



AGENDA FOR THE PLANNING SUB COMMITTEE A

Members of the Planning Sub Committee A are summoned to a meeting, which will be held in Committee Room 4, Town Hall, Upper Street, N1 2UD on, **3 September 2019 at 7.30 pm.**

Enquiries to : Ola Adeoye
Tel : 020 7527 3044
E-mail : democracy@islington.gov.uk
Despatched : 26 August 2019

Welcome:

Members of the public are welcome to attend this meeting.

Consideration of Planning Applications – This is a formal agenda where decisions are taken on planning applications submitted to the Council. Public speaking rights on these items are limited to those wishing to comment on specific applications. **If you wish to speak at the meeting please register by calling the Planning Department on 020 7527 2278 or emailing enquiriesplanning@islington.gov.uk.**

[Committee Membership](#)

[Wards](#)

[Substitute Members](#)



Councillor Picknell (Chair) - St Mary's;
Councillor Clarke - St George's;
Councillor Convery - Caledonian;
Councillor Graham - Bunhill;
Councillor Mackmurdie - Clerkenwell;

Councillor Klute - St Peter's;
Councillor Kay - Mildmay;
Councillor Poyser - Hillrise;
Councillor Spall - Hillrise;
Councillor Woolf -
Canonbury;
Councillor Chowdhury -
Barnsbury;
Councillor Gill - St
George's;
Councillor Hamitouche -
Barnsbury;
Councillor Turan - St Mary's;
Councillor Wayne -
Canonbury;
Councillor Webbe - Bunhill;

Quorum: 3 councillors

A. Formal Matters **Page**

1. Introductions
2. Apologies for Absence
3. Declarations of Substitute Members
4. Declarations of Interest

If you have a **Disclosable Pecuniary Interest*** in an item of business:

- if it is not yet on the council's register, you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent;
- you may **choose** to declare a Disclosable Pecuniary Interest that is already in the register in the interests of openness and transparency.

In both the above cases, you **must** leave the room without participating in discussion of the item.

If you have a **personal** interest in an item of business **and** you intend to speak or vote on the item you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent but you **may** participate in the discussion and vote on the item.

***(a) Employment, etc** - Any employment, office, trade, profession or vocation carried on for profit or gain.

(b) Sponsorship - Any payment or other financial benefit in respect of your expenses in carrying out duties as a member, or of your election; including from a trade union.

(c) Contracts - Any current contract for goods, services or works, between you or your partner (or a body in which one of you has a beneficial interest) and the council.

(d) Land - Any beneficial interest in land which is within the council's area.

(e) Licences- Any licence to occupy land in the council's area for a month or longer.

(f) Corporate tenancies - Any tenancy between the council and a body in which you or your partner have a beneficial interest.

(g) Securities - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

This applies to **all** members present at the meeting.

5. Order of Business 1 - 2
6. Minutes of Previous Meeting 3 - 10

B. Consideration of Planning Applications **Page**

1.	89 Crouch Hill London, N8 9EG	11 - 56
2.	92 & 94 Gifford Street, London, N1 0DF	57 - 74
3.	Catholic Church of The Sacred Heart Of Jesus, 64 Eden Grove London, N7 8EN	75 - 92
4.	IDT House, 44 Featherstone Street, Islington, London EC1Y 8RN	93 - 130
C.	Consideration of other planning matters	Page

D. Urgent non-exempt items (if any)

Any non-exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

E. Exclusion of press and public

To consider whether, in view of the nature of the remaining item on the agenda, it is likely to involve the disclosure of exempt or confidential information within the terms of the Access to Information Procedure Rules in the Constitution and, if so, whether to exclude the press and public during discussion thereof.

F. Confidential/exempt items **Page**

G. Urgent exempt items (if any)

Any exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

Date of Next Meeting: Planning Sub Committee A, 7 November 2019

Please note all committee agendas, reports and minutes are available on the council's website: www.democracy.islington.gov.uk

PROCEDURES FOR PLANNING SUB-COMMITTEES

Planning Sub-Committee Membership

Each Planning Sub-Committee consists of five locally elected members of the council who will decide on the applications for planning permission.

Order of Agenda

The Chair of the Planning Sub-Committee has discretion to bring forward items, or vary the order of the agenda, where there is a lot of public interest.

Consideration of the Application

After hearing from council officers about the main issues of the proposal and any information additional to the written report, the Chair will invite those objectors who have registered to speak for up to three minutes on any point relevant to the application. If more than one objector is present for any application then the Chair may request that a spokesperson should speak on behalf of all the objectors. The spokesperson should be selected before the meeting begins. The applicant will then be invited to address the meeting also for three minutes. These arrangements may be varied at the Chair's discretion.

Members of the Planning Sub-Committee will then discuss and vote to decide the application. The drawings forming the application are available for inspection by members during the discussion.

Please note that the Planning Committee will not be in a position to consider any additional material (e.g. further letters, plans, diagrams etc.) presented on that evening. Should you wish to provide any such information, please send this to the case officer a minimum of 24 hours before the meeting. If you submitted an objection but now feel that revisions or clarifications have addressed your earlier concerns, please write to inform us as soon as possible.

What Are Relevant Planning Objections?

The Planning Sub-Committee is required to decide on planning applications in accordance with the policies in the Development Plan unless there are compelling other reasons. The officer's report to the Planning Sub-Committee will refer to the relevant policies and evaluate the application against these policies. Loss of light, openness or privacy, disturbance to neighbouring properties from proposed intrusive uses, over development or the impact of proposed development in terms of size, scale, design or character on other buildings in the area, are relevant grounds for objection. Loss of property value, disturbance during building works and competition with existing uses are not. Loss of view is not a relevant ground for objection, however an unacceptable increase in sense of enclosure is.

For further information on how the Planning Sub-Committee operates and how to put your views to the Planning Sub-Committee please call Ola Adeoye/Zoe Lewis on 020 7527 3044/3486. If you wish to speak at the meeting please register by calling the Planning Department on 020 7527 2278 or emailing enquiriesplanning@islington.gov.uk.

