not required to submit a Flood Risk Assessment with the application. Sustainable urban drainage is considered in the Sustainability section of this report.

#### **Design and Conservation**

- 10.22 The National Planning Policy Framework confirms that the Government attaches great importance to the design of the built environment, and notes that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Planning policies relevant to design and conservation are set out in chapter 7 of the London Plan. Policies CS7, CS8, CS9 and CS10 in Islington's Core Strategy, policy BC7 in the Finsbury Local Plan, and policies in chapter 2 of Islington's Development Management Policies, are also relevant. Historic England's Historic Environment Good Practice Advice in Planning Note 3 (The Setting of Heritage Assets), the council's Urban Design Guide SPD and Conservation Area Design Guidelines (CADG) for the St Luke's and Hat and Feathers Conservation Areas, and the Mayor of London's Character and Context SPG are also relevant to the consideration of the current application.
- 10.23 The CADG for the St Luke's and Hat and Feathers Conservation Areas identify the characteristic features of those conservation areas – these are discussed later in this report where relevant to the proposed development.

### *Site and surroundings*

- 10.24 The site's existing building is described at paragraph 5.1 of this report.
- 10.25 The context of the site must be noted. To the southwest is an undeveloped space with a single sycamore tree surrounded by motorcycle parking spaces. Beyond this, further to the west, is the rear elevation (including a vehicular entrance) of 60 Goswell Road. Closer to the application site is 1-3 Crescent Row, a four-storey building with a red and white brick elevation facing southeast. At the corner of Crescent Row and Sycamore Street, 5 Crescent Row rises to five storeys (including a top storey set behind a roof terrace), and 1-2 Sycamore Street rises to four storeys – both these buildings have brick (London stock, red, and painted white) elevations. On the opposite corner, Dynamis House (6-8 Sycamore Street) has robust, London stock elevations, rises to four storeys, and has a flat roof in use as a terrace. Further east, the rear elevation of 12 Old Street faces the application site – although this is a Grade II listed building, its rear elevation is much altered, and rises to six (mostly tile-clad) storeys. 14-18 Old Street is an office building with a five-storey rear elevation directly to the north of the application site. The narrow building between Crescent Row and Memel Street has a blank elevation (three storeys of brick, plus two storeys above with grey cladding) facing southwest. 24-26 Baltic Street West is a five-storey building with brick elevations, significant roof-level structures, and windows facing the application site. To the south of Sycamore House, Hatfield House stands behind two street trees, a row of concrete bollards and a vehicular ramp to a basement car park, and rises to seven storeys. This building has a long elevation to Baltic Street West, with brick, concrete balconies, and blue cladding panels facing Sycamore House. The four-storey north elevation of Crescent House lies to the southwest of the application site.
- 10.26 Although the buildings surrounding the application site are of a variety of designs, have elevations with a variety of materials, and accommodate a variety of uses, many share a robust, warehouse appearance and character, have brick elevations, and date from the Victorian period. This is recognised in the CADG for the St Luke's Conservation Area, which notes at paragraph 16.2 the area's narrow side streets which contain a wide range of 19<sup>th</sup> century commercial buildings.
- 10.27 The site is within a relatively sensitive location in terms of heritage assets. The St Luke's Conservation Area covers the site and land to the east. The Hat and Feathers Conservation Area covers land and buildings immediately to the north and west. To the south, in the City of London, is the Golden Lane Estate, within which the abovementioned Hatfield House is Grade II listed, and Crescent House is Grade II\* listed. To the north, 12 Old Street (the former Old Rodney's Head PH) is Grade II listed. Several other nearby buildings make a positive contribution to the St Luke's and Hat and Feathers Conservation Areas. The site is in the Moorfields Archaeological Priority Area.



Image 1: existing southwest elevation



Image 2: proposed southwest elevation

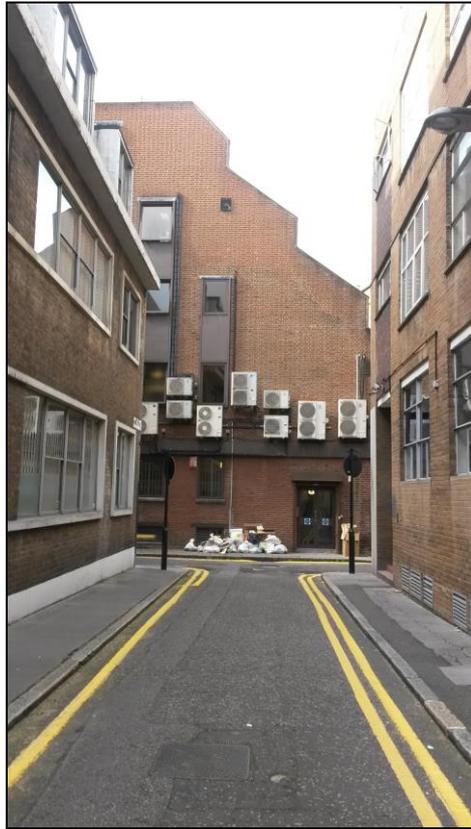
### *Demolition of existing buildings*

- 10.28 On 01/10/2013, under the Enterprise and Regulatory Reform Act 2013, the need for Conservation Area Consent for the demolition of unlisted buildings in conservation areas was removed. Such works now require planning permission.
- 10.29 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on the council to pay special attention to the desirability of preserving or enhancing the character and appearance of the St Luke's Conservation Area (and the adjacent Hat and Feathers Conservation Area) when determining this application. Paragraph 138 of the NPPF states that the loss of a building which makes a positive contribution to the significance of a conservation area should be treated either as substantial or less than substantial harm, taking into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole.
- 10.30 Part C of policy BC7 in the Finsbury Local Plan states that new development should not result in the demolition or amalgamation of buildings with existing character value.
- 10.31 Paragraph 16.7 of the CADG for the St Luke's Conservation Area states that permission for demolition will only be granted where demolition and redevelopment would positively enhance the character and appearance of the area.
- 10.32 The site's existing building dates from 1936, but is much-altered, having undergone a major extension and refurbishment in or after 1988, and further alterations in or after 1991. The building has a dated appearance, is not of historic or architectural merit, and currently does not make a significant positive contribution to the significance, character and appearance of the St Luke's Conservation Area, or the adjacent Hat and Feathers Conservation Area. At best, the existing building makes a neutral contribution to these conservation areas, and given this contribution, and the potential for a replacement building to make a more contextually-appropriate and positive contribution, it is considered that the demolition of the site's existing building would not be in breach of paragraph 138 of the NPPF, is compliant with part B of Development Management Policy DM2.3 and paragraph 16.7 of the CADG, and is acceptable.
- 10.33 Of note, Islington's DRP welcomed the opportunities brought by the proposed scheme to improve upon the site's existing conditions, and noted that the existing building's "bizarre" raked form does not contribute to the site's context or to the streetscape.

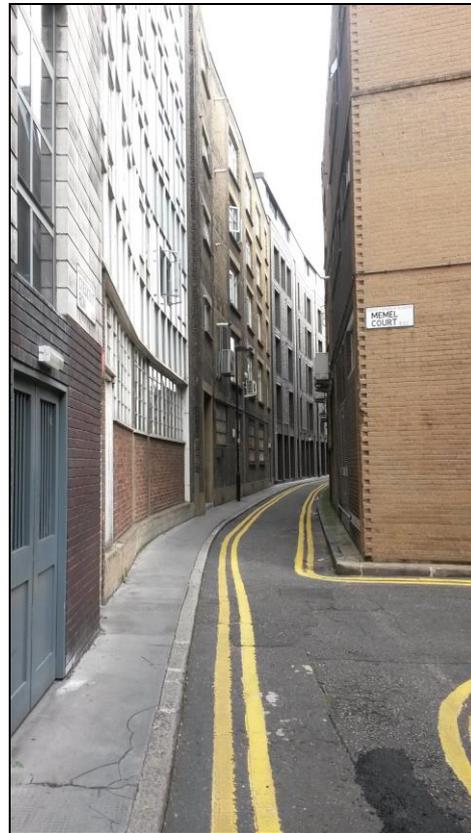
### *Height and massing*

- 10.34 London Plan policy 7.4 states that development should have regard to the scale, mass and orientation of surrounding buildings, and that buildings should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass. London Plan policy 7.6 states that buildings should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm, and should not cause unacceptable harm to the amenity of surrounding land and buildings. The Mayor of London's Character and Context SPG notes at paragraph 7.26 that "the key or essential characteristics of a place provide an important reference point against which change can be assessed or as a 'hook' for site planning and design".

- 10.35 At the local level, policy CS9 of Islington's Core Strategy sets out an aim for new buildings to be sympathetic in scale and appearance and to be complementary to local identity. Policy DM2.1 of Islington's Development Management Policies requires development to be based upon an understanding and evaluation of an area's defining characteristics, confirms that acceptable development will be required to respect and respond positively to existing buildings, and sets out a list of elements of a site and its surroundings that must be successfully addressed – this list includes urban form including building heights and massing. Part B of policy BC7 in the Finsbury Local Plan states that new buildings should be of a height, scale and massing that respects and enhances the immediate and wider context, consistent with the predominant building height. The same policy states that new development should reflect long established building lines, street frontages and plot widths.
- 10.36 Paragraph 16.9 of the CADG for the St Luke's Conservation Area states that existing and established building lines should be retained, that new buildings should conform to the existing prevailing parapet and roof heights in the conservation area, and that new buildings should respect the existing plot sizes. Paragraph 16.10 adds that three storeys to parapet, plus a mansard or gabled fourth storey, would normally be acceptable within the conservation area, but that a higher scale may be possible on Old Street and Central Street.
- 10.37 Given the site's context, modest, medium-scaled development would be appropriate for this site.
- 10.38 The proposed elevations would meet the back of the pavement of all four of the site's surrounding streets, and as a result would respect and reinforce the existing building lines of those streets. It would not be appropriate to set the building back from the pavement at this site at ground level. Above ground level, and notwithstanding other planning considerations, it is considered appropriate to provide massing and vertical elevations that – at least for the first few storeys – meet the back of the pavement. The existing building's stepped and sloped (or raked) massing on its northwest side gives the building an incongruous and contrived appearance, is uncharacteristic of the area, and sits uncomfortably in its context. Islington's DRP recognised that the form of the proposed building would generally be more appropriate and responsive to the site's context than the existing building is. Although providing a four-storey vertical elevation along Crescent Row would result in a dramatic height-to-width ratio along a very narrow street (elevation-to-elevation distances would be a little over 4m), tight, dense development is not unusual in parts of historic Bunhill and Clerkenwell where historic street layouts have survived. Indeed, three- and five-storey elevations already stand less than 5m apart along much of Crescent Row to the northeast of the application site. To the southwest and south of the application site are undeveloped spaces and these, together with the relatively wide Baltic Street West, would provide some openness and relief to the dense development that is proposed (and that already exists).



Photographs 5 and 6: existing building's incongruous stepped and sloped massing



Photographs 7 and 8: narrow width of Crescent Row

- 10.39 Although the proposed development's footprint would fill the site at ground to third floor level, a small setback is proposed along Crescent Row at fourth floor level, and greater setbacks are proposed to the Crescent Row and Sycamore Street edges of the building at fifth and sixth floor level. These top two storeys would be clad in bronze-coloured shingles, as opposed to brick. The proposed seven storeys above ground level would respect and would sit comfortably within the site's context. Although taller than many buildings to the north, the parapet above the fourth floor, and the change in materials between the fourth and fifth floors, would reference these adjacent heights, and the proposed building would be similar in height to the tallest parts of the adjacent building at 24-26 Baltic Street West. The undeveloped space to the southwest of the application site, and the space provided by the wide pavement and vehicular ramp in front of Hatfield House, provide a context in which an increase in height at the application site can be accommodated. Finally, the proposed setbacks would help ensure the development would not appear unduly obtrusive or overdominant in views from street level.
- 10.40 Notwithstanding the amenity impacts discussed later in this report, in terms of height and massing it is considered that the proposed development demonstrates sufficient sensitivity to the site's context, would not unacceptably interrupt the pattern of heights found in this densely-developed part of the borough, and is acceptable in townscape terms. It is noted, however, that the height and massing proposed is likely to be the maximum acceptable at this site. The council's Design and Conservation officer and Islington's DRP raised no objection to the proposed form, height and massing. The proposed height of the development is considered further in relation to impacts upon heritage assets later in this report.

#### *Architecture and elevations*

- 10.41 London Plan policy 7.6 states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It goes on to set out criteria against which planning applications should be assessed, stating that buildings should be of the highest architectural quality, should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm, and should comprise details that complement, not necessarily replicate, the local character.
- 10.42 Other policies are also relevant to architecture, including London Plan policy 7.4 (relating to local character) and Core Strategy policy CS9, which states that high quality architecture and urban design are key to enhancing and protecting Islington's built environment, making it safer and more inclusive. This Core Strategy policy goes on to state that new buildings should be sympathetic in appearance to the local identity, should be based on coherent street frontages, and should fit into the existing context of façades. Finally, part G of policy CS9 notes that high quality contemporary design can respond to relevant challenges as well as traditional architecture, and that innovative design is welcomed.
- 10.43 Policies in chapter 2 of the Development Management Policies document are relevant to architecture and detailed design. In particular, policy DM2.1 states that all forms of development are required to be of high quality. Part B of policy BC7 in the Finsbury Local Plan states that new buildings should be of a high architectural quality and local

distinctiveness. Part E of the same policy requires the use of vernacular and other high quality, complementary materials within new buildings. Further guidance is provided in Islington's Urban Design Guide SPD and the CADG for the St Luke's Conservation Area.

- 10.44 The applicant has amended the proposed design in response to the comments of officers and the DRP, and a much improved, well-proportioned and contextually-appropriate development is now proposed. Of particular note, the applicant has addressed concerns regarding the elevational composition by eliminating the previously-proposed brick horizontal elements (which emphasises and visually strengthens the vertical brick piers) and proposing larger windows at ground floor level (contrasting with the divided windows above). This has resulted in the ground floor no longer appearing squat, which was a key concern of officers and the DRP, and which has been difficult to resolve given that the height of the ground floor (and therefore the building's overall height) could not be increased without creating unacceptable design and amenity impacts. The proposed building certainly has a strong vertical emphasis, possibly even more so than in previous iterations of the scheme – this vertical emphasis was a concern of the DRP (expressed in the context of their comments on the applicant's previous unsuccessful attempt to reflect the robust Victorian warehouse buildings nearby), however officers are of the view that this is not problematic, given the vertical emphasis that predominates the area's older building stock, including 2 Old Street which has brick piers rising from the pavement to third floor level. With the vertical emphasis and amount of glazing now proposed, it is debatable whether the architecture of adjacent buildings has been strongly and successfully reflected, however given that a good design has nonetheless been achieved, it is not recommended that further amendments be sought. With the most recent changes to the proposed design, the hierarchy of the elevations has been improved such that the top two storeys now appear less heavy in the context of the strong five storeys below.
- 10.45 The applicant proposes curved brickwork to the building's corners on Baltic Street West/Sycamore Street, and Baltic Street West/Memel Court. In response to the concerns of the council's Design and Conservation officer and Islington's DRP (that an excessively large expanse of brickwork was proposed at the building's east corner), the applicant now proposes an additional column of windows to the Baltic Street West elevation, exposing the workings of the passenger lift. This would appropriately reduce the expanse of brickwork to this corner, and – together with the large ground floor windows now proposed – would add interest and activation to the street in accordance with part Aii of Finsbury Local Plan policy BC7 and Islington's Urban Design Guide. Recommend condition 7 requires details of how the workings of the lift would be exposed behind the windows.
- 10.46 To the building's south corner, curved windows are proposed. These are considered appropriate, and have been used successfully in other recent developments including the Turnmill building and the Lexicon.
- 10.47 Brick recesses – using a lighter grey contrasting brick – are proposed at ground to fourth floor level and these recesses, together with the reveals of the windows which would be set within the lighter brickwork, would ensure adequate relief to the elevations. A condition requiring minimum reveal depths of 200mm is recommended (condition 5).