COMMITTEE AGENDA

1 89 Crouch Hill
London
N8 9EG

2 92 & 94 Gifford Street
London
N1 0DF

3 Catholic Church Of The Sacred Heart Of Jesus, 64 Eden Grove
London, N7 8EN

4 IDT House
44 Featherstone Street
Islington
London
EC1Y 8RN

1 89 Crouch Hill
London
N8 9EG

Application Number: P2018/3775/FUL

Ward: Hillrise

Proposed Development: Change of use of a hotel (Use Class C1) with accommodation for 12 bedrooms into 5 no. self-contained residential units (Use Class C3); erection of two storey side and rear extensions with associated internal reconfiguration including basement excavation to provide habitable rooms as well as provision of associated cycle storage and refuse facilities.

Application Type: Full Planning Application

Case Officer: Sandra Chivero

Name of Applicant: Ms Elena Chrysostomou

Recommendation:

2 92 & 94 Gifford Street
London
N1 0DF

Application Number: P2019/1996/FUL

Ward: Caledonian

Proposed Development: Erection of mansard roof extensions with dormers above the existing butterfly roofs at nos. 92 and 94, and associated raising of party walls and chimney stacks. Reinstatement of timber sash window to rear second floor level elevation and rear ground floor fenestration changes at no. 94.

Application Type: Full Planning Application

Case Officer: Nathan Stringer
Name of Applicant: Mr Paul Convery
Recommendation:

**3 Catholic Church Of The Sacred Heart Of Jesus, 64 Eden Grove
London, N7 8EN**

Application Number: P2018/1453/FUL
Ward: Holloway
Proposed Development: Construction of a tower over the existing listed church building.
Re-consultation due to: the scheme was amended, new information submitted,
Application Type: Full Planning Application
Case Officer: Rebecca Neil
Name of Applicant: Westminster RC Diocese Trustee
Recommendation:

**4 IDT House
44 Featherstone Street
Islington
London
EC1Y 8RN**

Application Number: P2019/0183/FUL
Ward: Bunhill
Proposed Development: Single-storey extension and partial infill of lightwell to the rear of the existing building and
internal and external refurbishments to provide additional B1 floorspace and new facade
appearance.
Application Type: Full Planning Application
Case Officer: Owen Griffiths
Name of Applicant: C/O Agent
Recommendation:

London Borough of Islington

Planning Sub Committee A - 18 June 2019

Minutes of the meeting of the Planning Sub Committee A held at Committee Room 1, Town Hall, Upper Street, N1 2UD - Islington Town Hall on 18 June 2019 at 7.30 pm.

Present: **Councillors:** Picknell (Chair), Convery, Clarke, Graham and Mackmurdie

Councillor Angela Picknell in the Chair

63 **INTRODUCTIONS (Item A1)**

Councillor Picknell welcomed everyone to the meeting. Members of the Committee and officers introduced themselves.

64 **APOLOGIES FOR ABSENCE (Item A2)**

There were no apologies for absence.

65 **DECLARATIONS OF SUBSTITUTE MEMBERS (Item A3)**

There were no declarations of substitute members.

66 **DECLARATIONS OF INTEREST (Item A4)**

Councillors Mackmurdie declared a personal interest in item B1-1 Berry Place and Councillor Convery declared a personal interest in B2-10 Kiver Road.

Both Councillors Mackmurdie and Convery were not involved in the deliberation and decision making of the applications which they had declared their personal interests having left the meeting room.

67 **ORDER OF BUSINESS (Item A5)**

The order of business would be B3,B1,B4 and B2.

68 **MINUTES OF PREVIOUS MEETING (Item A6)**

RESOLVED:

That the minutes of the meeting held on 9 April 2019 be confirmed as an accurate record of proceedings and the Chair be authorised to sign them.

69 **1 BERRY PLACE, EC1V 0JD (Item B1)**

Installation of plant equipment (9 no. units) above existing flat roof at second floor level (first floor roof) including associated screening enclosures and other works.
(Planning application number: P2018/4155/FUL)

Planning Sub Committee A - 18 June 2019

In the discussion the following points were made:

- Planning Officer informed the meeting that the description under image 3 on page 9 which reads the following wording - 'which has now been removed following enforcement investigation' be deleted as it is incorrect.
- Members were reminded that the application was due to an enforcement action following the unauthorised installation of air conditioning equipment to the main roof, however this has now been removed. The Planning Officer advised that the plant equipment at second floor remains in situ, as the applicant had submitted an appeal.
- Members were advised that the position of the proposed air conditioning units above the flat roof of the two storey building is acceptable as the units are set in from the south and east elevations which ensures that any views from the public realm is largely obscured with the only views possible from the public realm to the west.
- An objector was concerned about one air conditioning unit operating 24 hours a day, 7 days a week and regarded the mitigation proposal as insufficient to address the noise levels especially as it had not been tested. The objector queried the hours of operation of the other 8 air conditioning units as proposed by the applicant, requesting that the times to reflect what was stipulated in the previous application of 8.00am to 8.00pm instead of the 6.30am to 8.00pm be restored.
- Members proposed to revise condition 8 to allow the use of a timer to control the operation of the 7 air source heat pumps and 1 air conditioning unit between the hours of 08.am and 20.00pm Monday to Fridays only.
- Objector was concerned with the inaccurate noise report submitted by the applicant and the measurement of background sounds as not a fair reflection of the current situation and the construction work in the surrounding area. There was also concern about the air conditioning units be in operation over the weekend when the office is closed.
- In response to noise concerns and its impact on the amenity of neighbouring residents, the agent informed members that only 1 out of the 9 air conditioning units would be in operation for 24hours and although placed in an acoustic enclosure, the units will be emitting 5 decibels lesser than the required noise levels.
- On the issue for the need of air conditioning units being used for 24 hours, the agent advised that the parent company is based in Australia hence the need to have skeletal staff to manage the London office and its servers.
- Members enquired about the proposed operating hours for of the units and in particular on the weekend.
- Councillor Clarke proposed a motion that the operating hours be amended to read from 8.00am to 8.00pm, Monday to Friday. Councillor Graham seconded the motion and it was carried.
- With regards to the post installation noise report, the agent reassured members that if the tests confirm that the air conditioning unit is not in compliance of the required noise levels, the air conditioning units would be switched off.
- Members requested condition 7 be reworded, to be specific in terms of the timetable for the noise report to be submitted and it being to be enforced. Members agreed

that condition 7 be amended, the exact wording to be delegated to the planning officer and the Chair.