Image 3: view from southwest

### *Materials*

- 10.48 Part E of Finsbury Local Plan policy BC7 requires development proposals to use vernacular and other high quality, complementary materials. Paragraph 16.11 of the CADG for the St Luke's Conservation Area states that, for new development, materials should be sympathetic to the character of the area, in terms of form, colour and texture. Paragraph 16.12 adds that, on new buildings, modern materials such as steel and glass may be appropriate, and the council will encourage good modern design. Further, detailed guidance is provided in Islington's Urban Design Guide from paragraph 5.111 onwards.
- 10.49 The proposed palette of materials includes a multi grey stock brick (such as Petersen Tegl D72) to the principal piers at ground to fourth floor levels, and a lighter grey contrasting brick to the vertical recesses. Windows and doors would be framed with aluminium in a "dark umber" anodised finish. Light bronze shingle cladding is proposed to the fifth and sixth floors. Pale/light grey copings are proposed to the tops of the brick elevations.
- 10.50 Considered together, the proposed materials are considered appropriate for this site and its context, however the precise colours, textures, detailing and method(s) of fixing would need to be carefully controlled, given the sensitivities of the site and the need to ensure high quality, appropriate materials are used. The detailing and fixing of the

materials is also considered particularly important, given that many good designs have been let down by poor execution and attention to detail. Recommended condition 3 requires the submission and approval of details and samples of all external materials.

- 10.51 The applicant no longer proposes areas of stack bond brickwork, which officers considered to be poor detail that resembles tiling. In response to the DRP's concerns regarding the use of a stretcher bond to the proposed brick elevations, the applicant's latest elevational drawings indicate that the brickwork of the principal piers would be laid in a Flemish bond. This is considered appropriate for such a location within the St Luke's Conservation Area, and an appropriate bond would help avoid the development's larger areas of blank brickwork appearing monotonous. Stretcher bond would not be appropriate for these elevations. It is recommended that Flemish bond be secured, and recommended condition 3 has been worded to reflect this.
- 10.52 Frameless glass balustrades are proposed at fifth and sixth floor levels. Notwithstanding the comments of the DRP regarding these features, officers remain of the view that the use of clear glazing is necessary to limit the visual impact of the balustrades.
- 10.53 Further wording to condition 3, requiring the submission of a Green Procurement Plan to demonstrate how the procurement of materials for the proposed development would promote sustainability, is also recommended.

#### *Impacts on heritage assets*

- 10.54 It is again noted that the council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of the St Luke's Conservation Area (and the adjacent Hat and Feathers Conservation Area) when determining this application.
- 10.55 Policy DM2.3 states that new developments within Islington's conservation areas are required to be of high quality contextual design so that they conserve or enhance a conservation area's significance. Harm to the significance of Islington's conservation areas will not be permitted unless there is a clear and convincing justification. Substantial harm to the significance of a conservation area will be strongly resisted. Part C of policy BC7 in the Finsbury Local Plan requires the conservation and enhancement of heritage assets.
- 10.56 Section 12 of the National Planning Policy Framework, London Plan policy 7.8 and Core Strategy policy CS9 are also relevant.
- 10.57 The CADG for the St Luke's Conservation Area recognise the mixed commercial, institutional, recreational and residential character of the area, and state that the council will seek retain this mixed use character.
- 10.58 The proposed development is considered appropriate in terms of its impact upon the St Luke's and Hat and Feathers Conservation Areas. Regarding the proposed height and scale of the new building, paragraph 16.9 the Conservation Area Design Guidelines for the St Luke's Conservation Area states that new buildings should conform to the existing prevailing parapet and roof heights in the conservation area, it is noted that existing heights surrounding the application site vary, and – as considered earlier in

this report – the proposed seven-storey building would sit comfortably within its context. The guidance provided at paragraph 16.10 of the CADG (“Three storeys to parapet, plus a mansard or gabled fourth storey would normally be acceptable”) is not considered entirely relevant to the application site, given its immediate context, and it is noted that the CADG does not rule out the approval of seven-storey buildings where they would be appropriate to their context.

- 10.59 The detailed design and materials of the proposed development are considered appropriate in the way they would relate to their context. As noted above, paragraphs 16.11 and 16.12 of the CADG note that vernacular materials such as stock brick are used in the conservation area, and note that new development should be sympathetic to the area’s character. With brick proposed as the primary material, the proposed development would complement the materials immediately adjacent and opposite. As noted earlier in this report, the vertical emphasis of the proposed elevations would reflect the vertical emphasis that predominates the area’s heritage assets.
- 10.60 The nearest listed building is 12 Old Street, however this building has a much-altered (reclad, and possibly rebuilt) rear elevation facing the application site. The significance and setting of this heritage asset would not be adversely affected by the proposed development. To the south of the application site, Hatfield House (Grade II listed) is set away from the back of the pavement, and is sufficiently large to not be overwhelmed, humbled or demoted by the seven-storey building proposed opposite. Other listed buildings are not immediately adjacent to the application site. The proposed development would not harm the setting of or detract from the significance of these heritage assets.
- 10.61 The proposed development would not result in the loss of, or adversely affect, the historic features of interest listed in the schedules to the CADG for the St Luke’s and Hat and Feathers Conservation Areas.

*Other design considerations*

- 10.62 Part B of policy BC7 in the Finsbury Local Plan states that roof extensions, plant rooms and lift overruns should conform to prevailing building heights. Paragraphs 5.192 and 5.193 of Islington’s Urban Design Guide state that roof structures that are not an integral part of the building such as plant or railings should normally be avoided, particularly if they are visible from the public realm or would undermine residential amenity. If space for plant machinery is required this should be accommodated within the building envelope. Lift overruns that project above the roofline should be avoided. If this is not possible, they should be incorporated on the rear part of the roof, where they are not visible from the street. The previous version of Islington’s Urban Design Guide, which was extant at the time the applicant formulated the current proposals, provided similar guidance.
- 10.63 Paragraph 16.15 of the CADG for the St Luke’s Conservation Area states that the council is opposed to the erection of plant rooms, air conditioning units and other services including water tanks and radio satellite or telecommunications equipment at roof level where this can be seen from street level or public space, including long views from side streets. Paragraph 16.16 adds that the roofline of a street is a major

component of its character, and that the council wishes to stop the proliferation of unsightly rooftop antennae, air-conditioning units and other plant.

- 10.64 In accordance with this policy and guidance, and in response to officer advice, the applicant deleted a rooftop plant enclosure from the proposals during the life of the current application. Plant would be accommodated at basement and ground floor level, however should it transpire that roof-level structures or installations such as plant are required, approval of these would need to be sought pursuant to recommended condition 4. The same recommended condition requires details of the photovoltaic (PV) array, lift overrun, access hatch, riser and automatic opening vent proposed at roof level, to enable a full assessment of the visibility and impact of these installations to be made at conditions stage.
- 10.65 The applicant has also deleted vertical lettering/signage from the rounded east corner of the proposed building. This lettering was considered to be too prominent and too high, and was not compliant with Development Management Policy DM2.6 (which states that advertisements are required to contribute to an attractive environment, must not contribute to clutter or a loss of amenity, and must be of a high quality and sensitive to the surrounding streetscene, especially in conservation areas) and paragraph 16.30 of the Conservation Area Design Guidelines for the St Luke's Conservation Area (which states that signage should be of an appropriate scale and design). No inference of signage in this location is now shown on the elevational drawings in response to officer concerns regarding the very idea of high-level signage at this corner.
- 10.66 The proposed development raises no significant concerns in relation to crime, the fear of crime, and anti-social behaviour. Although natural light reaching the pavement of Crescent Row may be reduced, a tidier site, with a greater number of employees, and a building with large windows serving a ground floor at the same level as the pavement (contrasting with the existing situation, where basement windows line all four sides of the building, and the ground floor is raised), may in fact help reduce the risk of anti-social behaviour around parts of the site. Both responses from the Metropolitan Police's Designing Out Crime Officers raised no in-principle objection to the development. The later concern regarding the number of external doors is noted, however it would not be possible to reduce the number of entrances without diminishing the quality or flexibility of the proposed office floorspace. Other comments from the Designing Out Crime Officers regarding the securing of doors and other security-related details can be addressed by the applicant at detailed design stage.

### **Archaeology**

- 10.67 The application site is within an Archaeological Priority Area. Part F of Development Management Policy DM2.3 states that archaeological remains should be retained in situ, and where this cannot be achieved measures must be taken to mitigate the impact of proposals through archaeological fieldwork to investigate and record remains in advance of works, and subsequent analysis, publication and dissemination of the findings.
- 10.68 The applicant's Historic Environment Assessment (MoLA, October 2016) considers the archaeological potential of the site, indicating that the site's main potential is for

archaeological remains associated with development from the 17<sup>th</sup> century and later. The site is close to the junction of two Roman roads, which could have been a focus for roadside activity, however the submitted assessment concludes that there is no evidence for Roman activity within the vicinity of the site, and Historic England (in comments dated 17/01/2017) have noted that the site was likely to have lain within the hinterland of the Roman city, 550m to the south. The submitted assessment also concludes that, although the existing building includes a basement, based on current evidence it is likely that there would be surviving archaeological remains below the basement floor slab. Any such remains would be completely removed by the proposed deeper basement level.

- 10.69 Historic England have advised that field evaluation will be needed to determine appropriate mitigation, and have advised that – although the NPPF envisages evaluation being undertaken prior to determination – in this case a condition could provide an acceptable safeguard. Recommended condition 18 requires a two-stage process of archaeological investigation comprising an evaluation to clarify the nature and extent of surviving remains, followed (if necessary) by a full investigation. It is also recommended that the informative suggested by Historic England be relayed to the applicant.

### **Inclusive Design**

- 10.70 Paragraph 57 of the NPPF is relevant to the current proposal in relation to inclusive design. London Plan policy 7.2 requires all new development to achieve the highest standards of accessible and inclusive design, and refers to the Mayor's Accessible London SPG. At the local level, Development Management Policy DM2.2 requires all developments to demonstrate that they i) provide for ease of and versatility in use; ii) deliver safe, legible and logical environments; iii) produce places and spaces that are convenient and enjoyable to use for everyone; and iv) bring together the design and management of a development from the outset and over its lifetime. The Inclusive Design in Islington SPD is also relevant.
- 10.71 Lift access would be provided to every floor of the proposed development, and a platform lift is proposed between the basement and ground floors of the two units that would be suitable for occupation by micro or small enterprises.
- 10.72 Accessible WCs are proposed at every floor except ground floor level, and an accessible shower is proposed at sixth floor level. The lack of a ground floor accessible WC, and the sharing of basement WCs by the occupants of both the units suitable for occupation by micro or small enterprises, is not ideal, however given that the ground floor already has to accommodate a cycle store, substation, refuse store, lobby, voids (providing light to the basement), circulation spaces and an internal partition, it is not considered reasonable to require WCs here (and thus a further reduction in usable employment space at ground floor level). It is recommended that details of the accessible WCs be secured by condition (11). These details would need to include large-scale floor plans and door and corridor widths to address the concerns of the council's Inclusive Design Officer.
- 10.73 An accessible shower room is proposed at sixth floor level. While its location is not ideal (an alternative location closer to the cycle store would be preferable), it is again

noted that space at ground and basement level is limited, and it is recommended that the proposed provision be accepted.

- 10.74 Recommended condition 11 also requires the submission of other details relevant to inclusive design, to ensure the proposed office floorspace would comply with relevant planning policies and the relevant parts of the Inclusive Design in Islington SPD, including the requirements and guidance related to evacuation (the refuges proposed within lift lobbies would obstruct access to the firefighting lift, and a single refuge on each floor effectively limits the number of mobility-impaired people permitted on a floor to one, other than at ground floor level), storage of mobility scooters (the space proposed within the stairwell is not acceptable for fire safety reasons), manifestations to glazing, and the opening leaves and weight of entrance doors, all to address the concerns of the council's Inclusive Design Officer.

#### *Accessible parking and drop-off*

- 10.75 No on-site accessible parking is proposed. This is considered acceptable, given the site's constraints and the impact on-site parking would have had upon the design of the proposed development. Applying the standard set out at page 39 of the Planning Obligations (Section 106) SPD (of one accessible parking bay required for the uplift in employee numbers divided by 33), with a likely total uplift of between 35 and 56 employees, two accessible parking spaces would be required. Noting that there may be limited scope for on-street provision close to the application site, recommended condition 12 requires the submission of a survey to ascertain where such spaces could be provided. Should on-street provision not be possible, a financial contribution towards accessible transport initiatives can be accepted.
- 10.76 The same recommended condition requires details of where safe on-street drop-off could be provided for employees and visitors with disabilities.

#### **Neighbour Amenity**

- 10.77 The National Planning Policy Framework identifies as a core planning principle that planning should always seek a high quality of design and a good standard of amenity for all existing and future occupants of land and buildings.
- 10.78 London Plan policy 7.6 (part Bd) states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy and overshadowing. Policy 7.15 (part B) states that development proposals should seek to manage noise by mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development; separating new noise sensitive development from major noise sources through the use of distance, screening or internal layout in preference to sole reliance on sound insulation; controlling and mitigating potential adverse effects through the application of good acoustic design principles; and promoting new technologies and improved practices to reduce noise at source and on the transmission path from source to receiver.
- 10.79 Development Management Policy DM2.1 (part Ax) confirms that, for a development proposal to be acceptable it is required to provide a good level of amenity including consideration of noise and the impact of disturbance, hours of operation, vibration,

pollution, fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook. Paragraph 2.13 states that the design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings, and ensure that adjoining land or properties are protected from unacceptable overshadowing. This supporting text goes on to specifically reference relevant guidance prepared by the Building Research Establishment (BRE).

#### *Daylight and sunlight*

- 10.80 On 14/09/2017 the applicant provided an updated Daylight and Sunlight Report (revision B) which takes into account information regarding room sizes helpfully provided to the applicant (via officers) by neighbouring occupants. It is understood that the applicant team have not visited neighbouring properties to ascertain or verify room sizes, layouts and uses, however neighbouring occupants have helpfully provided floor plans of some of the nearby properties, and these plans have been used in the applicant's updated report. For other properties where internal layouts were not ascertained by the applicant team, assumptions have been made as per the floorplans at Appendix C of the updated Daylight and Sunlight Report. While this means some of the applicant's NSL/DD information relies on unverified information (which might call into question the accuracy of the applicant's results), the applicant team's assumptions (which relate to non-residential properties) are not considered unreasonable, and it is considered that an adequate assessment of the development's impacts upon natural light can be made on the basis of the applicant's updated report.
- 10.81 The updated Daylight and Sunlight Report assesses impacts upon the following neighbouring properties:
- 5 Crescent Row
  - 1-2 Sycamore Street
  - 6-8 Sycamore Street (Dynamis House)
  - 12 Old Street
  - 14-18 Old Street
  - Hatfield House, Baltic Street West
- 10.82 Given the test results set out in the applicant's updated report and considered below, it was not considered necessary to require testing of windows to the five flats at 1-3 Crescent Row (which are further away from the application site than 5 Crescent Row, and which have windows of a similar design). Similarly, given the test results for 14-18 Old Street, the mix of uses of buildings to the northeast and east of the application site, and the orientation of windows in these buildings, it was not considered necessary to require testing of windows to 24-26 Baltic Street West or 10 Crescent Row / 11 Memel Street. Although parts of that latter building accommodate residential units ("The Old Lofts") in its upper storeys, it has a blank, windowless southwest elevation facing the application site.
- 10.83 The applicant's chosen methodology follows guidance provided by the BRE and uses BRE-recommended testing to assess natural light impacts. In relation to daylight, the Vertical Sky Component (VSC) and No Sky Line / Daylight Distribution (NSL / DD) tests have been used. For sunlight, the applicant has carried out Annual Probable

Sunlight Hours (APSH) testing. Sunlight testing for two existing outdoor amenity spaces has also been carried out.

- 10.84 When using the BRE guidance to assist in the assessment of daylight and sunlight impacts, paragraph 1.6 of the BRE guidance must be noted. This confirms that:

*“The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings”.*

- 10.85 Regarding the weight to be attached to the BRE guidance, appeal decisions such as the decision dated 15/01/2014 relating to a major site in the south of the borough at Pentonville Road (ref: APP/V5570/A/13/2195285) generally indicate that closely adhering to BRE guidance is appropriate to ensure neighbour amenity is protected.
- 10.86 Regard must also be had to the scale and spacing of existing development in the area, and it must be noted that the application site at Sycamore Street is a central location in a part of the borough which is characterised by dense development, and where it is reasonable to assume expectations of unusually high levels of amenity would be lower than in less dense, suburban areas.
- 10.87 With regard to daylight, the BRE guidance notes that where VSC figures are greater than 27%, enough daylight should still be reaching the window of the existing building. If the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in daylight. Of note, the 0.8 figure is often expressed as a percentage in VSC analysis, such that a reduction of up to 20% would comply with this part of the BRE guidance if the 27% figure is also met.
- 10.88 In situations where post-development VSC figures fail to comply with the levels suggested by the BRE, a further test can be carried out to measure the overall amount of daylight in a room. This is the Daylight Distribution (No Sky Line, or NSL) test. BRE guidance state that if the NSL moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants, and more of the room will appear poorly lit. The 0.8 figure is often expressed as a percentage in NSL analysis, such that a reduction of up to 20% would be acceptable.
- 10.89 With regard to sunlight, the applicant has used the APSH test to ascertain whether the centre of adjacent windows (facing within 90° of due south) would receive 25% of annual probable sunlight hours, including at least 5% of those hours in the winter months between 21<sup>st</sup> September and 21<sup>st</sup> March. If the available sunlight hours are both less than these amounts and less than 0.8 times their former value, occupants will notice a loss of sunlight.

10.90 In relation to outdoor amenity spaces, at paragraph 3.3.7 of the BRE guidance it is suggested that at least 50% of amenity areas should receive at least two hours of sunlight on 21<sup>st</sup> March, and that a two hours sun contour can be plotted on plans to illustrate a development's impact.

*Property-by-property natural light assessment*

10.91 5 Crescent Row The lower ground (or basement) and ground floor of this property are in commercial/showroom use. For these floors, the applicant predicts VSC failures to two windows but no NSL/DD failures.

10.92 A single flat (flat A) occupies the first floor, and a triplex residential unit occupies the second, third and fourth floors. There is a roof terrace at fourth level at the front of the building. For these residential floors, the applicant's VSC and NSL test results are detailed below:

Floor – window	Room use	Vertical Sky Component			No Sky Line (Daylight Distribution)		
		Existing (%)	Proposed (%)	Factor of former value (target: 0.8)	Existing (%)	Proposed (%)	Factor of former value (target: 0.8)
First – W1	Living/dining/ bedroom	22.49	16.5	<b>0.73</b>	87	87	0.99
First – W2		21.93	15.61	<b>0.71</b>			
First – W3		18.32	12.53	<b>0.68</b>			
First – W6		27.08	24.67	0.91			
First – W7		26.22	23	0.87			
First – W8		6.69	6.69	1			
Second – W1	Living/dining/ kitchen	28.83	21.81	<b>0.75</b>	91	91	1
Second – W2		28.45	21.23	<b>0.74</b>			
Second – W3		26.12	19.94	<b>0.76</b>			
Second – W6		31.76	28.67	0.9			
Second – W7		31.21	27.05	0.86			
Second – W8		11.6	11.6	1			
Third – W1	Bedroom	34.08	27.07	<b>0.79</b>	99	99	0.99
Third – W2		33.97	26.84	<b>0.79</b>			
Third – W3		32.63	26.86	0.82			
Third – W6		35.52	32.28	0.9			
Third – W7		35.25	30.89	0.87			
Fourth – W1	Bedroom	37.42	34.89	0.93	99	99	0.99

10.93 The above results confirm that, although eight (highlighted in bold) of the 18 tested residential windows would fail VSC, seven of these failures are in the 0.7 to 0.79 range. This indicates that reductions in daylight would be noticed, however such reductions of between 20% to 30% are generally considered to be a lesser or minor infringement in dense urban areas such as this. Furthermore, no NSL/DD failures are

predicted. It is therefore considered that daylight impacts to this neighbouring building are acceptable.

- 10.94 In relation to the levels of sunlight reaching the windows of the two residential units at 5 Crescent Row, no failures of the BRE's APSH testing are predicted. The centres of all tested windows (facing within 90° of due south) would receive 25% of annual probable sunlight hours, including at least 5% of those hours in the winter months between 21<sup>st</sup> September and 21<sup>st</sup> March, and difference values would not be below 0.8.
- 10.95 Sunlight to the fourth floor roof terrace at 5 Crescent Row has also been assessed by the applicant. Post-development, 96% of this outdoor space would receive at least two hours of sunlight on 21<sup>st</sup> March, in compliance with BRE guidance.
- 10.96 The three hinged platforms (to what were the taking-in doors at first, second and third floors) at 5 Crescent Row have not been individually assessed by the applicant, as these are not suitable for full use as outdoor amenity spaces.

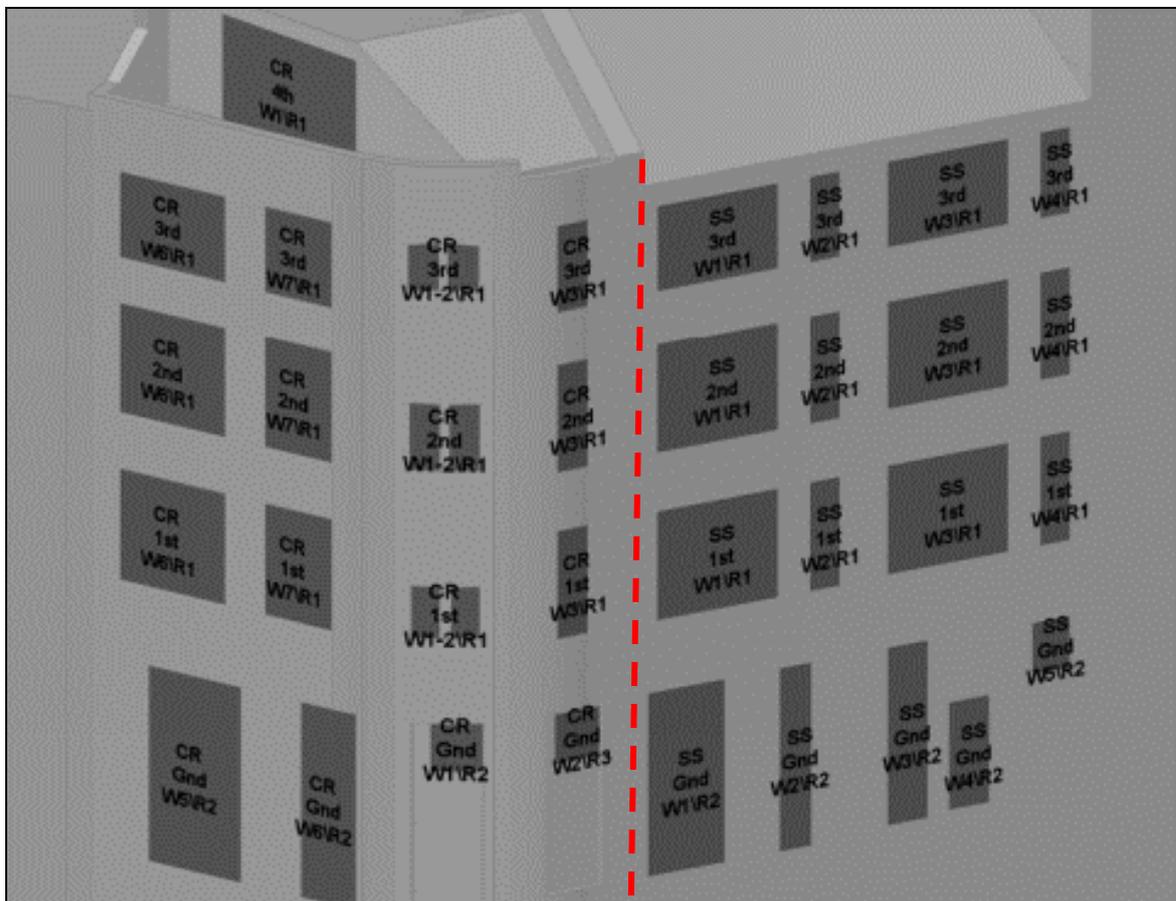


Image 4: Window plan of 5 Crescent Row and 1-2 Sycamore Street



Photographs 9 and 10: 5 Crescent Row and 1-2 Sycamore Street

- 10.97 1-2 Sycamore Street This non-residential building of four storeys (plus lower ground floor) is in office/showroom use, and has windows to Sycamore Street and rear windows. Of the 33 windows tested by the applicant, three would fail VSC, however these failures are in the 0.7 to 0.79 range. NSL/DD failures are also predicted to four of the six rooms tested – one these would achieve a factor of 0.75 of its former value. The second and third floors would pass the VSC and NSL/DD tests. The predicted impacts on the daylight reaching parts of this building are unfortunate and must weigh negatively in the balance of planning considerations relevant to this application, however it is not considered that the losses of daylight to this non-residential property are so significant as to warrant refusal of planning permission. In relation to sunlight, no failures of the BRE's APSH testing are predicted.
- 10.98 Dynamis House (6-8 Sycamore Street) This four-storey non-residential property is located to the north of the application site, and has windows to Sycamore Street and Crescent Row. The building also has a roof terrace. The applicant predicts VSC failures to 16 of the 32 tested windows, including value differences as low as 0.24 and 0.25 at ground and first floor level, however no NSL/DD failures are predicted. It is therefore considered that daylight impacts to this neighbouring building are acceptable.
- 10.99 In relation to sunlight, 14 of the 32 tested windows are predicted to fail APSH, of which four would fail in winter. Given that sunlight is not considered essential to the use of non-residential accommodation, these identified impacts are not considered so significant as to warrant refusal of planning permission.

- 10.100 Sunlight to the roof terrace of Dynamis House has also been assessed by the applicant. Post-development, 57% of this outdoor space would receive at least two hours of sunlight on 21<sup>st</sup> March, in compliance with BRE guidance.
- 10.101 12 Old Street The six-storey rear elevation of this non-residential property is also to the north of the application site. The applicant predicts VSC failures to 12 of its 14 rear windows, including value differences as low as 0.25 and 0.27 at first and second floors, and five of the nine tested rooms would fail NSL/DD, with value differences ranging from 0.23 to 0.72. The predicted impacts on the daylight reaching the rear elevation of this building are unfortunate and must weigh negatively in the balance of planning considerations relevant to this application, however it is not considered that the losses of daylight to this non-residential property are so significant as to warrant refusal of planning permission, especially given the appropriate massing of the proposed development and the loss of the existing building's stepped and sloped massing. Although this existing massing is beneficial in terms of allowing natural light to reach neighbouring properties, as noted earlier in this report it is an incongruous feature in the townscape.
- 10.102 As with Dynamis House, failures are predicted in relation to APSH (eight windows would fail the annual test, and seven would fail in winter), however these identified impacts are not considered so significant as to warrant refusal of planning permission.
- 10.103 14-18 Old Street Eight of the 15 tested windows in the rear elevation of this non-residential property are predicted to fail VSC, although seven of these failing windows would be in the 0.7 to 0.79 range, and no NSL/DD failures are predicted. It is therefore considered that daylight impacts to this neighbouring building are acceptable.
- 10.104 As with Dynamis House and 12 Old Street, failures are predicted in relation to APSH (eight windows would fail the annual test, and nine would fail in winter), however these identified impacts are not considered so significant as to warrant refusal of planning permission.
- 10.105 Hatfield House, Baltic Street West Of the 70 windows tested at Hatfield House (to the south of the application site, in the City of London), 29 were predicted by the applicant to fail the VSC test, post development, however 15 of these failures would be in the 0.7 to 0.79 range. Furthermore, the applicant has indicated that some of these windows are likely to serve non-habitable spaces, and has predicted no NSL/DD failures at Hatfield House. It is therefore considered that daylight impacts to this neighbouring building are acceptable. No sunlight assessment needed to be carried out for Hatfield House, as no windows facing the application site face within 90° of due south.
- 10.106 Sunlight at street level to the north of the application site is already limited, however some direct sunlight is likely to reach the road surfaces of Crescent Row and Memel Court in summer. The proposed development may result in some losses of this light, however this is considered unlikely to be so significant as to warrant refusal of permission.

### *Daylight and sunlight summary*

- 10.107 According to the applicant's testing, it is noted that where VSC failures are predicted to windows of neighbouring residential properties, the affected rooms would not fail NSL/DD testing, and the impacts upon these properties in relation to daylight is therefore considered acceptable. No infringements against the BRE's sunlight guidance are predicted for these residential properties. Neighbouring residential properties would retain good levels of amenity in relation to natural light.
- 10.108 For most of the non-residential adjacent buildings, levels of daylight would remain acceptable, or the predicted infringements against BRE daylight guidance would be minor. At 1-2 Sycamore Street and 12 Old Street the predicted losses of daylight are unfortunate, but are not considered so significant as to warrant refusal of planning permission. Levels of sunlight reaching the non-residential adjacent buildings (in the case of the windows of 1-2 Sycamore Street and the roof terrace of Dynamis House) are acceptable, or the predicted losses (to the windows of Dynamis House, 12 Old Street and 14-18 Old Street) are not considered so significant as to warrant refusal of planning permission.
- 10.109 It is again noted that the application site is located in a densely-developed part of the borough where some failures against BRE guidance can be accepted. Overall, it is recommended that the predicted impacts upon natural light be accepted.
- 10.110 Rights to Light are a private legal matter, and are not a material planning consideration.

### *Outlook*

- 10.111 Outlook – the visual amenity provided by the immediate surroundings of a (usually residential) property, as experienced from its windows or outdoor spaces – can be affected by the close siting of another building or structure, which – depending on its proximity, size and appearance – can create an oppressive, increased sense of enclosure to the detriment of the amenities of rooms in a neighbouring property, particularly those of single aspect dwellings, or those that already have limited outlook. Outlook does not refer to views of a particular landmark or feature of interest, or long views over land not in the ownership of the viewer.
- 10.112 Although the proposed development would maintain the existing footprint and building lines, it would have greater height and massing than the existing building it would replace. This increased height and massing, the narrowness of Crescent Row, and the close proximity of neighbouring building, means the development has the potential to adversely affect outlook. Of particular note, the west corner of the proposed development would stand a little over 7m away from the front corner of 5 Crescent Row, and as noted earlier in this report, elevation-to-elevation distances across Crescent Row would be a little over 4m.
- 10.113 Other considerations, however, must also inform any assessment of outlook impacts. In particular, it is noted that the two residential units at 5 Crescent Row have southerly (towards the abovementioned sycamore tree and undeveloped space) and rear outlook in addition to the close views of the application site, and these properties would retain

a good level of amenity in terms of outlook, despite the upper floors of the proposed development coming closer than the existing building.

- 10.114 Most other properties to the north and east of the application site are not in residential use, and also benefit from dual aspect. The proposed development would have a series of setbacks from fourth floor upwards. It is also noted that, in this relatively densely-developed part of the borough, the proposed height and massing would not be unusual – regard must again be had to the three- and five-storey elevations which already stand less than 5m apart along much of Crescent Row. Given these considerations and context, it is considered that the impact of the proposed development upon outlook from buildings to the north and east – while harmful to an extent, and significant enough to weigh negatively in the balance of planning considerations – would not be so great as to warrant refusal of planning permission. The amenities of such non-residential uses are not normally afforded the same level of protection as that appropriate to residential properties.
- 10.115 The residential windows at 10 Crescent Row / 11 Memel Street (“The Old Lofts”) do not face the application site.
- 10.116 To the south of the application site, it is considered that the width of Baltic Street West, and the additional space provided by the wide pavement and vehicular ramp, would ensure that outlook from Hatfield House would not be significantly adversely affected.
- 10.117 In summary, the proposed development would not be overbearing or lead to an unacceptable sense of enclosure for neighbouring occupiers, except – to an extent – in relation to non-residential properties to the north, where the impacts identified above must weigh negatively in the balance of planning considerations.

#### *Privacy*

- 10.118 Paragraph 2.14 of Islington’s Development Management Policies states that “To protect privacy for residential development and existing residential properties, there should be a minimum distance of 18m between windows of habitable rooms. This does not apply across the public highway – overlooking across a public highway does not constitute an unacceptable loss of privacy”. In the application of this policy, consideration must be given to the nature of views between habitable rooms – for instance, where views between habitable rooms would be oblique as a result of angles or height differences between windows, there may be no harm.
- 10.119 Paragraph 2.3.36 of the Mayor of London’s Housing SPG states that such minimum distances “can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density”. This is noted, and there have indeed been instances where window-to-window distances of less than 18m have been accepted where exceptional circumstances apply, however the Mayor’s guidance does not override Islington’s Development Management Policies, and there remains a need to ensure that proposed developments maintain adequate levels of privacy for neighbouring residents.