- In response to a question about the existing unauthorised plant equipment which is presently subject to an enforcement appeal, the agent acknowledged that the unit would be removed within 1 month of the planning permission being granted.

RESOLVED:

That following consideration of the case officer's report (the assessment and recommendations therein), the presentation to Committee, submitted representations and objections provided verbally at this meeting, planning permission be granted subject to the amended conditions above and the prior withdrawal of enforcement appeal as mentioned above.

Revised Condition 7 Post Installation Noise Report: Within 6 months of the installation of the hereby approved plant equipment a report is to be commissioned by the applicant, using an appropriately experienced & competent person, to assess the noise from the proposed mechanical plant to demonstrate compliance with condition 6. The report shall include site measurements of the plant insitu. The report shall be submitted to and approved in writing by the Local Planning Authority and any noise mitigation measures shall be installed before commencement of the development hereby permitted and permanently retained thereafter into perpetuity.

In the event that the submitted information identifies that the noise levels exceed the limits identified within condition 6, the use of the equipment shall cease, until such time following formal confirmation from the Local Planning Authority that any remediation measures supplied by the applicant demonstrate compliance.

REASON: In order to protect the amenity of neighbouring properties in terms of noise.

Revised Condition 8 Installation of timer: Prior to the hereby approved plant equipment being used, a timer shall be installed limiting the operation of the 7 no. air source pumps (Mitsubishi Y Series (PUMY-SP112 – 12.5-15.5KW) units) and 1 no. outdoor air conditioning unit (Daikin Split Sky Air (RZQSG1009V1) between the hours of 08:00 to 20:00 Monday to Friday only. The timer shall be maintained as such thereafter into perpetuity.

REASON: In order to protect the amenity of neighbouring properties in terms of noise

70

10 KIVER ROAD, N19 4PD (Item B2)

Erection of mansard roof extension with 2no. dormers to the front and rear elevations.
Erection of a single storey rear ground floor extension with a glazed roof and associated alterations.

(Planning application number: P2019/1016/FUL)

In the discussion the following points were made:

- The Planning Officer advised the meeting that item is before Committee as the applicant is a ward councillor. Members were advised that no objections had been received.
- The Planning Officer advised that the proposed extension remains subordinate to and preserves the scale and integrity of the original building. Members were advised

that the extension is of an acceptable scale and appearance and not visible from the public realm.

- The meeting was advised that the proposal is not considered to prejudice the residential amenity of neighbouring amenity and not contrary to policy DM2.1 of the Islington Development Management Policies June 2013.
- With regards to subsidence concerns raised by neighbours, the meeting was advised that party wall issues are a civil matter and are not a material planning consideration.
- In response to concerns that the proposal will be setting a precedent, the Planning Officer advised that with regard to rooflines outside conservation areas, paragraph 5.153 of the Islington Urban Design Guide 2017 states that there is more scope to introduce roof extensions where it is high quality design.

RESOLVED:

That following consideration of the case officer's report (the assessment and recommendations therein), the presentation to Committee, submitted representations at this meeting, planning permission be granted subject to the conditions and set out in Appendix 1 of the officer report.

71

42 GLOUCESTER WAY, EC1R 0BR (Item B3)

Erection of an additional storey above the existing roof level to allow additional B1 office floorspace, and associated alterations.

(Planning application number: P2018/2849/FUL)

In the discussion the following points were made:

- The Planning Officer advised members that no additional updates had been received since the publication of the agenda.
- The meeting was informed that results from the submitted daylight assessment indicate that where losses did occur it was acceptable and within the BRE Guidelines. Members were informed that it was noticeable that windows located in proximity to the application site such as No.27 and No.28 Myddelton Street would not be unreasonably impacted beyond its existing situation.
- An objector was concerned that the proposal would impact the amenity of neighbouring properties; overlooking concerns with regards to the communal gardens and their loss of privacy; daylight sunlight loss and the historical impact on the character of the property and surrounds.
- In response to objectors concerns about loss of privacy, the agent advised that condition 10 provides details of the visual privacy screening which will be submitted for approval and prior to it being used and condition 11 will restrict the hours of operation of the roof terrace.
- Members welcomed the design and importantly applicant's decision to use similar brickwork to match the existing appearance of the building, however concerns were raised about the purpose of the roof terrace despite the proposed hours of operation as noted in condition 11. Members acknowledged the sunlight and daylight loss concerns but regarded it as not significant to affect neighbouring amenity.

- Members were concerned with the roof terrace and its use by office employees and the difficulty of monitoring and enforcing its use. Members noted the screening details, however suggested that notwithstanding a new condition be included stating that both the roof terrace and flat roof areas at rear first and second floor level cannot be used as roof terraces or sitting out spaces other than for essential maintenance or repair, or escape in case of emergency.
- Members agreed suggested condition 10 (details of screening) and Condition 11 (hours of use/operation for the terrace) should be deleted.
- Councillor Convery proposed a motion to include a condition which restricts the use of both the roof terrace and the flat roof as amenity space. This was seconded by Councillor Mackmurdie and carried.