- 10.120 The proposed development includes no residential accommodation or habitable rooms, therefore the 18m requirement does not necessarily apply. Nevertheless, there is potential for office windows to adversely affect the privacy of neighbouring residential properties.
- 10.121 The site's existing building currently protects the amenities of the two residential units at 5 Crescent Row to an extent, as it has no windows on the upper floors of its west corner, and windows to its Sycamore Street and Crescent Row elevations do not directly face the residential windows opposite. The proposed development would introduce floor-to-ceiling windows to that west corner at ground to third floors. From fourth floor upwards, new windows would not directly face the residential windows opposite, and/or would be positioned away from the edge of the building, however oblique views out of these windows would be possible. This new fenestration would certainly introduce opportunities for overlooking from the new offices into the windows of the two residential units opposite, and this must weigh negatively in the balance of planning considerations, however the weight to be attached to this impact would be limited by the likely hours that the proposed office floorspace would be used (although it is noted that these hours would not be controlled), and the fact that this overlooking would occur across a public highway (paragraph 2.14 of Islington's Development Management Policies is again noted). It is not considered that the impact of the proposed development upon the privacy enjoyed by the occupants of 5 Crescent Row would be so great as to warrant refusal of planning permission.
- 10.122 Other properties to the north and east of the application site are mostly in non-residential use, and overlooking from the proposed development is not considered problematic in relation to these uses. These buildings, in any case, stand opposite the site on the other side of a public highway. It is again noted that the residential windows at 10 Crescent Row / 11 Memel Street ("The Old Lofts") do not face the application site.
- 10.123 To the south of the application site, Hatfield House stands over 19m away from the application site, on the other side of a public highway.
- 10.124 Roof terraces are proposed on the Sycamore Street side of the new building at fifth and sixth floor levels, albeit not across the full width of this elevation. These terraces would not be screened or enclosed, other than with clear glass balustrades. At its nearest point, the fifth floor roof terrace would be nine metres away from the corner (and residential windows and roof terrace) of 5 Crescent Row. The proposed roof terraces would certainly introduce opportunities for overlooking and losses of privacy to neighbouring residents, however given that a large roof terrace already exists at 6-8 Sycamore Street, and given recommended condition 10 (which restricts the use of the roof terraces to the same weekday hours as those considered appropriate for the Farmiloe site on St John Street), it is considered that the neighbouring amenity impacts would be limited, and that the proposed roof terraces are acceptable. Recommended condition 16 restricts the use of the green roofs of the proposed development as outdoor amenity spaces for staff.

### *Light pollution*

- 10.125 Normal office hours are unlikely to require internal lighting of the proposed development late into the evenings, however – to enable flexible use of the proposed office floorspace – it is not recommended that the hours of occupation of the development be restricted. This raises the possibility of late night light pollution occurring, should office staff need to work outside normal office hours. To address this, measures such as the use of daylight and occupancy sensors for the development's internal lighting, and blinds, can be used. Condition 9 requires the submission of details of such measures to address potential light pollution concerns.
- 10.126 Neighbouring residents have expressed concern regarding light pollution during construction (a matter that can be addressed through construction management and recommended condition 23), but not in relation to the proposed development once completed and occupied.

### *Noise*

- 10.127 The application site is located in an area subject to traffic noise. The area has a mix of commercial and residential uses located in close proximity to one another.
- 10.128 Although the proposed development would intensify the use of the site, the proposed development is not considered inappropriate in terms of the additional activity that would be introduced to the street and area, and the continued office use of the site is considered appropriate, given the limited noise outbreak normally associated with such uses. Recommended condition 10 would limit noise nuisance related to the use of the proposed roof terraces.
- 10.129 To address potential noise caused by any rooftop plant that may be proposed in the future in relatively close proximity to residential uses, conditions are recommended in accordance with the advice of the council's Pollution Team. These conditions (26 and 27) relates to the provision of appropriate noise control measures, to ensure that plant would not lead to unacceptable disturbance to neighbouring occupiers.

### *Other environmental impacts*

- 10.130 It is acknowledged that – due to the constraints of the site, the narrowness and likely acoustics of Crescent Row, and the proximity of residential properties – there is certainly potential for demolition and construction works to significantly impact upon the amenities of neighbouring occupants.
- 10.131 To address potential disturbance and environmental impacts during construction, a condition (condition 23) is recommended requiring the submission, approval and implementation of a Construction Environmental Management Plan (CEMP) to address noise, dust, light pollution and other potential environmental impacts. The CEMP will also need to account for potential cumulative impacts, should any planning permissions for developments at nearby sites be implemented or progressed at the same time.

10.132 The Section 106 agreement referred to in Appendix A would ensure that construction is carried out in compliance with the Code of Construction Practice. The Code of Construction Practice normally restricts noisy works to between 08:00 and 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays to ensure amenity impacts are limited. Outside planning control there are further controls applicable to construction, including Environmental Health legislation and regulations that would further protect the amenities of neighbouring occupiers during the construction period.

#### *Neighbour amenity summary*

10.133 The cumulative impacts caused by the proposed development must also be considered. Where a neighbouring property is predicted to lose natural light, that impact may be compounded or more acutely felt if the same property would also lose (or has limited) outlook, for example.

10.134 Regard must also be had, however, to the application site's central, dense location, where it is reasonable to assume expectations of unusually high levels of amenity would be lower than in less dense, suburban areas. In this context, and given the need to ensure efficient and optimised use of accessible sites, it is considered that some infringements of standards and requirements set out in relevant planning policies and guidance could be accepted. This reduces the weight to be attached to the proposed development's adverse impacts identified above.

10.135 Given the above assessment, while it is noted that the proposed development would cause some adverse impacts that must weigh negatively in the balance of planning considerations, it is not considered that they – either individually or cumulatively – are so significant as to warrant refusal of permission on neighbour amenity grounds. Overall, a good level of neighbouring residential amenity would be maintained by the proposed development. On the basis of this assessment, refusal of permission is not recommended on amenity grounds, however conditions and Section 106 clauses will need to be applied to protect amenity during both the development's demolition/construction and operational phases.

#### **Financial Viability**

10.136 Paragraph 173 of the NPPF states that the sites and the scale of development identified in development plans should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

10.137 Planning Practice Guidance states that local authorities should ensure that the combined total impact of conditions, CIL and planning obligations does not threaten the viability of the sites and scale of development identified in the development plan (paragraph: 002, reference ID: 23b-002-20140306). The "Viability" chapter of the Planning Practice Guidance is also relevant to the matter of financial viability and decision-taking, as is the council's Development Viability SPD, which recognises the

fact that financial viability has become an important consideration in the determination of planning applications.

- 10.138 The applicant submitted an Economic Viability Appraisal Report (ULL Property, December 2016) which concluded that the proposed development would achieve a deficit of £571,230 (albeit a profit would still be made), and would therefore be unviable. According to the applicant, this would in turn mean that the development could not sustain the Section 106 contributions required by the council, which at the time included a financial contribution towards affordable workspace, as the applicant did not intend to address that requirement with an on-site provision of units that would be suitable for occupation by micro or small enterprises by virtue of their size.
- 10.139 The council's financial viability consultant, BPS, undertook a review of the applicant's financial viability information, and carried out their own assessments of the development's viability. In their report of 02/02/2017, BPS suggested reasonable adjustments to some of the inputs used by the applicant, and suggested changes to the applicant's assessment of the site's benchmark land value and the valuation of the proposed development. With these changes, BPS reported that a surplus of £0.42m would be achieved, from which the required Section 106 contributions could be paid.
- 10.140 Communication between the applicant's consultant and BPS as well as officers has continued, however agreement on financial viability matters has not been reached. The applicant maintains that the proposed development would not be viable or deliverable, and that the full complement of Section 106 contributions cannot be paid. The applicant, in a letter dated 15/08/2017, argued that the development would achieve insufficient profit, and that only £103,545 of CIL and Section 106 contributions could be agreed to at this stage. For the other contributions sought by the council, the applicant suggested a trigger be agreed, securing their payment should a viability review find that the development has become more profitable. If, however, no review was carried out, or if the review found that the development was no more profitable than previously ascertained, those deferred contributions would not be paid, yet the development could still go ahead.
- 10.141 The latest appraisal carried out by BPS included updated figures for CIL and Section 106 contributions, and concluded that the development's deficit would be £419,438, although a profit of 15% on GDV and 19.18% on cost would still be achieved. Having regard to the NPPF and Planning Practice Guidance, officers are of the view that this deficit is not so significant as to warrant a deferral (and possible non-payment) of essential Section 106 contributions. It is considered reasonable to assume that – if the applicant were to accept a relatively small reduction in profit (below that normally considered acceptable to incentivise development) – implementation could still happen. Furthermore, the ongoing and anticipated increases in office rents (which are likely to be boosted by the opening of Crossrail next year) are likely to improve the development's viability. The scale, number and quality of recent office developments in the area would suggest that confidence in this sector (and its future performance) remains sufficiently high. It must also be noted that the applicant has the opportunity to reduce and even eliminate some Section 106 contributions, for example by improving the energy efficiency and performance of the development which would reduce the required carbon offsetting contribution.

- 10.142 Officers' position is further supported by recent advice provided by colleagues in the council's Development Viability team, who have advised that, in their view, including a 15% premium when calculating a benchmark land value for the site would be inappropriate in this case (indeed, this premium was not included in the applicant's initial appraisal). Without the 15% premium that BPS included in their calculation, a lower benchmark value is arrived at, and the development would in fact achieve a surplus of £768,608. Officers therefore consider that the proposed development is in fact viable and deliverable, including in a scenario where all CIL and Section 106 contributions are paid (and not deferred).
- 10.143 Given the above assessment, it is not considered that further information or assurance from the applicant regarding the deliverability of the proposed development is necessary. It is also not considered necessary to include a viability review mechanism in any Section 106 agreement, should permission be granted.

### **Sustainability, Energy Efficiency and Renewable Energy**

- 10.144 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, and policies relevant to sustainability are set out throughout the NPPF.
- 10.145 Further planning policies relevant to sustainability are set out in chapter 5 of the London Plan, Core Strategy policy CS10 and chapter 7 of the Development Management Policies. Islington's Environmental Design SPD is also relevant.
- 10.146 The council requires all developments to meet the highest standards of sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change. Developments must demonstrate that they achieve a significant and measurable reduction in carbon dioxide emissions, following the London Plan energy hierarchy. All developments will be expected to demonstrate that energy efficiency has been maximised and that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions. Carbon dioxide calculations must include unregulated, as well as regulated, emissions, in accordance with Islington's policies.
- 10.147 Islington's Core Strategy policy CS10 (part A) states that all major development should achieve an on-site reduction in total (regulated and unregulated) carbon dioxide emissions of at least 40% in comparison with total emissions from a building which complies with the Building Regulations 2006, unless it can be demonstrated that such provision is not feasible. This 40% saving is equivalent to a 30% saving compared with the 2010 Building Regulations, and 27% compared with the 2013 Building Regulations. A higher saving (50% in comparison with total emissions from a building which complies with the Building Regulations 2006, which translates into a 39% saving compared with the 2013 Building Regulations) is required of major development in areas where connection to a decentralised energy network (DEN) is possible. Development Management Policy DM7.3 requires all major developments to be designed to be able to connect to a DEN, and connection is required if a major development site is within 500m of an existing or a planned future DEN.
- 10.148 The Core Strategy also requires developments to address a number of other sustainability criteria such as climate change adaptation, sustainable transport,

sustainable construction and the enhancement of biodiversity. Development Management Policy DM7.1 requires development proposals to integrate best practice sustainable design standards and states that the council will support the development of renewable energy technologies, subject to meeting wider policy requirements. Details are provided within Islington's Environmental Design SPD, which is underpinned by the Mayor's Sustainable Design and Construction Statement SPG. Major developments are also required to comply with Islington's Code of Practice for Construction Sites and to achieve relevant water efficiency targets as set out in the BREEAM standards.

#### *Carbon dioxide emissions*

- 10.149 The applicant has submitted an Energy Strategy and a Sustainable Design and Construction Statement. These set out the applicant's proposed measures which would achieve a reduction in regulated carbon dioxide emissions of 52.4% against the 2013 Building Regulations. This complies with the relevant 35% London Plan target.
- 10.150 In relation to total (regulated and unregulated) emissions, however, the applicant initially proposed a saving of only 24.5% against the 2013 Building Regulations. This has been increased during the life of the planning application to 26% through airtightness improvements. These amendments were made in response to officers' requests for further exploration as to whether the proposed development could be brought closer to policy compliance. The 26% saving now proposed still falls short of the 27% saving required by Islington's policies (note that the 27% requirement, rather than the 39% requirement, is applicable as it is accepted that the development cannot currently connect to a DEN). Although officers accept some of the arguments advanced by the applicant as to why certain carbon dioxide-saving measures are not possible at this site, there still appears to be potential for further improvements in some areas. A larger photovoltaic (PV) array, for example, may be possible, given the large areas of roof (on drawing 434-PA.09 rev P7) that would not be occupied by installations. The applicant's assertions that PV has been maximised, and that the remaining roof area has been allocated for plant, is not accepted – ample space remains available for additional PV, access, and rooftop plant (should any such installations be approved in the future pursuant to condition 4, bearing in mind none are currently shown on the roof plan). Recommended condition 21 requires the submission of details of such (or other) measures to ensure the required 27% saving is achieved.
- 10.151 Remaining carbon dioxide emissions would need to be offset with a payment of £62,560. It is recommended that this be included in a Section 106 agreement associated with any permission granted for the proposed development.
- 10.152 The Bunhill decentralised energy network (DEN) currently extends to within 100m (as the crow flies) of the application site, and serves buildings less than 45m away on the north side of Old Street. The applicant has therefore been advised (albeit not in the council's pre-application advice letter of 14/04/2016) that connection to the Bunhill DEN or the Citigen DEN would be required. The feasibility of such a connection has been explored by the applicant. The Bunhill DEN team have advised that it is currently not feasible to extend the network across Old Street for a development of this size, and E.ON have advised that there are no works in progress to extend their network towards

Old Street. There are, however, plans to apply for funding to support an extension to connect the two networks and open up opportunities for additional connections in the area. Given the possibility that a future connection may become more feasible if funding is secured for network expansion, given that the council's forthcoming decision regarding the development of the former Richard Cloudesley School site (application ref: P2017/2961/FUL) may have implications for the feasibility of connection, and given that the applicant – if permission for the current proposal is granted – may not implement immediately or until the impacts of Crossrail upon office rents become clearer, it is recommended that the relevant Section 106 clauses be worded to require a review of the feasibility of connection prior to implementation.

- 10.153 Should, upon review, it be demonstrated that connection to a DEN is still not feasible, the applicant would be required to explore the potential for a Shared Heating Network (SHN) linking nearby developments and/or existing buildings, as set out in part D of Development Management Policy DM7.3. The applicant has already provided a partial response to this policy requirement, stating that no developments in the surrounding area are of a suitable size for the establishment of a SHN, and that the site has “poor access” which would make connection difficult. The applicant's assertion regarding access is unfounded. As regards other suitable nearby developments, it is recommended that the potential for an SHN be kept under review via appropriately-worded Section 106 clauses, not least given that the council's forthcoming decision regarding the development of the former Richard Cloudesley School site (application ref: P2017/2961/FUL) may have implications for feasibility.
- 10.154 Whatever the final outcome regarding DEN and SHN connections, as a minimum it is recommended that future-proofing of the proposed development for future connection to the DEN be addressed and secured via the necessary Section 106 agreement. The applicant has confirmed that sufficient space is available within the proposed development for the heat exchange plates and pipework required for future connection.
- 10.155 London Plan policy 5.6 requires applicants to explore the potential for on-site combined heat and power (CHP) facilities serving major developments, however at this site no such facility is proposed. The applicant has demonstrated that the proposed air source heat pumps would be more efficient than on-site CHP or a highly-efficient gas boiler. The council's Energy Conservation Officer has accepted that the proposed development's heat loads demonstrate that an on-site CHP system would not be feasible.
- 10.156 The findings of the applicant's submitted Thermal Comfort Report (appended to the Energy Strategy) are accepted. This report states that, after passive measures were included in modelling, the proposed development would still require mechanical (active) cooling. This is proposed in form of air source heat pumps. While the use of active cooling is not usually supported unless evidence is provided to demonstrate that technologies from the higher levels of the London Plan cooling hierarchy cannot deliver sufficient heat control, in this case the applicant's evidence is convincing. The council's Energy Conservation Officer has accepted that there would be a residual risk of overheating that necessitates active cooling.

### *Sustainability*

- 10.157 Section 4.01 of the applicant's Design, Heritage and Planning Statement briefly considers the sustainability implications of refurbishment of the site's existing building, as opposed to demolition and redevelopment. In the applicant's commentary, the poor insulation and energy performance of the existing building is noted. Officers note the potential for a replacement building to significantly improve energy, resource and water efficiency at this site, and – provided adequate, policy-compliant commitments are secured by conditions and a Section 106 agreement – sustainability considerations would not make refurbishment more acceptable in planning terms than demolition and redevelopment.
- 10.158 The applicant's Energy Strategy and Sustainable Design and Construction Statement confirm that the proposed development would achieve BREEAM "Excellent", and a condition (20) securing this is recommended. The applicant's submission detail various other measures in relation to sustainability and relevant planning policies, including a green roof and measures relating to water efficiency. The applicant has also highlighted the adaptable open plan of the proposed development.
- 10.159 A Green Performance Plan (GPP) has been submitted with the application. This is considered to be acceptable as a draft, however a full, updated GPP would need to be secured via a Section 106 agreement, given that the applicant has improved the proposed development's total carbon dioxide emissions since the document was written.
- 10.160 Regarding the use of sustainable materials, condition 3 is recommended to secure the submission and approval of a Green Procurement Plan.
- 10.161 It is recommended that the applicant be required (via a Section 106 agreement) to sign up to Islington's Code of Construction Practice.

### *Trees, landscaping and biodiversity*

- 10.162 The application site has no trees. There are trees within the grounds of the Golden Lane Estate. There is also a single, large sycamore tree immediately to the southwest of the site, in an island surrounded by highways and motorcycle parking spaces. Islington's DRP suggested that this tree and outdoor space be incorporated into the proposals and relandscaped, however officers understand that this area is not within the ownership of the applicant, and the removal of motorcycle parking spaces would necessitate wider public consultation beyond that carried out in relation to this planning application.
- 10.163 The suggestions of the DRP are nonetheless noted, as is the applicant's suggestion that the stretch of Sycamore Street immediately outside the application site be stopped up, landscaped and added to the adjacent open space. Paragraph 16.21 of the Conservation Area Design Guidelines for the St Luke's Conservation Area states that the council will seek to bring about a general improvement to the quality of streets and public spaces within the area, and paragraph 16.24 states that the area's bitmac paving should be replaced with slab paving. Finsbury Local Plan policy BC7 states that the special character of this part of London will be enhanced with public realm improvements. This policy and guidance, and the DRP's and applicant's suggestions,

could inform future decisions as to where CIL moneys associated with the proposed development could be spent.

- 10.164 The applicant's Biodiversity Report states that the site currently has a low ecological value. Officers agree that redevelopment of the site would have little or no impact on existing biodiversity, but provides an opportunity to increase the site's currently-limited biodiversity interest. Measures to achieve this, including through the installation of log piles for invertebrates, and bird and bat boxes, are secured by recommended condition 15.
- 10.165 A green roof is proposed. A condition (16) is recommended, requiring the maximisation of green roof provision (including beneath the proposed PV array, given that PV can be installed above green roofs), and requiring the green roofs to meet the council's standard requirements as set out in Islington's Environmental Design SPD. There is otherwise little scope for significant soft landscaping as part of the proposed development.

#### *Drainage*

- 10.166 Development Management Policy DM6.6 requires major developments to incorporate Sustainable Urban Drainage Systems (SUDS) and to be designed to reduce flow to a "greenfield rate" of run-off (8 litres/second/hectare) where feasible. Where it is demonstrated that a greenfield run-off rate is not feasible, rates should be minimised as far as possible, and the maximum permitted run-off rate will be 50 litres/second/hectare (l/s/ha).
- 10.167 The submitted Report on Structural and Drainage Strategy states at paragraph 4.3 that rainwater run-off from the existing building is 4.98 litres per second, which – for a site of 0.0325 – is equivalent to 153l/s/ha. The applicant proposes to improve this run-off rate to 2.5l/s (equivalent to 77l/s/ha) through the provision of a green roof and a below-basement attenuation tank 11.24 cubic metres in size. This reduction would exceed both the target greenfield run-off rate and the upper limit (50l/s/ha) of Development Management Policy DM6.6. Although it is appreciated that the proposed development would reduce the extent of the site covered by impermeable surfaces, and that the proposed green roof would certainly improve the site's existing (and very poor) run-off rate, the proposal is not policy-compliant. The use of blue roofs appears not to have been explored by the applicant, and while it is appreciated that it may prove difficult to introduce such measures to the development without increasing the height of the building or reducing floor-to-ceiling heights, all potential options for further improvements to the site's run-off rate must be exhausted, and recommended condition 17 requires the submission of further information relating to drainage.

#### **Highways and Transportation**

- 10.168 Policies relevant to highways and transportation are set out in section 4 of the NPPF and chapter 6 of the London Plan. Islington's Core Strategy policy CS10 encourages sustainable transport choices through new development by maximising opportunities for walking, cycling and public transport use. Detailed transport policies are set out in chapter 8 of Islington's Development Management Policies.

### *Existing conditions*

- 10.169 Although the borough boundary runs along Baltic Street West, all parts of the highway are maintained by LB Islington, as are the other streets that surround the application site. Pavements widths vary around the application site.
- 10.170 Double yellow lines also surround the site, however there are permit holders' / pay-by-phone parking spaces directly outside the site on Sycamore Street and Baltic Street West, and there are disabled, permit holder's and pay-at-machine parking spaces opposite the site along the south kerb of Baltic Street West. There are no on-site parking spaces for vehicles. The site is within a Controlled Parking Zone. Solo motorcycle parking spaces are available to the southwest of the site, on the other side of Sycamore Street. The applicant has indicated that there is currently no provision for cycle parking on site.
- 10.171 The site has a Public Transport Accessibility Level (PTAL) of 6a/6b. There are bus stops nearby on Old Street and Goswell Road. The nearest tube station is Barbican, and Old Street and Farringdon stations are within walking distance. Cycle lanes have been marked along stretches of Old Street and Clerkenwell Road. Cyclists can move east-west along Baltic Street West and Baltic Street East, passing between the bollards to the east of the application site that restrict vehicle movements.
- 10.172 The site's existing building is currently serviced from the street (Memel Court). A dropped kerb exists close to the corner of Baltic Street West and Memel Court.

### *Trip generation, parking and cycle parking*

- 10.173 The applicant has submitted a Transport Statement which details the transportation and highways implications of the proposed development.
- 10.174 No data for the trips generated by the site's existing building is available (or has been gathered by the applicant), therefore the applicant has relied on data relating to comparable sites for both the existing situation and predicted trips associated with the proposed development. Total (a.m. and p.m.) peak hour car trips are predicted by the applicant to increase by four, public transport trips would increase by 22, cycle trips would increase by one, and walking trips would increase by four. The applicant asserts that these increases would be modest, and notes that most of the additional trips would be made using sustainable modes of transport. Officers agree with these assertions, and it is considered that the proposed development would have little, if any, additional adverse impact on local highways and public transport.
- 10.175 The proposed development would be car-free in accordance with Core Strategy policy CS10 and Development Management Policy DM8.5. No existing parking spaces would be lost. Accessible parking is discussed earlier in this report.
- 10.176 The applicant proposes a store at ground floor level (accessible directly from Memel Court, and internally) providing 30 cycle parking and one accessible parking space. Lockers and two shower rooms are proposed at basement level. The store would be covered, secure and sufficiently convenient to use. The proposed shower and changing facilities are considered acceptable, and the facilities proposed for employees with disabilities are discussed earlier in this report. In accordance with the

standards set out at Appendix 6 of the Development Management Policies, for 2,337sqm (GIA) of B1 office floorspace, 30 cycle parking spaces are indeed required, however two accessible cycle parking spaces are additionally required. This shortfall can be addressed via recommended condition 13, which also secures the overall provision of the cycle store and facilities.

- 10.177 The applicant has submitted a Travel Plan which – if implemented – would encourage the use of more sustainable modes of transport. It is recommended that a requirement for a detailed, updated travel plan be included in a Section 106 agreement associated with any permission granted for the proposed development.

#### *Other highways considerations*

- 10.178 It is likely that footway and highway reinstatement works would be necessary following completion of the proposed development. This matter is referred to in the recommended Section 106 Heads of Terms.
- 10.179 The applicant has not submitted a Pedestrian Environment Review System (PERS), but has indicated that the conditions of pedestrian routes surrounding and adjacent to the site are generally good, have dropped kerbs for pedestrians at junctions, tactile paving to assist pedestrians with disabilities, and an appropriate provision of street lighting. CIL moneys associated with the proposed development could be spent on improvements to pedestrian routes to and from the development, should any deficiencies be identified at a later date or following a more thorough assessment.
- 10.180 It is recommended that an updated Demolition and Construction Management and Logistics Plan (DCMLP) be secured by condition (22). This would additionally need to account for potential cumulative impacts and logistics implications, should any planning permissions for developments at nearby sites be implemented or progressed at the same time. The City of London Corporation would need to be consulted on this updated plan.

#### **Servicing**

- 10.181 The applicant's Delivery and Servicing Management Plan (DSMP) and Transport Statement note that the site's existing building has no specific storage facility for refuse, and refuse sacks are left on the street for daily collection. It appears that the 2013 permission for the creation of a new bin store (accessed from Memel Court) has not been implemented. The redevelopment of the site provides an opportunity to secure adequate refuse storage arrangements for the site.
- 10.182 The applicant estimates that the proposed development would generate five or six delivery trips per day (carried out predominantly by light vans) in addition to refuse collections. The applicant has suggested that – with a dedicated refuse store now proposed – less frequent refuse collections would be required. At paragraph 3.3 of the submitted DSMP the applicant states that servicing would only be carried out on weekdays between the hours of 08:00 and 18:00, and not at weekends or bank holidays.
- 10.183 Servicing would continue to be carried out from Memel Court. This is considered acceptable in highways and amenity terms, given the low levels of vehicular traffic to

this street, the non-residential use of 24-26 Baltic Street West, and the blank, windowless southwest elevation of 10 Crescent Row / 11 Memel Street. Although Development Management Policy DM8.6 and supporting paragraph 8.40 set out a preference for on-site servicing of major developments, in this case it is accepted that such a provision would render the proposed development unacceptable in townscape and land use terms.

- 10.184 At pre-application stage officers suggested that there was potential for on-street servicing to conflict with wider strategic proposals in the Old Street area, including the proposed Central London Cycle Grid Network that includes Old Street. However, given that the application site is located a block away from Old Street, and would not be serviced directly from Old Street, such conflicts are considered unlikely.
- 10.185 It is recommended that the commitments set out in the submitted DSMP be secured by condition (24).
- 10.186 The submitted ground floor plan (434-PA.02 rev P7) shows a single refuse store at the north corner of the new building, accessed from Memel Court. The store would be 15.2sqm in size, and would accommodate containers providing a total storage capacity of 6 cubic metres (the “770 litres” annotations to the four containers shown on the floor plan are assumed to be indicative or erroneous, as this would total only 3.08 cubic metres, which contradicts the commitments made in the submitted DSMP). For an office development of 2,337sqm (GIA), the proposed 6 cubic metre provision is considered adequate and sufficiently compliant with the council’s current Recycling and Refuse Storage Requirements (June 2013). The refuse store would be located at ground floor level and would be adequately sized to ensure that waste need not be stored outside on the pavement, and dragging distances would be minimal. Recommended condition 25 requires the provision of the refuse store prior to first occupation, and requires 50% of the proposed capacity to be retained for the storage of separated waste for recycling.

### **Fire Safety**

- 10.187 Part B of the London Plan policy 7.13 states that development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire. Although matters relating to fire safety are relevant to the Building Regulations, certain fire safety measures may have implications relevant to planning.
- 10.188 Officers raised queries regarding means of escape (an alternative means of escape is required for every storey above 11m), the required separation of the single staircase between basement and ground level (the main staircase should not extend down to basement level), and the extent of unprotected area (justification and calculation will be required in relation to the extent of unprotected area in the proposed front elevation in relation to the street’s width).
- 10.189 In response to queries from officers, the applicant submitted a Fire Planning Report dated 14/08/2017, which states that – with a mechanically-ventilated protected lobby adjacent to the stairwell, and making the stair core a firefighting shaft – an alternative means of escape is not needed above 11m, and the main staircase can extend down to basement level. Regarding the extent of unprotected area to the proposed development’s elevations, the applicant proposes to either remain within the limits set

out in the Building Regulations, or would implement compensatory measures such as compartment floors or a sprinkler system.

- 10.190 The London Fire and Emergency Planning Authority have not responded to the council's consultation. The council's Building Control team have noted the lack of detail in the applicant's proposals, particularly in relation to the proposal to provide a firefighting shaft and fire-engineer the development to overcome the need for an alternative means of escape. It must be noted, however, that these details are not normally provided at planning application stage, and if some amendments to the proposed development (in the form of internal reconfiguration) are required in order to comply with the Building Regulations, there appears to be scope for doing this without rendering the development unacceptable in planning terms. For example, the necessary relocation of refuges from the lift lobbies can be achieved whilst ensuring the proposed development would still provide adaptable, accessible employment floorspace of a sufficiently high quality.
- 10.191 It is noted that fire brigade access to more than 15% of the site's perimeter (from the street) would be available. As noted earlier in this report, the proposed mobility scooter storage would need to be relocated, and these facilities and the proposed refuse/recycling store would need to be provided within fire-rated enclosures with appropriate ventilation to the outside. The proposed external materials for the new building's elevations are not known to be flammable.
- 10.192 The comments of the council's Building Control team are noted, however it is considered that the fire safety implications of the proposed development have been considered as far as is necessary and appropriate at this stage, given the extent to which these matters can be considered as part of the planning process without duplicating assessments that will be carried out at a later, detailed design stage with regard to the Building Regulations.
- 10.193 An informative (7), advising the applicant to contact the council's Building Control team in relation to fire safety, is recommended.

### **Contaminated Land and Air Quality**

- 10.194 The applicant's Contaminated Land (Phase 1) Assessment states that the site was historically occupied by housing, a school, a clothing factory and chemical supplier, and a clothing warehouse before the current office use commenced. Surrounding uses included warehousing and factories.
- 10.195 The council's Pollution Team noted that the site would be covered by hardstanding and a basement. Officers further advised that the likelihood of a pollution linkage (between staff and visitors and any contamination that may exist on site) would be limited, but that the applicant should keep a watching brief and undertake site testing, as set out in the applicant's Contaminated Land (Phase 1) Assessment. The Pollution Team have not recommended conditions relating to site contamination.
- 10.196 The whole of the borough has been designated by the council as an Air Quality Management Area. It is recommended that, for the proposed development's construction phase, the submission, approval and implementation of a Construction Environmental Management Plan (CEMP) assessing the environmental impacts

(including in relation to air quality, dust, smoke and odour) be secured by condition (23). This would help ensure that the proposal would not detrimentally impact upon the amenity of the neighbouring occupiers with regard to air quality. Emissions from non-road mobile machinery would also need to be addressed in submissions made pursuant to condition 23.

- 10.197 The proposed development includes no on-site combined heat and power (CHP) facility or other potentially significant source of air pollution. For the development's operational phase, therefore, it is considered that conditions controlling emissions are not necessary. The council's Pollution Team has not recommended amendments or a condition relating to staff exposure to poor quality air.

### **Planning Obligations, Community Infrastructure Levy and Local Finance Considerations**

#### *Community Infrastructure Levy*

- 10.198 Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), the Mayor of London's and Islington's Community Infrastructure Levy (CIL) would be chargeable on the proposed development on grant of planning permission. This is calculated in accordance with the Mayor's adopted Community Infrastructure Levy Charging Schedule 2012 and the Islington adopted Community Infrastructure Levy Charging Schedule 2014.
- 10.199 Islington CIL of £65,524.22, and Mayoral CIL of £43,890.94, would be payable in relation to the proposed development.