ADDITIONAL CONDITION RESTRICTING USE OF REAR FLAT ROOF AREAS:
Notwithstanding the hereby approved plans including drawing numbers 17.235.102 Existing and Proposed 1st Floor Plan, 17.235.103 Existing and Proposed 2nd Floor Plan & 17.235.104 Existing and Proposed Roof Plan no permission is granted for any use of the rear flat roof areas at first and second floor levels as any form of amenity or sitting out space of any kind whatsoever and shall not be used other than for essential maintenance or repair, or escape in case of emergency.

REASON: To prevent the undue overlooking, loss of privacy and noise and disturbances to adjoining residential properties.

RESOLVED:

That following consideration of the case officer's report (the assessment and recommendations therein), the presentation to Committee, submitted representations and objections provided verbally at this meeting, planning permission be granted subject to the conditions, and informatives set out in Appendix 1 of the officer report with the deletion of suggested conditions 10 & 11 and an additional condition as stated above.

72

73 FAIRBRIDGE ROAD, N19 3EP (Item B4)

Retrospective application to change the use of the property from a single dwelling house (C3 use) to be retained as a mixed use; comprising of residential (C3) & childcare(D1) uses for a temporary period of 2 years.

(Planning application number: P2019/0223/FUL)

In the discussion the following points were made:

- Planning officer informed the meeting that condition 3 of the report relating to hours of operation should read 07.30 to 18.00 hours and not 09.00 to 18.00 hours.
- The Planning Officer advised members that the application had been submitted as a result of an enforcement investigation following a complaint raised about the unauthorised use of the property. Members were reminded that the existing childcare facilities had been operational since August 2009 and its present use would be immune from enforcement action in the event of it still being operational by August 2019.
- Members were informed that although the loss of the existing residential floor space would not be acceptable in land use terms, the introduction of a child care facility and loss of the pre-existing residential use is considered on balance to be

Planning Sub Committee A - 18 June 2019

acceptable

- The Planning Officer informed members that the proposal will allow the applicant seek alternative locations for the childcare facilities, after which the host property would be reinstated to a single dwelling house.
- The applicant informed the Committee that she was in the process of looking for alternative locations for the existing child care facility, were hoping to hire a hall and were actually in the process of downsizing the scale of the facility.
- Members welcomed Ofsted's high rating, but noted that the provision of child care in this location amounts to a loss of residential floor space which is contrary to the Council policies.
- A suggestion for an informative be included in the permission stating that the child care facility be limited to a 2-year period after which it will revert back to being a single dwelling was noted. Members agreed that the exact wording of the informative be delegated to the planning officer and the Chair.
- Officers advised members to correct a typo in condition 3 controlling the hours of use of the nursery to change from the report which stated to begin at 9am and to replace this time with 07.30 am to 18.00pm Monday to Fridays.
- In response to issues of noise disturbance to neighbouring properties and the use of rear garden, the planning officer informed the meeting that conditions 3 and 4 in the report addresses those concerns.

Councillor Convery proposed a motion to include an informative stating the temporary nature of the permission granted. This was seconded by Councillor Graham and carried.

RESOLVED:

That following consideration of the case officer's report (the assessment and recommendations therein), the presentation to Committee, submitted representations planning permission be granted subject to the conditions set out in Appendix 1 of the officer report and an informative to be included as stated above, the wording of which is to be delegated to officers and the Chair.

CONDITION 03 amended re hours: The hereby approved childcare facility shall only operate Monday to Fridays between 07.30am to 18.00pm hours. The operation of the host building as a childcare facility shall not operate outside of these approved hours.

REASON: In the interest of securing sustainable development and to ensure that the resulting appearance and construction of the development is of a high standard.

Informative wording: The applicant's attention is drawn to the fact that the council only considers a two-year temporary permission to be acceptable in this case as the development is contrary to the council's planning policies to safeguard existing residential floorspace. Members did however consider its function as a useful facility for childcare in the area and consider that two years is an appropriate timeframe for an alternative premise(s) to be sought for the facility in the short to medium term.

The meeting ended at 9.15 pm

CHAIR

This page is intentionally left blank

PLANNING COMMITTEE REPORT

Development Management Service
 Planning and Development Division
 Environment and Regeneration Department

PLANNING SUB-COMMITTEE A		AGENDA ITEM NO:B1
Date:	03 September 2019	NON-EXEMPT

Application number	P2018/3775/FUL
Application type	Full Planning Application
Ward	Hillrise
Listed building	Not listed
Conservation area	Not located in a Conservation Area
Development Plan Context	Major Cycle Route Alexandra Palace viewing terrace to St Paul's Cathedral Article 4 Direction A1 – A2 (Rest of Borough)
Licensing Implications	No
Site Address	89 Crouch Hill London N8 9EG
Proposal	Change of use of a hotel (Use Class C1) with accommodation for 12 bedrooms into 5 no. self-contained residential units (Use Class C3); with associated external works consisting of erection of a replacement larger two storey rear extension and a replacement larger two-storey side extension in place of an existing single storey side conservatory; creation of a new window opening to the existing front dormer; erection of a new rear dormer and replacement dormer and insertion of 1 no. new replacement rooflight to rear roof slope; creation of a refuse and cycle store within the existing garage, creation of terraces at ground, first and roof level with associated metal railings (balustrades); landscaping works; basement excavation and creation of front and rear lightwells.

Case Officer	Sandra Chivero
Applicant	Ms Elena Chrysostomou
Agent	Mr Peter Koumis - Vivendi Architects LTD

1. RECOMMENDATION

- 1.1 The Committee is asked to resolve to **GRANT** planning permission – subject to
- i) Conditions set out in Appendix 1; and

- ii) 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.