#### *Section 106 agreement*

- 10.200 As noted earlier in this report, paragraph 173 of the NPPF states that the sites and the scale of development identified in development plans should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 10.201 Paragraph 176 adds that, where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements. The need for such safeguards should be clearly justified through discussions with the applicant, and the options for keeping such costs to a minimum fully explored, so that development is not inhibited unnecessarily.
- 10.202 Paragraphs 203 to 205 provide guidance on the use of planning obligations.
- 10.203 Planning Practice Guidance confirms that planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms (paragraph: 001, reference ID: 23b-001-20161116), and states that local authorities

should ensure that the combined total impact of conditions, CIL and planning obligations does not threaten the viability of the sites and scale of development identified in the development plan (paragraph: 002, reference ID: 23b-002-20140306). Regarding the negotiability of planning obligations, the guidance recognises that, where planning obligations provide essential site specific items to mitigate the impact of the development, such as a necessary road improvement, there may only be limited opportunity to negotiate (paragraph: 006, reference ID: 23b-006-20140306). The guidance also states that applicants do not have to agree to a proposed planning obligation, but that this may lead to a refusal of planning permission (paragraph: 008, reference ID: 23b-008-20140306).

- 10.204 Core Strategy policy CS18 states that the council will require contributions from new development to ensure that the infrastructure needs associated with development will be provided for, and to mitigate the impact of development.
- 10.205 Development Management Policy DM9.2 states that planning obligations will be used by the council to deliver sustainable development. This may include (but is not limited to) compensation for loss or damage associated with a development, mitigation of the impacts of a development, prescription of the nature of a development, and other measures to make a development acceptable in planning terms, where possible and appropriate, in accordance with the Community Infrastructure Levy Regulations.
- 10.206 Further guidance is provided in the council's Planning Obligations (Section 106) SPD.
- 10.207 Prior to and following the amendment of the proposals, officers advised the applicant that a Section 106 agreement including relevant Heads of Terms would be necessary in order to adequately mitigate the impacts of the proposed development. Based on the current (as amended) proposals, the necessary Heads of Terms are:
- Payment towards employment and training for local residents of a commuted sum of £5,754.
  - A contribution towards Crossrail of £95,158 (from which the abovementioned Mayoral CIL would be deducted).
  - A contribution towards provision of off-site affordable housing of £108,752.
  - The repair and reinstatement of the footways and highways adjoining the development. The cost is to be confirmed by LBI Highways, paid for by the applicant and the work carried out by LBI Highways. Conditions surveys may be required.
  - Compliance with the Code of Employment and Training.
  - Facilitation, during the construction phase of the development, of one work placement. The placement must last a minimum of 26 weeks. The council's approved provider/s to recruit for and monitor placements, with the developer/contractor to pay wages. The contractor is expected to pay the going rate for an operative, and industry research indicates that this is invariably above or well above the national minimum wage and even the London Living Wage. If this placement is not provided, a fee of £5,000 to be paid to the council.
  - Compliance with the Code of Local Procurement.
  - Compliance with the Code of Construction Practice, including a monitoring fee of £2,337, and submission of site-specific response document to the Code of

Construction Practice for approval of LBI Public Protection, which shall be submitted prior to any works commencing on site.

- The provision of two additional accessible parking bays or a contribution towards bays or other accessible transport initiatives of £4,000.
- A contribution towards offsetting any projected residual carbon dioxide emissions of the development, to be charged at the established price per tonne of carbon dioxide for Islington (currently £920). Total amount: £62,560.
- Future-proofing of any on-site heating/hot water system so that the development can be connected to a local energy network if a viable opportunity arises in the future.
- Submission of a Green Performance Plan.
- Submission of a draft full Travel Plan for council approval prior to occupation, and of a full Travel Plan for council approval six months from first occupation of the development (provision of Travel Plan required subject to thresholds shown in Table 7.1 of the Planning Obligations SPD).
- Council's legal fees in preparing the Section 106 agreement and officer's fees for the preparation, monitoring and implementation of the Section 106 agreement.

10.208 All payments to the council would be index-linked from the date of Committee and would be due upon implementation of the planning permission.

10.209 In addition to the above obligation regarding future-proofing, a requirement to review the possibility of a connection to a local energy network (DEN or SHN) is considered necessary, as discussed earlier in this report.

10.210 Of note, the above obligations are considered essential to mitigate the impacts of the proposed development, and to make it acceptable in planning terms. They are not unnecessary, additional benefits (or "nice things to have") that go beyond what is needed. Furthermore, a robust and comprehensive evidence base supports the requirements for them and the formulae used to calculate those obligations that involve a financial contribution. CIL fees are non-negotiable.

10.211 As noted earlier in this report, the applicant, in a letter dated 15/08/2017, argued that the development would achieve insufficient profit, and that only £103,545 of CIL and Section 106 contributions could be agreed to at this stage. For the other contributions sought by the council, the applicant suggested a trigger be agreed, securing their payment should a viability review find that the development has become more profitable. Given the assessment of the proposed development's viability by BPS and officers, it is not recommended that the applicant's proposal be accepted, not least because it would run the risk of the development going ahead without some essential contributions ever being paid.

10.212 Although the applicant maintains that the proposed development would not be viable and deliverable, in response to officer advice, and in order to progress the application, on 15/09/2017 the applicant verbally agreed to the abovelisted Heads of Terms being included in a Section 106 agreement, with none being deferred to viability review stage. Officers have therefore begun drafting a Section 106 including the above Heads of Terms.

## **National Planning Policy Framework**

- 10.213 Paragraph 17 of the NPPF sets out 12 core planning principles that should underpin decision-taking. The current proposal is strong in relation to the principles relating to the reuse of land and achieving high quality design. With the recommended conditions and Section 106 agreement, the proposed development would go some way towards addressing the NPPF's core principle related to addressing climate change. The proposal is not considered to be fully compliant in relation to the principle relating to achieving a good standard of amenity for existing occupants.
- 10.214 In the final balance of planning considerations set out below, officers have also considered the proposal in the context of the presumption in favour of sustainable development set out in the NPPF.

## **Other Matters**

- 10.215 The applicant proposes excavation of the site, and although this is an island site and is separated from adjacent buildings by highways (which potentially reduces risks of damage to adjacent buildings – including the Grade II listed 12 Old Street – during excavation works), in accordance with Islington's Basement Development SPD, the submission and assessment of a Structural Method Statement was necessary. Relevant information has been provided in the submitted Report on Structural and Drainage Strategy at Sycamore House (GDC Partnership, 23/09/2016), which details how the proposed development can be constructed without detrimental impacts upon adjacent properties. Page 8 of the report confirms that the applicant proposes a 275mm thick reinforced concrete retaining wall around the full perimeter of the site which would be thickened in places to form continuous columns to avoid the need for any transfer structures at ground floor level. The applicant's consultant acknowledges that this proposed solution requires a complicated step-by-step construction sequence which would have a significantly longer duration than alternative solutions.
- 10.216 As confirmed at paragraph 6.4 of Islington's Basement Development SPD, the council (as Local Planning Authority) is not required to approve a technical solution for a development proposal in relation to structural stability, but is keen to ensure that such issues have been sufficiently evaluated and responded to in a design, and to ensure that this process has been undertaken by a suitably qualified and experienced professional. It is noted that the applicant's report was prepared by a Member of the Institute of Civil Engineers. A relevant condition (19), requiring the retention of a suitably qualified professional during excavation and construction, is recommended in accordance with paragraph 6.10 of the SPD.
- 10.217 Piled foundations are proposed, therefore it is recommended that Thames Water's proposed condition regarding piling be applied (condition 28).
- 10.218 The impact of the proposed development upon adjacent property values is not a material planning consideration, and planning permission cannot be withheld on these grounds.

## 11 SUMMARY AND CONCLUSION

### Summary

- 11.1 The benefits of the proposed development must be noted. These include the re-use of an underused site, the replacement of an unattractive building and its incongruous stepped and sloped massing, the provision of floorspace suitable for occupation by micro or small enterprises, the formalisation of refuse and cycle storage, and surface water run-off improvements. The replacement of the existing floorspace with a higher quality, more accessible and more flexible employment space, and the proposed uplift in office floorspace (of 680sqm GIA, 447sqm NIA) are also significant benefits. CIL contributions towards transport and other infrastructure, although required in order to mitigate the impacts of the development, would also benefit existing residents and visitors to the area. A financial contribution towards affordable housing in the borough, and a construction-phase work placement, would be secured through a Section 106 agreement.
- 11.2 These benefits must, however, be weighed against the shortcomings of the proposed development, the material harm that the proposed development would cause, and the development's non-compliance with development plan policies. Officers' primary concerns relate to the impacts of the proposed development upon the amenities of some neighbouring properties.
- 11.3 The comments made by residents and neighbouring businesses have been considered, as have responses from consultee bodies.
- 11.4 It must be noted that the statutory starting point in the council's assessment of planning applications is to assess them against all relevant Development Plan policies and other material considerations, then to determine them in accordance with the plan as a whole unless material considerations indicate otherwise.
- 11.5 In this case, the benefits of the proposed development (as amended) have been given due consideration, and are considered to outweigh those shortcomings of the development which cannot be adequately mitigated through the use of conditions and the provisions of a Section 106 agreement.
- 11.6 In conclusion, given the proposed development's adequate level of compliance with planning policies (including those of the NPPF and the London Plan), on balance it is recommended that planning permission be granted.

### Conclusion

- 11.7 It is recommended that planning permission be granted subject to conditions and Section 106 agreement Heads of Terms as set out in Appendix 1 – RECOMMENDATIONS.

## APPENDIX 1 – RECOMMENDATIONS

### RECOMMENDATION A

That planning permission be granted subject to the prior completion of a Deed of Planning Obligation made under Section 106 of the Town and Country Planning Act 1990 between the council and all persons with an interest in the land (including mortgagees) in order to secure the following planning obligations to the satisfaction of the Head of Law and Public Services and the Service Director, Planning and Development / Head of Service – Development Management or, in their absence, the Deputy Head of Service:

- Payment towards employment and training for local residents of a commuted sum of £5,754.
- A contribution towards Crossrail of £95,158 (from which the abovementioned Mayoral CIL would be deducted).
- A contribution towards provision of off-site affordable housing of £108,752.
- The repair and reinstatement of the footways and highways adjoining the development. The cost is to be confirmed by LBI Highways, paid for by the applicant and the work carried out by LBI Highways. Conditions surveys may be required.
- Compliance with the Code of Employment and Training.
- Facilitation, during the construction phase of the development, of one work placement. The placement must last a minimum of 26 weeks. The council's approved provider/s to recruit for and monitor placements, with the developer/contractor to pay wages. The contractor is expected to pay the going rate for an operative, and industry research indicates that this is invariably above or well above the national minimum wage and even the London Living Wage. If this placement is not provided, a fee of £5,000 to be paid to the council.
- Compliance with the Code of Local Procurement.
- Compliance with the Code of Construction Practice, including a monitoring fee of £2,337, and submission of site-specific response document to the Code of Construction Practice for approval of LBI Public Protection, which shall be submitted prior to any works commencing on site.
- The provision of two additional accessible parking bays or a contribution towards bays or other accessible transport initiatives of £4,000.
- A contribution towards offsetting any projected residual carbon dioxide emissions of the development, to be charged at the established price per tonne of carbon dioxide for Islington (currently £920). Total amount: £62,560.
- Future-proofing of any on-site heating/hot water system so that the development can be connected to a local energy network (DEN or SHN) if a viable opportunity arises in the future. Review of connection to a DEN or SHN required should implementation of planning permission be delayed.
- Submission of a Green Performance Plan.
- Submission of a draft full Travel Plan for council approval prior to occupation, and of a full Travel Plan for council approval six months from first occupation of the development (provision of Travel Plan required subject to thresholds shown in Table 7.1 of the Planning Obligations SPD).

- Council's legal fees in preparing the Section 106 agreement and officer's fees for the preparation, monitoring and implementation of the Section 106 agreement.

That, should the Section 106 Deed of Planning Obligation not be completed within the Planning Performance Agreement timeframe the Service Director, Planning and Development / Head of Service – Development Management or, in their absence, the Deputy Head of Service may refuse the application on the grounds that the proposed development, in the absence of a Deed of Planning Obligation is not acceptable in planning terms.

ALTERNATIVELY should this application be refused (including refusals on the direction of the Secretary of State or the Mayor of London) and appealed to the Secretary of State, the Service Director, Planning and Development / Head of Service – Development Management or, in their absence, the Deputy Head of Service be authorised to enter into a Deed of Planning Obligation under Section 106 of the Town and Country Planning Act 1990 to secure the Heads of Terms as set out in this report to Committee.

## RECOMMENDATION B

That the grant of planning permission be subject to **conditions** to secure the following:

### List of Conditions:

<b>1</b>	<b>Commencement (Compliance)</b>
	<p>CONDITION: The development hereby permitted shall be begun not later than the expiration of three years from the date of this permission.</p> <p>REASON: To comply with the provisions of Section 91(1)(a) of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004 (Chapter 5).</p>
<b>2</b>	<b>Approved plans and documents list (Compliance)</b>
	<p>CONDITION: The development hereby approved shall be carried out in accordance with the following approved plans and documents:</p> <p>434-PA.01 rev P7  434-PA.02 rev P7  434-PA.03 rev P7  434-PA.04 rev P7  434-PA.05 rev P7  434-PA.06 rev P7  434-PA.07 rev P7  434-PA.08 rev P7  434-PA.09 rev P7  434-PA.10 rev P4  434-PA.11 rev P4  434-PA.12 rev P5  434-PA.13 rev P5</p>

	<p>434-PA.14 rev P5  434-PA.15 rev P5  Design, Heritage and Planning Statement (Gpad, undated) as amended by abovelisted drawings  Area Schedule (Gpad, 03/08/2017)  Historic Environment Assessment (MoLA, October 2016)  Daylight and Sunlight Report Update – Revision B (MES, 14/09/2017)  Noise and Vibration Assessment (Philip Acoustics Ltd, September 2015)  HUDU Assessment Matrix (30/10/2016)  Contaminated Land (Phase 1) Assessment (Delta Simons, July 2016)  Sustainable Design and Construction Statement (Metropolis Green, 07/10/2016)  Site Waste Management Plan (Delta Simons, July 2016)  Energy Strategy (Metropolis Green, 07/10/2016), as amended by email from Joe Ashton and attachment (19/09/2017)  Thermal Comfort Report (Metropolis Green, 07/10/2016)  Green Performance Plan (Metropolis Green, 29/09/2016)  Mechanical Design Philosophy (AWA, undated)  Fire Planning Report (IFC, 14/08/2017)  Report on Structural and Drainage Strategy (GDC Partnership, 23/09/2016)  Transport Statement (TPC, October 2016)  Travel Plan (TPC, October 2016)  Delivery and Servicing Management Plan (TPC, October 2016)  Construction Management and Logistics Plan (Galliford Try, undated)  Biodiversity Report (Planning Sense, undated)  Economic Viability Appraisal Report (ULL Property, December 2016)</p> <p>REASON: For the avoidance of doubt and in the interest of proper planning.</p>
<b>3</b>	<b>Materials and samples (Details)</b>
	<p>CONDITION: A Green Procurement Plan for sourcing the materials to be used in the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing. The Green Procurement Plan shall demonstrate how the procurement of materials for the development will promote sustainability, including through the use of low impact, sustainably-sourced, reused and recycled materials and the reuse of demolition waste. The materials shall be procured and the development shall be carried out strictly in accordance with the Green Procurement Plan so approved.</p> <p>Details of all facing materials including samples shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing. The details and samples shall include:</p> <ul style="list-style-type: none"> <li>a) brickwork, bond (to be Flemish) and mortar courses;</li> <li>b) copings;</li> <li>c) metal (or other) cladding panels (including details of the edge and seams/gap treatments, method(s) of fixing, and any profiling);</li> <li>d) windows and doors;</li> <li>e) glass balustrades;</li> <li>f) roofing materials; and</li> </ul>

	<p>g) any other materials to be used on the exterior of the development.</p> <p>The development shall be carried out strictly in accordance with the details and samples so approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: In the interests of securing sustainable development and to ensure that the resulting appearance and construction of the development is of a high standard and contributes positively to the significance of heritage assets in accordance with policies 5.3, 7.4, 7.5, 7.6, 7.8 and 7.9 of the London Plan 2016, policies CS7, CS9 and CS10 of Islington's Core Strategy 2011, policy BC7 in the Finsbury Local Plan, and policies DM2.1, DM2.3 and DM7.4 of Islington's Development Management Policies 2013.</p>
<b>4</b>	<b>Roof-level structures (Details)</b>
	<p>CONDITION: Details of any roof-level structures (including lift over-runs, flues/extracts, plant, photovoltaic panels and window cleaning apparatus) shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing. The details shall include a justification for the height and size of the roof-level structures, their location, height above roof level, specifications and cladding.</p> <p>The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority. No roof-level structures shall be installed other than those approved.</p> <p>REASON: In the interests of good design and also to ensure that the Local Planning Authority may be satisfied that any roof-level structures do not have a harmful impact on the surrounding streetscene, the character and appearance of the area, or the settings and significance of heritage assets in accordance with policies 7.4, 7.6, 7.8 and 7.9 of the London Plan 2016, policies CS7 and CS9 of Islington's Core Strategy 2011, policy BC7 in the Finsbury Local Plan, and policies DM2.1 and DM2.3 of Islington's Development Management Policies 2013.</p>
<b>5</b>	<b>Window and door reveals (Compliance)</b>
	<p>CONDITION: All windows and doors in elevations other than the front elevation of the development hereby approved shall be set within reveals no less than 200mm deep unless otherwise agreed in writing by the Local Planning Authority. Windows and doors in the front elevation of the development hereby approved shall be set within deeper reveals as shown in the drawings and images hereby approved.</p> <p>REASON: To ensure that the resulting appearance and construction of the development is to a high standard, to ensure sufficient articulation in the elevations, and to ensure that the development enhances the settings and significance of heritage assets in accordance with policies 7.4, 7.6, 7.8 and 7.9 of the London Plan 2016, policies CS7 and CS9 of Islington's Core Strategy 2011, policy BC7 in the Finsbury Local Plan, and policies DM2.1 and DM2.3 of Islington's Development</p>

	Management Policies 2013.
<b>6</b>	<b>External pipes, cables and CCTV (Compliance and Details)</b>
	<p>CONDITION: No cables, plumbing, down pipes, rainwater pipes, foul pipes or CCTV cameras or related equipment and installations shall be located/fixed to any elevation(s) of the buildings hereby approved.</p> <p>Should external cables, plumbing, down pipes, rainwater pipes, foul pipes and/or CCTV cameras or related equipment be considered necessary the details of these shall be submitted to and approved in writing by the Local Planning Authority prior to their installation.</p> <p>REASON: To ensure that the resulting appearance and construction of the development is to a high standard, and to ensure that the development enhances the settings and significance of heritage assets in accordance with policies 7.4, 7.6, 7.8 and 7.9 of the London Plan 2016, policies CS7 and CS9 of Islington's Core Strategy 2011, policy BC7 in the Finsbury Local Plan, and policies DM2.1 and DM2.3 of Islington's Development Management Policies 2013.</p>
<b>7</b>	<b>Lift workings – Baltic Street West elevation (Details)</b>
	<p>CONDITION: Details (plans, elevations and sections to a scale of 1:50) of the easternmost column of windows to the Baltic Street West elevation of the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing. The details so approved shall illustrate and confirm the materials, reveals, illumination, positioning of lift machinery and general appearance of the exposed lift workings.</p> <p>REASON: To ensure that the resulting appearance and construction of the development is to a high standard, and to ensure that the development enhances the settings and significance of heritage assets in accordance with policies 7.4, 7.6, 7.8 and 7.9 of the London Plan 2016, policies CS7 and CS9 of Islington's Core Strategy 2011, policy BC7 in the Finsbury Local Plan, and policies DM2.1 and DM2.3 of Islington's Development Management Policies 2013.</p>
<b>8</b>	<b>Ground floor / basement voids (Compliance)</b>
	<p>CONDITION: No obstructions, fixtures or fittings shall be placed over the internal voids (between the basement and ground floor) hereby approved unless otherwise agreed in writing by the Local Planning Authority.</p> <p>REASON: To ensure natural light reaches the basement office floorspace in accordance with policy 7.6 of the London Plan 2016, and policy DM2.1 of Islington's Development Management Policies 2013.</p>
<b>9</b>	<b>Security and general lighting (Details)</b>
	<p>CONDITION: Notwithstanding the approved drawings listed under condition 2, details of general or security outdoor lighting (including full specification of all luminaries, lamps and support structures) and measures to prevent losses of amenity caused by internal illumination shall be submitted to and approved in writing by the Local Planning Authority prior to superstructure works commencing</p>

	<p>on site.</p> <p>The development shall be carried out strictly in accordance with the details so approved prior to the first occupation of the development hereby approved and shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: In the interests of good design, security and protecting neighbouring and future residential amenity and future habitats from undue light-spill in accordance with policies 7.3, 7.5, 7.13 and 7.19 of the London Plan 2016, policies CS9, CS10 and CS15 of Islington's Core Strategy 2011, policy BC7 in the Finsbury Local Plan, and policies DM2.1 and DM6.5 of Islington's Development Management Policies 2013.</p>
<b>10</b>	<b>Roof terraces (Compliance)</b>
	<p>CONDITION: The roof terraces of the development hereby approved shall not be used except between the hours of 09:00 and 19:00 Monday to Friday except in the case of essential maintenance or repair, or escape in case of emergency.</p> <p>REASON: To ensure that the amenity of neighbouring residential properties is not adversely affected in accordance with policies 7.6 and 7.15 of the London Plan 2016 and policy DM2.1 of Islington's Development Management Policies 2013.</p>
<b>11</b>	<b>Inclusive design (Details)</b>
	<p>CONDITION: Details including floorplans, sections and elevations of all floorspace at a scale of 1:50 shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of any of the development's business floorspace. The details shall include:</p> <ul style="list-style-type: none"> <li>• accessible WC provision;</li> <li>• public entrances including sections showing level access, door furniture, door opening weights and manifestations to glazing;</li> <li>• space for the storage and charging of mobility scooters;</li> <li>• details of accessible changing facilities for staff;</li> <li>• details of evacuation arrangements for people with disabilities; and</li> <li>• details of how the development would comply with the relevant parts of the Inclusive Design in Islington SPD</li> </ul> <p>The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: To ensure the development is of an inclusive design in accordance with policy 7.2 of the London Plan 2016, policy CS12 of Islington's Core Strategy 2011, and policy DM2.2 of Islington's Development Management Policies 2013.</p>
<b>12</b>	<b>Disabled parking bays and drop-off (Details)</b>
	<p>CONDITION: A survey identifying appropriate and available locations for additional disabled parking bays within the vicinity of the site, and details of where on-street</p>

	<p>drop-off could be provided for employees and visitors with disabilities, shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development hereby approved.</p> <p>REASON: To ensure adequate provision of parking for residents with disabilities in accordance with policy DM8.5 of Islington's Development Management Policies 2013.</p>
<b>13</b>	<b>Cycle parking (Compliance)</b>
	<p>CONDITION: Detailed drawings and specifications of the bicycle storage area, and the racks within it, shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on site. The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>The bicycle storage areas, which shall be secure and provide for no less than 30 bicycle spaces (and an additional 2 spaces for accessible parking) shall be provided prior to the first occupation of the development hereby approved, shall be maintained as such thereafter and no change therefrom shall take place unless otherwise agreed in writing by the Local Planning Authority.</p> <p>REASON: To ensure adequate and suitable bicycle parking is available and easily accessible on site and to promote sustainable modes of transport in accordance with policy 6.9 of the London Plan 2016, policy CS10 of Islington's Core Strategy 2011, and policy DM8.4 of Islington's Development Management Policies 2013.</p>
<b>14</b>	<b>Micro and small enterprises (Details)</b>
	<p>CONDITION: Details, including floorplans, of business accommodation suitable for occupation by micro and small enterprises shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of any of the development's business floorspace. The details shall confirm that no less than 5% of the development's business floorspace shall be suitable for occupation by micro and small enterprises, and shall confirm the terms under which this floorspace shall be offered.</p> <p>The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority. The business accommodation suitable for occupation by micro and small enterprises at basement and ground floor level shall not be amalgamated with the remainder of the office floorspace in the development hereby approved.</p> <p>REASON: To ensure adequate provision of business accommodation suitable for occupation by micro and small enterprises in accordance with policy BC8 of the Finsbury Local Plan 2013.</p>
<b>15</b>	<b>Biodiversity enhancements (Details)</b>
	<p>CONDITION: Details of bat and bird nesting boxes/bricks and log piles for</p>

	<p>invertebrates shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing. The details to be submitted and approved shall include the exact location, specification and design of the installations.</p> <p>The development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority. The boxes/bricks and log piles shall be installed prior to the first occupation of the development hereby approved.</p> <p>REASON: To ensure the development provides the maximum possible provision in respect of the creation of habitats and valuable areas for biodiversity in accordance with policy 7.19 of the London Plan 2016, policy CS15 of the Islington Core Strategy 2011 and policy DM6.5 of Islington's Development Management Policies 2013.</p>
<p><b>16</b></p>	<p><b>Green roofs (Details and Compliance)</b></p>
	<p>CONDITION: Notwithstanding the plans hereby approved, details of green roofs to the development hereby approved (including details of the extent of green roofs, and the species to be planted/seeded) shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing. The green roofs shall:</p> <ul style="list-style-type: none"> <li>• form biodiversity-based roofs with extensive substrate bases (depth 80-150mm);</li> <li>• cover at least all of the areas shown in the drawings hereby approved, confirmed by a location/extent plan; and</li> <li>• be planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works.</li> </ul> <p>An explanation as to why any areas of roof would not be covered with green roofs shall be included with the above details. Green roofs shall be expected to extend beneath any photovoltaic arrays proposed at roof level.</p> <p>The green roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.</p> <p>The development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter, and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity, to protect neighbouring privacy, and to ensure surface water run-off rates are reduced in accordance with policies 5.3, 5.10, 5.11, 5.13 and 7.19 of the London Plan 2016, policies CS10 and CS15 of Islington's Core Strategy 2011, and policies DM2.1, DM6.5, DM6.6 and DM7.1 of Islington's Development Management Policies 2013.</p>

<b>17</b>	<b>Sustainable urban drainage (Details)</b>
	<p>CONDITION: Notwithstanding the information submitted in support of the development hereby approved, prior to any works commencing on site a revised drainage strategy including full justification for any non-compliance with the requirements of Development Management Policy DM6.6 and London Plan policy 5.13, and confirmation that best endeavours have been made to comply with these policies, shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter, and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: To ensure the development achieves appropriate surface water run-off rates in accordance with policy 5.13 of the London Plan 2016 and policy DM6.6 of Islington's Development Management Policies 2013.</p>
<b>18</b>	<b>Archaeology – written scheme of investigation (Details)</b>
	<p>CONDITION: No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved in writing by the Local Planning Authority in consultation with Historic England. For land that is included in the WSI, no demolition or development shall take place other than in accordance with the approved WSI and the programme and methodology of site evaluation, and following the nomination of (a) competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the Local Planning Authority in writing. For land that is included within the stage 2 WSI, no demolition or development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <ul style="list-style-type: none"> <li>a) The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of (a) competent person(s) or organisation to undertake the agreed works; and</li> <li>b) The programme for post-investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</li> </ul> <p>REASON: Heritage assets of archaeological interest may survive on the site and it is appropriate to secure archaeological investigation in accordance with section 12 of the National Planning Policy Framework, policy 7.8 of the London Plan 2016, policy CS9 of Islington's Core Strategy 2011 and policy DM2.3 of Islington's Development Management Polices 2013.</p>
<b>19</b>	<b>Basement works (Compliance)</b>

	<p>CONDITION: The author of the Report on Structural and Drainage Strategy (GDC Partnership, 23/09/2016) hereby approved (or a suitably qualified person with relevant experience) shall be retained throughout the duration of works.</p> <p>REASON: To ensure the necessary expertise is available to inform decision making throughout the demolition, excavation and construction process in compliance with Islington's Basement Development SPD.</p>
<b>20</b>	<b>BREEAM (Compliance)</b>
	<p>CONDITION: All office floorspace within the development hereby approved shall achieve a BREEAM (2011) New Construction Scheme rating of no less than "Excellent".</p> <p>REASON: In the interests of sustainable development and addressing climate change in accordance with policies 5.2 and 5.3 of the London Plan 2016, policy CS10 of Islington's Core Strategy 2011 and policy DM7.4 of Islington's Development Management Policies 2013.</p>
<b>21</b>	<b>Energy/carbon dioxide reduction (Details)</b>
	<p>CONDITION: A revised Energy Strategy, including the measures set out in the Energy Strategy (Metropolis Green, 07/10/2017) as amended by email from Joe Aston and attachment (19/09/2017) hereby approved, and additional measures, shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on site. The revised Energy Strategy shall provide for no less than a 27% on-site total (regulated and unregulated) carbon dioxide reduction in comparison with total emissions from a building which complies with Building Regulations 2013, and all the measures set out in the revised Energy Strategy shall be installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>REASON: In the interests of sustainable development and to ensure that the Local Planning Authority may be satisfied that the carbon dioxide reduction target is met in accordance with policies 5.2, 5.3 and 5.7 of the London Plan 2016, policy CS10 of the Islington Core Strategy 2011, and policies DM7.1 and DM7.3 of Islington's Development Management Policies 2013.</p>
<b>22</b>	<b>Demolition and Construction Management and Logistics Plan (Details)</b>
	<p>CONDITION: No demolition shall take place unless and until an updated and site-specific Demolition and Construction Management and Logistics Plan (DCMLP) has been submitted to and approved in writing by the Local Planning Authority.</p> <p>The development shall be carried out strictly in accordance with the approved DCMLP throughout the demolition and construction period.</p> <p>REASON: In the interests of residential amenity, highway safety and the free flow of traffic on streets, and to mitigate the impacts of the development in accordance with policies 6.3 and 6.14 of the London Plan 2016 and policy DM8.6 of Islington's Development Management Policies 2013.</p>

<b>23</b>	<b>Construction Environmental Management Plan (Details)</b>
	<p>CONDITION: A Construction Environmental Management Plan (CEMP) assessing the environmental impacts (including (but not limited to) noise, air quality including dust, smoke and odour, emissions from non-road mobile machinery, vibration, light pollution and TV reception) of the development shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on site. The report shall assess impacts during the construction phase of the development on nearby residents and other occupiers together with means of mitigating any identified impacts.</p> <p>The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: In the interests of residential and local amenity, and air quality, in accordance with policies 7.14 and 7.15 of the London Plan 2016, policy CS12 of Islington's Core Strategy 2011, and policy DM2.1 of Islington's Development Management Policies 2013.</p>
<b>24</b>	<b>Delivery and Servicing Management Plan and Waste Management Plan (Details)</b>
	<p>CONDITION: An updated Delivery and Servicing Management Plan (DSMP), including a Waste Management Plan (WSP), shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London prior to the first occupation of the development.</p> <p>The DSMP shall include details of all servicing and delivery requirements, including details of how waste (including recyclable waste) would be transferred and collected, and shall confirm the timings of all deliveries and collections from service vehicles.</p> <p>The development shall be carried out strictly in accordance with the DSMP (including the WSP) so approved.</p> <p>REASON: In the interests of residential amenity, highway safety and the free flow of traffic on streets, and to mitigate the impacts of the development in accordance with policies 5.16, 6.3 and 6.14 of the London Plan 2016, policy CS11 of Islington's Core Strategy 2011, and policies DM2.1 and DM8.6 of Islington's Development Management Policies 2013.</p>
<b>25</b>	<b>Waste storage (Compliance)</b>
	<p>CONDITION: The dedicated refuse/recycling store hereby approved shall be provided prior to first occupation of the development hereby approved, no less than 50% of the store shall be retained for the storage of separated waste for recycling, and the store shall be maintained as such thereafter unless otherwise agreed in writing by the Local Planning Authority.</p> <p>REASON: To ensure the necessary physical waste storage to support the development is provided in accordance with policy 5.16 of the London Plan 2016,</p>

	policy CS11 of Islington's Core Strategy 2011 and policy DM2.1 of Islington's Development Management Policies 2013.
<b>26</b>	<b>Plant noise (Compliance and Details)</b>
	<p>CONDITION: The design and installation of any new items of fixed plant shall be such that when operating the cumulative noise level <math>L_{Aeq,T}</math> arising from the proposed plant, measured or predicted at 1m from the façade of the nearest noise sensitive premises, shall be a rating level of at least 5dB(A) below the background noise level <math>L_{AF90,T}</math>. The measurement and/or prediction of the noise shall be carried out in accordance with the methodology contained within BS 4142:2014.</p> <p>A report to demonstrate compliance with the above requirements and prepared by an appropriately experienced and qualified professional shall be submitted to and approved by the Local Planning Authority.</p> <p>The development shall be carried out strictly in accordance with the scheme and report so approved prior to first occupation, shall be maintained as such thereafter, and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: To ensure that the development does not have an undue adverse impact on nearby residential amenity or business operations in accordance with policy in accordance with policy 7.15 of the London Plan 2016, policy CS12 of Islington's Core Strategy 2011, and policy DM2.1 of Islington's Development Management Policies 2013.</p>
<b>27</b>	<b>Plant noise hours (Compliance)</b>
	<p>CONDITION: Prior to any plant equipment being used, a timer shall be installed limiting the operation of any condenser units, heat pump and/or toilet extract fan to between the hours of 07:30 to 19:30 Monday to Friday. The plant shall not be operated outside of these hours. The timer shall be maintained as such thereafter.</p> <p>REASON: To ensure that the development does not have an undue adverse impact on nearby residential amenity or business operations in accordance with policy in accordance with policy 7.15 of the London Plan 2016, policy CS12 of Islington's Core Strategy 2011, and policy DM2.1 of Islington's Development Management Policies 2013.</p>
<b>28</b>	<b>Piling (Details)</b>
	<p>CONDITION: No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>REASON: Works are proposed in close proximity to underground sewerage utility infrastructure, and piling has the potential to impact on local underground sewerage</p>

	utility infrastructure.
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**List of Informatives:**