2. SITE PLAN



3. PHOTOS OF SITE AND STREET

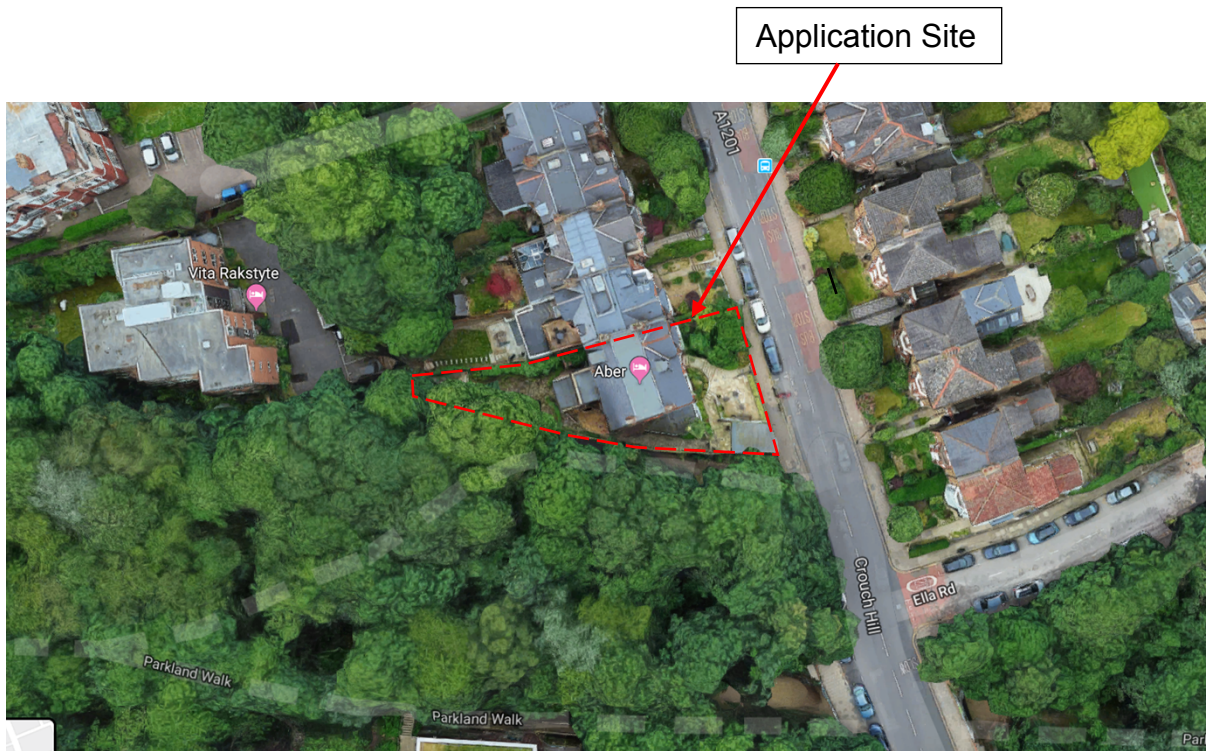


Image 1: Aerial View of the Application Site



Image 2: Photograph from street level showing the front elevation



Image 3: Photograph of the rear elevation

4. SUMMARY

- 4.1 Planning permission is sought for the change of use of a hotel (Use Class C1) with accommodation for 12 bedrooms into 5 no. self-contained residential units (Use Class C3); erection of a two storey side and rear extensions with associated internal reconfiguration including basement excavation to provide habitable rooms as well as provision of associated cycle storage and refuse facilities.
- 4.2 The site is not located in an area considered appropriate for visitor accommodation and is not attached to an existing public house. It is not considered that there is any policy basis for the retention of a hotel. The application site is located in an area with a high level of residential accommodation and as such, the proposal to change the hotel to self-contained residential units is considered acceptable in land use terms.
- 4.3 Taking the proposed alterations together, these are not considered to cause material harm to the appearance of the host building or the wider terrace. The proposed basement demonstrates an appropriate scale of development that would not project beyond the above ground footprint (with the exception of lightwells) and which reflects the site coverage of the surrounding development patterns.
- 4.4 The information received shows the impacts on off-site trees should be minimal. However, due to the close proximity of the development to off-site trees it will be an essential requirement of the project to have arboricultural input and supervision from detailed design through to completion. This has been secured by condition.
- 4.5 The information provided in support of the application, along with information required by condition, is considered to demonstrate and ensure that the proposed development will preserve the residential amenities of the nearby properties and the proposed dwellings within the development scheme. The quality of resulting accommodation is also considered to be satisfactory.

- 4.6 The internal Viability Team agreed with Adams Integra's conclusion that the application cannot viably provide the full required Small Sites affordable housing contribution of £250,000, but can provide a partial contribution of £83,411. The applicant has stated their willingness to enter into a Unilateral Undertaking in respect of the above sums.
- 4.7 Overall, the proposed development is considered to accord with the National Planning Policy Framework 2018, and the policies found within the London Plan 2016, the Islington Core Strategy 2011, the Development Management Policies 2013 and Supplementary Planning Documents.

5. SITE AND SURROUNDING

- 5.1 The application site is occupied by a two-storey red brick double fronted end of terrace property currently in use as a 12-bedroom hotel and comprises of a single storey side conservatory. The host building sits on an elevated position (approximately 3m higher than the pavement) on the western side of Crouch Hill. The site also hosts a single garage positioned to the front of the boundary.
- 5.2 The existing building is not listed and it is not located within a designated conservation area. The surrounding area is predominantly residential in character. To the north the application site adjoins a two-storey dwelling house of similar architectural style. To the south the site abuts an access road leading to the block of flats situated to the rear western side of the site. To the east the site fronts on to three-storey linked semi-detached villas.
- 5.3 The tree covered Park Land Walk Local Nature Reserve and Cape Adventure Playground is also situated to the south of the site. This area is also designated as Metropolitan Open Land (MOL1), Open Space (OS125) and Site of Importance for Nature Conservation (SINC) (44).