<b>1</b>	<b>Section 106 Agreement</b>
	You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.
<b>2</b>	<b>Definition of ‘Superstructure’ and ‘Practical Completion’</b>
	A number of conditions attached to this permission have the time restrictions ‘prior to superstructure works commencing on site’ and/or ‘following practical completion’. The council considers the definition of ‘superstructure’ as having its normal or dictionary meaning, which is: the part of a building above its foundations. The council considers the definition of ‘practical completion’ to be: when the work reaches a state of readiness for use or occupation even though there may be outstanding works/matters to be carried out.
<b>3</b>	<b>Community Infrastructure Levy (CIL) (Granting Consent)</b>
	<p>Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Islington’s Community Infrastructure Levy (CIL) and the Mayor of London’s Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Islington CIL Charging Schedule 2014 and the Mayor of London CIL Charging Schedule 2012. One of the development parties must now assume liability to pay CIL by submitting an Assumption of Liability Notice to the council at <a href="mailto:cil@islington.gov.uk">cil@islington.gov.uk</a>. The council will then issue a Liability Notice setting out the amount of CIL that is payable.</p> <p>Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed. The above forms can be found on the planning portal at: <a href="http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil">www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil</a></p> <p><b>Pre-Commencement Conditions:</b> These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of these unidentified pre-commencement conditions have been discharged.</p>
<b>4</b>	<b>Sustainable Sourcing of Materials</b>
	Materials procured for the development should be selected to be sustainably sourced and otherwise minimise their environmental impact, including through maximisation of recycled content, use of local suppliers and by reference to the BRE’s Green Guide Specification.
<b>5</b>	<b>Thames Water and Historic England</b>
	Your attention is drawn to informatives and advice included in Thames Water’s comments of 22/12/2016 and Historic England’s comments of 17/01/2017.

<b>6</b>	<b>Contaminated Land</b>
	You are advised to keep a watching brief and undertake site testing as set out in the Contaminated Land (Phase 1) Assessment (Delta Simons, July 2016) hereby approved.
<b>7</b>	<b>Fire Safety</b>
	It is recommended that you obtain technical advice regarding compliance with the Building Regulations (and/including matters relating to fire safety and evacuation) prior to any further design work commencing and prior to the selection of materials. Islington's Building Control team has extensive experience in working with clients on a wide range of projects. Should you wish to discuss your project and how Islington Building Control may best advise you regarding compliance with relevant (building control) regulations, please contact Andrew Marx on 020 7527 2045 or by email on <a href="mailto:andrew.marx@islington.gov.uk">andrew.marx@islington.gov.uk</a>

## **APPENDIX 2 – RELEVANT POLICIES**

This appendix lists all relevant Development Plan policies and guidance notes pertinent to the determination of this planning application.

### **1 National Guidance**

The National Planning Policy Framework 2012 seeks to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF is a material consideration and has been taken into account as part of the assessment of these proposals.

Since March 2014 Planning Practice Guidance for England has been published online.

### **2 Development Plan**

The Development Plan comprises the London Plan 2016 (incorporating Minor Alterations), Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013. The following policies of the Development Plan are considered relevant to this application:

#### **A) The London Plan 2016 – Spatial Development Strategy for Greater London**

##### **1 Context and strategy**

Policy 1.1 Delivering the strategic vision and objectives for London

##### **2 London's places**

Policy 2.9 Inner London

Policy 2.10 Central Activities Zone – Strategic Priorities

Policy 2.11 Central Activities Zone – Strategic Functions

Policy 2.12 Central Activities Zone – Predominantly Local Activities

Policy 2.18 Green infrastructure: the network of open and green spaces

##### **3 London's people**

Policy 3.1 Ensuring equal life chances for all

Policy 3.2 Improving health and addressing health inequalities

Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes

Policy 3.16 Protection and enhancement of social infrastructure

##### **4 London's economy**

Policy 5.15 Water use and supplies

Policy 5.16 Waste net self-sufficiency

Policy 5.18 Construction, excavation and demolition waste

Policy 5.20 Aggregates

Policy 5.21 Contaminated land

##### **6 London's transport**

Policy 6.1 Strategic approach

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.5 Funding Crossrail and other strategically important transport infrastructure

Policy 6.7 Better streets and surface transport

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.13 Parking

##### **7 London's living places and spaces**

Policy 7.1 Lifetime neighbourhoods

Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime

Policy 7.4 Local character

Policy 4.1 Developing London's economy  
Policy 4.2 Offices  
Policy 4.3 Mixed use development and offices  
Policy 4.7 Retail and town centre development  
Policy 4.10 New and emerging economic sectors  
Policy 4.12 Improving opportunities for all

### **5 London's response to climate change**

Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising carbon dioxide emissions  
Policy 5.3 Sustainable design and construction  
Policy 5.5 Decentralised energy networks  
Policy 5.6 Decentralised energy in development proposals  
Policy 5.7 Renewable energy  
Policy 5.9 Overheating and cooling  
Policy 5.10 Urban greening  
Policy 5.11 Green roofs and development site environs  
Policy 5.12 Flood risk management  
Policy 5.13 Sustainable drainage  
Policy 5.14 Water quality and wastewater infrastructure

Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.8 Heritage assets and archaeology  
Policy 7.9 Heritage-led regeneration  
Policy 7.11 London View Management Framework  
Policy 7.13 Safety, security and resilience to emergency  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes  
Policy 7.18 Protecting local open space and addressing local deficiency  
Policy 7.19 Biodiversity and access to nature  
Policy 7.21 Trees and woodlands

### **8 Implementation, monitoring and review**

Policy 8.1 Implementation  
Policy 8.2 Planning obligations  
Policy 8.3 Community infrastructure levy

## **B) Islington Core Strategy 2011**

### **Spatial Strategy**

Policy CS7 (Bunhill and Clerkenwell)  
Policy CS8 (Enhancing Islington's Character)

### **Strategic Policies**

Policy CS9 (Protecting and Enhancing Islington's Built and Historic Environment)  
Policy CS10 (Sustainable Design)

Policy CS11 (Waste)  
Policy CS13 (Employment Spaces)  
Policy CS14 (Retail and Services)  
Policy CS15 (Open Space and Green Infrastructure)

### **Infrastructure and Implementation**

Policy CS18 (Delivery and Infrastructure)

## **C) Islington's Development Management Policies June 2013**

### **Design and Heritage**

DM2.1 Design  
DM2.2 Inclusive design  
DM2.3 Heritage  
DM2.4 Protected views

### **Transport**

DM8.1 Movement hierarchy  
DM8.2 Managing transport impacts  
DM8.3 Public transport  
DM8.4 Walking and cycling  
DM8.5 Vehicle parking

**Shops, culture and services**  
DM4.4 Promoting Islington's Town Centres

DM8.6 Delivery and servicing for new developments

**Employment**  
DM5.4 Size and affordability of workspace

**Infrastructure**  
DM9.1 Infrastructure  
DM9.2 Planning obligations  
DM9.3 Implementation

**Health and open space**  
DM6.1 Healthy development  
DM6.5 Landscaping, trees and biodiversity  
DM6.6 Flood prevention

**Energy and Environmental Standards**  
DM7.1 Sustainable design and construction statements  
DM7.3 Decentralised energy networks  
DM7.4 Sustainable design standards  
DM7.5 Heating and cooling

**D) Finsbury Local Plan June 2013**

BC7 Historic Clerkenwell  
BC8 Achieving a balanced mix of uses  
BC9 Tall buildings and contextual considerations for building heights  
BC10 Implementation

**3 Designations**

The site has the following designations under the London Plan 2016, Islington's Core Strategy 2011, Islington's Development Management Policies 2013 and the Finsbury Local Plan 2013:

<b>Islington Local Plan</b>	<b>London Plan</b>
Bunhill and Clerkenwell key area Employment Priority Area (General) Primary employment area St Luke's Conservation Area Archaeological Priority Area	Central Activities Zone

**4 Supplementary Planning Guidance (SPG) / Documents (SPD)**

The following SPGs and SPDs are relevant:

**Islington Local Plan**

- Basement Development SPD

**London Plan**

- Accessible London: Achieving an

- Conservation Area Design Guidelines (St Luke's and Hat and Feathers Conservation Areas)
- Development Viability SPD
- Environmental Design SPD
- Inclusive Design in Islington SPD
- Islington Urban Design Guide SPD
- Planning Obligations (Section 106) SPD
- Streetbook SPD

- Inclusive Environment SPG
- Central Activities Zone SPG
- The Control of Dust and Emissions During Construction and Demolition SPG
- Crossrail Funding SPG
- London Planning Statement SPG
- London View Management Framework SPG
- Planning for Equality and Diversity in London SPG
- Shaping Neighbourhoods – Character and Context SPG
- Social Infrastructure SPG
- Sustainable Design and Construction SPG
- Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG

**APPENDIX 3 – DESIGN REVIEW PANEL RESPONSE LETTER DATED  
29/08/2017**

ATT: Anand Shah  
Anand Shah, CFA  
Elmhurst Capital Management Limited  
Rm 1001 Yu Yuet Lai Building  
43-55 Wyndham Street  
Central  
Hong Kong

Planning Service  
Planning and Development  
PO Box 333  
222 Upper Street  
London  
N1 1YA  
  
T 020 7527 2389  
F 020 7527 2731  
E [Luciana.grave@islington.gov.uk](mailto:Luciana.grave@islington.gov.uk)  
W [www.islington.gov.uk](http://www.islington.gov.uk)  
  
Our ref: DRP/132  
  
Date: 29 August 2017

Dear Anand Shah,

**ISLINGTON DESIGN REVIEW PANEL**

**RE: Sycamore House, 5 Sycamore Street, London, EC1Y 0SR  
(planning application ref. P2016/4807/FUL)**

Thank you for attending Islington's Design Review Panel meeting on 8 August 2017 for a first review of the above scheme. The proposed scheme under consideration is for the demolition of existing B1 office building and construction of a replacement 7-storey (plus basement) B1 office building comprising 2,351sqm of office floor space.

**Review Process**

The Design Review Panel provides expert impartial design advice following the 10 key principles of design review established by Design Council/CABE. The scheme was reviewed by Richard Portchmouth (chair), Lotta Nyman, Marcus Lee, Tim Ronalds and Jeremy Foster on 8 August 2017 including a site visit and presentation from the design team followed by a question and answer session and deliberations at the offices of the London Borough of Islington. The views expressed below are a reflection of the Panel's discussions as an independent advisory body to the Council.

**Panel's observations**

The Panel acknowledged that this is an interesting site and welcomed the opportunities brought by the proposed scheme to improve upon the existing conditions. They found that in many respects, the proposal has been successful in attempting to realise some of those opportunities, particularly in terms of the form of the building. However, concerns were raised in relation to how the proposed concept has been translated into the design. They provided the following comments:

Form, height, massing

Panel members did not object to the proposed form, height and massing. They were of the opinion that the proposed form is generally more appropriate and responsive to the context than the existing building. It replaces the bizarre raked form, which does not contribute to the context and streetscape.

Concept and elevational treatment

Panel members appreciated that the design team presented a convincing analysis of composition and context with a suggestion that their design had taken reference from the strong warehouse typology of the site's surroundings. However, they were not of the opinion that the proposed design actually delivered the design aspirations and the references highlighted by the design team.



The Panel raised concerns that the conceptual explanation described the proposed building as a solid load bearing type of construction whereas they felt that it read more like a framed infill building. They were also concerned that the columns extended from ground floor to upper level without any horizontal break, with each level detailed in the same way, resulting in a building with an exaggerated vertical emphasis. In their opinion, it lacked the sense of a robust brick construction with punched openings as on the warehouse type of buildings referred to.

Panel members commended the design of the staircase but expressed concerns that it was not expressed on the elevation resulting in an excessive blank section of elevation with no animation or articulation.

#### Ground floor

The Panel raised concerns that although the design team expressed an intention to introduce a sense of hierarchy to the elevational composition, the elevation lacked a true sense of a strong base, middle and top. Panel members thought that the ground floor looked squat and not in keeping with the scale/proportion of the adjacent buildings or the precedents directly referenced.

Concerns were also raised about the quality of the basement accommodation due to the lack of windows.

The design team informed the Panel that plant had been omitted from the roof and would be relocated to the basement. The Panel questioned what impact this would have on the quality of the layout of the basement and possibly ground floor.

#### Materiality

The Panel did not raise objections to the principle of a stronger brick base and a lighter metal top. However, they were not convinced by the proposed use of two different types of bricks around the openings. They also felt the brick lacked a true sense of robustness due to the stretcher bond proposed. Concerns were also raised about the slot on the south elevation which disengages the bottom storeys of the building to the left and right of the main entrance.

They felt that the brickwork and detailing needed to be refined.

#### Connection with greenspace in front

The Panel emphasised that the scheme should have gone further by exploring its edges and how the proposed building relates to the public realm, in particular the greenspace – currently used as a motorcycle park - in front of the site. They felt this was a missed opportunity to improve that space and provide a better connection of the building's ground floor with the public realm.

#### **Summary**

The Panel welcomed the opportunity the scheme brings to improve on the current conditions of the site. However, panel members felt unconvinced about how the concept has been translated into the scheme. They were of the opinion that solidity and robustness of the warehouse typology hasn't been successfully carried over into the proposed design. They felt the proposed building lacked the depth of modelling and did not appear robust enough particularly in relation to how the ground floor related to the upper levels.

The Panel were not convinced that the proposed glass balustrades sit comfortably in a robust industrial typology building. They encouraged the design team to resolve the critical relationship of the proportions of the ground floor with upper levels, and how that relates to surrounding buildings, including revisiting the cornice level to ensure the ground floor is of an adequate scale.



The Panel also encouraged the design team to explore expressing the staircase in some manner on the elevation, to refine the detailing of the brickwork and to look into a better transition between the building's ground floor and the potential opportunities for the greenspace in front of it.

Thank you for consulting Islington's Design Review Panel. If there is any point that requires clarification, please do not hesitate to contact me and I will be happy to seek further advice from the Panel.

**Confidentiality**

Please note that since the scheme is at planning application stage, the views expressed in this letter may become public and will be taken into account by the council in the assessment of the proposal and determination of the application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lucy', written in a cursive style.

**Luciana Grave**  
Design Review Panel Coordinator  
Design & Conservation Team Manager