6. PROPOSAL (IN DETAIL)

- 6.1 Planning permission is sought for the change of use of a hotel (C1 Use) with accommodation for 12 bedrooms into 5 self-contained residential units (C3 Use) comprising of 2no. three-bed, 2no. two-bed and 1no. one-bed with associated external works consisting of erection of a replacement larger two storey rear extension and a replacement larger two-storey side extension in place of an existing single storey side conservatory; creation of a new window opening the to existing front dormer; erection of a new rear dormer and replacement dormer and insertion of 1 no. new replacement rooflight to rear roof slope; creation of a refuse and cycle store within the existing garage, creation of terraces at ground, first and roof level with associated metal railings (balustrades); landscaping works; basement excavation and creation of front and rear lightwells.

Revisions

- 6.2 During the course of the application amended drawings were received showing:
- Rooflights to the main roof omitted from the proposal and the proposed rooflights to the rear elevation above stair core would be conservation grade with roof tiles
 - Reduction of width of rear dormers by 200mm

6.3 As these alterations are considered relatively minor and reduce are not considered to prejudice neighbouring occupiers, these alterations have been taken into account within the assessment of the application.

7. PLANNING HISTORY:

- a. January 2015: Planning Application (Ref. P2014/3126/FUL) Granted for Demolition of existing garage and construction of new garage, metal railing to front garden

PRE-APPLICATION ADVICE:

7.2 February 2018: - Pre-application (Q2018/0031/MIN) related to the change of use of a hotel to 5no. self-contained residential units; erection of side and rear extensions with associated internal reconfiguration including basement excavations. Officer Response: stated that it was not considered that there was any policy basis for the retention of a hotel and the change of use to self-contained residential units was considered acceptable in land use terms. However, concerns were raised regarding the mass, scale, bulk and design of the proposed three storey rear extension, which was not considered to be subordinate to the main property. It was advised that the principle of a two storey rear extension is acceptable, subject to impact on neighbouring amenity. There were also concerns raised regarding poor outlook from the main living space of Flat 1 whose main outlook would be onto the basement lightwell. Further concerns were raised regarding the second floor rear terrace in terms of the design and potential loss of privacy to adjoining occupiers. No objections were raised to the principle of a terrace on the second floor side elevation, subject to it being recessed further back from the front building line than as existing. It was also considered that the proposed basements demonstrate an appropriate scale of development that would not project beyond the above ground footprint (with the exception of lightwells) and which reflects the site coverage of the surrounding development patterns. It was recommended to take into consideration the issues raised above prior to submitting a formal planning application.

ENFORCEMENT:

- 7.3 October 2016: Enforcement Case (Ref. E/2016/0224) relating to the erection of lighting-columns without permission Closed. The Enforcement Officer advised that it was considered that no harm would be caused to the surrounding area and it was not considered expedient to pursue further.
- 7.4 September 2015: Enforcement Case (Ref. E/2014/0232) relating to new garage Closed. It is stated that planning permission was granted on 7 January 2015 for the demolition of the garage and the erection of a new one. As such, the breach has been regularised and the works are now permitted.
- 7.5 March 2006: Enforcement Case (Ref. E010533) relating to Installation of two illuminated signs advertising hotel and six garden light Closed. The Enforcement Officer advised that no notes or copy of notice are available on file.

8. CONSULTATION

Public Consultation

8.1 Letters were sent to occupants of 86 adjoining and nearby properties on 07 January 2019. A site notice was displayed outside the site, and a press notice was displayed. The public consultation of the application expired on 03 February 2019.

8.2 At the time of writing this report 9 no. letters of representation had been received from the public with regard to the application. The issues raised can be summarised as follows (including corresponding paragraphs in this report addressing the issues in brackets):

- Loss of privacy and overlooking (Paragraph 10.41)
- Loss of light (Paragraphs 10.42, 10.43)
- Proposal does not maintain the natural alignment of housing (Paragraph 10.14)
- Proposal out of keeping with the design of other housing in the area none have balconies (Paragraph 10.13)
- Balconies would create an eyesore (Paragraph 10.15)
- Rear extension excessive (Paragraph 10.13, 10.14, 10.15)
- Basement extension excessive (Paragraph 10.45 – 10.54)
- Disturbance to water table (Paragraph 10.53)
- Parking issues (Paragraph 10.62)
- Impact on trees (Paragraph 10.55-10.59)
- Lack of nesting locations for swifts and bats (Paragraph 10.84)

Non-Material

- Obstruction to view of park (Paragraph 10.81)
- Structural problems (Paragraph 10.47, 10.49)
- Dust and noise pollution during building works (Paragraph 10.82)
- Disruption and traffic during building works (Paragraph 10.82)

Internal Consultees

8.3 Design & Conservation: The Design and Conservation Officer stated that the previous pre-application enquiry Ref. P2018/0031/MIN was largely regarded under this application and the proposals are consequently acceptable in design terms. Looking at the submitted drawings under the current application concerns were raised in relation to the proposed 3 new rooflights which did not form part of the pre-application proposal. The proposed rooflight to the staircase is acceptable, but not those proposed for the rear bedroom and living room of proposed Flat 5. It was further stated that the rebuilding of the existing rear dormer and the construction of the proposed rear dormer is acceptable in principle, but the window openings should not exceed the proportions of the existing rear dormer.

8.4 The Design and Conservation Officer also noted that the excavation of the proposed lightwells was subject to pre-application advice and is acceptable in principle. However, stated that the proposed guard railings risk introducing visual clutter into the streetscene, and as the lightwells could be made secure by concealed grills it was recommended that they are omitted from the proposal.

8.5 It was noted that the proposed terraces have been revised in line with pre-application advice. It was requested that further information should be provided on the proposed finish of the doors leading to the former garage now proposed for use as a refuse/ bicycle store.

- 8.6 Amended drawings addressing the concerns raised by the Design and Conservation Officer were received during the course of the application. The Design and Conservation Officer was largely satisfied with the amendments and maintained that the metal railings to the lightwell are not ideal but raised no further objections.
- 8.7 Viability Officer stated that having reviewed the appraisal inputs adopted by Adams Integra, it was agreed that these are all reasonable assumptions. It was noted that the proposed development's viability is constrained by high build costs due to the extensive basement works and the high Benchmark Land Value of £1,800,000. Additionally, the achievable sales values are lower due to the subject site being in the north of the borough where sales values are typically lower. The lower sales values when combined with the high build costs and the site's high existing use value as a functioning hotel have led to a reduction in viability. This decline in viability has resulted in a reduced affordable housing contribution.
- 8.8 In view of this the Viability officer agreed with Adams Integra's conclusion that the application cannot viably provide the full required Small Sites affordable housing contribution of £250,000, but can provide a partial contribution of £83,411.
- 8.9 Inclusive Design Officer commented that the site has a rating of 3 (moderate) which does not suggest that the site is well connected and in any event the rating takes no account of the inaccessibility of various modes of transport to disabled people. It is highlighted that all new residential units should meet the standards associated with category 2 housing.
- 8.10 The Inclusive Design Officer considers that overall the ground floor units can be delivered as step free then the development will have made a reasonable contribution to the stock of flexible homes in the borough.
- 8.11 Trees Officer noted that the proposed development will involve the removal of two low quality trees, all other trees including those protected by a Tree Preservation Order will be retained and protected. The current basement / floor plan foot prints appear to follow those provided at the pre-application stage therefore my opinion of the tree impacts remains is also similar.
- 8.12 The excavation required for the basement and extension equates to a new incursion of approx. 2% within the RPA of (T1) however this is minimal and should not have a significant impact on important trees.
- 8.13 The Tree Officer does not object as long as the recommendations contained within The arboricultural method statement report and the tree protection plans for demolition and construction submitted in support of the application are adhered to in full. To compliance a Tree Protection Condition has also been recommended to be attached to the application (Please see Condition 11).

External Consultees

- 8.14 **Adams Integra** stated that the approach taken in the financial viability appraisal study follows the well-recognised methodology of residual land valuation (RLV). Put simply the residual land value produced by a potential development is calculated by subtracting the costs of achieving that development from the revenue generated by the completed scheme. The results of the RLV were then compared to the benchmark land value (BLV). If the RLV is more than the EUV then the scheme produces a surplus and is viable if not, then there is a deficit and the scheme is not viable.

- 8.15 A HCA DAT appraisal of the current scheme using the input values including the required £250,000 affordable housing contribution was carried out. The appraisal, produced a residual land value of £1,646,992. When compared to the “benchmark value” of £1,800,000 this resulted in a deficit of £153,008 demonstrating that the scheme is not viable at a profit level of 15%. The affordable housing contribution until the residual land value reached the benchmark land value of £1,800,000 was then reduced. This appraisal can be found at Appendix 1A of their report and shows an affordable housing contribution of £83,411 can be viably provided.
- 8.16 Adams Integra asserted that this appraisal demonstrated that the scheme is able to support an affordable housing contribution of £83,411 and remain viable. It is confirmed that the scheme has been looked at in terms of its particular financial characteristics and it represents no precedent for any sustainable approach on the Council’s policy base. This report is attached in Appendix 3 of this report.

9. RELEVANT STATUTORY DUTIES & DEVELOPMENT PLAN CONSIDERATIONS & POLICIES

- 9.1 Islington Council (Planning Sub-Committee A), in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004) (Note: that the relevant Development Plan is the London Plan and Islington’s Local Plan, including adopted Supplementary Planning Guidance.)
- 9.2 National Planning Policy Framework (NPPF) (2019): Paragraphs 10 and 11 state that at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means: approving development proposals that accord with the development plan without delay.
- 9.3 At paragraph 8 the NPPF (2019) states that achieving sustainable development means that the planning system has three overarching objectives namely economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- 9.4 The updated National Planning Policy Framework 2018 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.

- 9.5 Since March 2014 Planning Practice Guidance for England has been published online.
- 9.6 In considering the planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
- 9.7 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:
- Article 1 of the First Protocol: Protection of property. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.
 - Article 14: Prohibition of discrimination. The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.
- 9.8 Members of the Planning Sub-Committee must be aware of the rights contained in the Convention (particularly those set out above) when making any Planning decisions. However, most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted. Any interference with any of the rights contained in the Convention must be sanctioned by law and be aimed at pursuing a legitimate aim and must go no further than is necessary and be proportionate.
- 9.9 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. The Committee must be mindful of this duty inter alia when determining all planning applications. In particular, the Committee must pay due regard to the need to: (1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Development Plan

- 9.10 The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013 and the Finsbury Local Plan 2013. The policies of the Development Plan that are considered relevant to this application are listed at Appendix 2 to this report.
- 9.11 Some weight is attributed to the Draft London Plan Policies.

9.12 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:

- Major Cycle Route
- Alexandra Palace viewing terrace to St Paul's Cathedral
- Article 4 Direction A1 – A2 (Rest of Borough)

9.13 The following designations relate to the Parkland Walk, immediately to the south of the site

- Metropolitan Open Land (MOL1)
- Open Space (OS125)
- Site of Importance for Nature Conservation (44).

Supplementary Planning Guidance (SPG) / Document (SPD)

9.14 The SPGs and/or SPDs which are considered relevant are listed in Appendix 2.

10. ASSESSMENT

10.1 The main issues arising from this proposal relate to:

- Land Use
- Design
- Unit Mix
- Quality of Resulting Residential Accommodation
- Accessibility
- Neighbouring Amenity
- Basement Development
- Trees
- SINC and Open Space
- Highways and Transportation
- Refuse and Recycling
- Small Site Affordable Housing Contributions
- Community Infrastructure Levy
- Other matters

LAND-USE

10.2 The proposal relates to the change of use of a hotel (Use Class C1) with accommodation for 12 bedrooms into 5 no. self-contained residential units (Use Class C3). The Council's own investigation suggest that the existing hotel use is lawful. The Enforcement Case (Ref. E010533) closed on March 2006 refers to the installation of illuminated signs advertising a hotel at the application site. Google streetview images also show the hotel in existence in 2008.

10.3 The application site is not located in a town centre location, within the Central Activities Zone and does not have access to good transport links. The Islington Development Management Policies does not have a policy against the loss of hotel accommodation. Policy DM4.11 provides information regarding new hotel and visitor accommodation and operates on a locational hierarchy. The priority for new hotel accommodation is in designated town centres, the Central Activities Zone and more specifically the City

Fringe Opportunity Area. Alternatively, small scale accommodation that is ancillary to existing public houses would be supported.

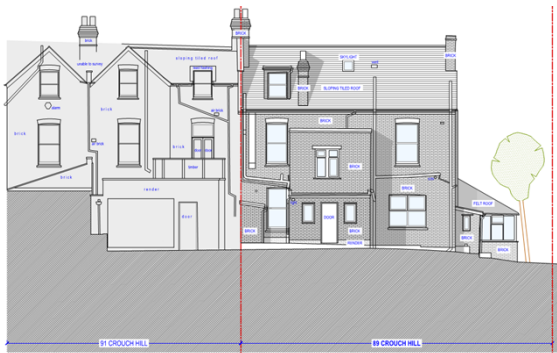
- 10.4 As noted above, the site is not located in an area considered appropriate for visitor accommodation and is not attached to an existing public house. Furthermore, the site is not considered to be in an accessible location with a PTAL rating of 3, which is low for Islington. As such there is no policy protection for a hotel. The application site is located in an area with a high level of residential accommodation and as such, the proposal to change the hotel use to self-contained residential units is considered acceptable in land use terms.
- 10.5 Paragraph 49 of the NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. Local planning authorities should normally approve applications for residential development, provided that there are not strong economic reasons why such development would be inappropriate.
- 10.6 Core Strategy Policy CS12 'Meeting the housing challenge' seeks to ensure that the Borough has a continuous supply of housing to meet London Plan targets. London Plan Policy 3.4 (and table 3.2) seeks to maximise the supply of additional homes in line with the London Plan's guidelines on density, having regard to the site's characteristics in terms of urban design, local services and public transport, and neighbour amenity.
- 10.7 It is therefore the case that there is a policy presumption in favour of the delivery of new housing, and the site is considered to be a sustainable location for new housing. The scheme would deliver 5 residential units which would contribute towards the Borough's targets. Subject to compliance with other policies, the introduction of residential units at this windfall site is supported in principle.

DESIGN & CHARACTER AND APPEARANCE

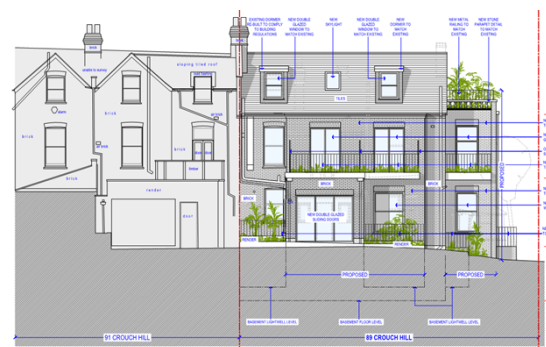
- 10.8 In policy terms, London Plan Policy 7.6 states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It goes on to set out criteria against which planning applications should be assessed, stating that buildings should be of the highest architectural quality, should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.
- 10.9 Policy CS9 of Islington's Core Strategy deals with protecting and enhancing Islington's built environment and requires new buildings to be sympathetic in scale and appearance and to be complementary to the local identity. Policy DM2.1 of Islington's Development Management Policies state that all forms of development are required to be of high quality, incorporate inclusive design principles and make a positive contribution to the local character and distinctiveness of an area, based upon an understanding and evaluation of its defining characteristics.
- 10.10 The UDG accepts that there is greater scope for introducing well designed roof extensions outside of conservation areas and confirms the importance of the roofline to the rhythm and unity of a residential terrace or street. It is further stated that *in all cases, applications for roof extensions, dormers and rooflights will be assessed on merit, giving due consideration to the quality of design, materials and construction proposed and the cumulative effect on visual amenity, unity and coherence of the streetscene.*

Dormers and Rooflights

- 10.11 The rear terrace at roof level that was previously proposed at the pre-application stage has been replaced with two dormer windows. The existing rear dormer is rebuilt slightly wider and a second dormer is introduced to the rear roof slope. The proposed alterations at roof level (dormers and rooflights) have been amended during the process of the application to address the concerns raised by the Design and Conservation Officer. The amended drawings show the overall window size of the dormers reduced to match the existing one. The overall size of the dormer cheeks will be slightly wider than the existing in order to meet with current building regulations. The amended drawings also show the rooflights to the main roof of the rear bedroom and living room to Flat 5 omitted from the proposal. The remaining proposed rooflight to the rear elevation above the staircore will be a conservation style rooflight flush with the roof (please see Condition 4).
- 10.12 The omission of the rooflights to the main roof serving the rear bedroom and living room to Flat 5 is welcome. The replacement of the single rooflight flush with the roof is considered sympathetic to the architectural character of the host building. Given the instances of rear dormers within the terrace, including one at the adjoining property and the application site, the introduction of a dormer of similar size and design to this end property (which is wider than the rest of the terrace) is not considered to undermine the rhythm of the roofline of the terrace. As such, the proposed dormer extension would not be harmful to the intrinsic character and appearance of this section of Crouch Hill. Moreover, the rear dormers would not be visible from street level and would therefore be considered acceptable in that regard. It is acknowledged that the proposal would be visible in views from the rear. However, given the instances of dormers at roof level within the terrace it is not considered that the proposal would unacceptably disrupt the unity of the roofscape at the rear of the properties. Therefore, it is considered there is no material harm to the character and appearance of either the host building or host terrace.



Existing Rear Elevation



Proposed Rear Elevation

Side and Rear Extensions

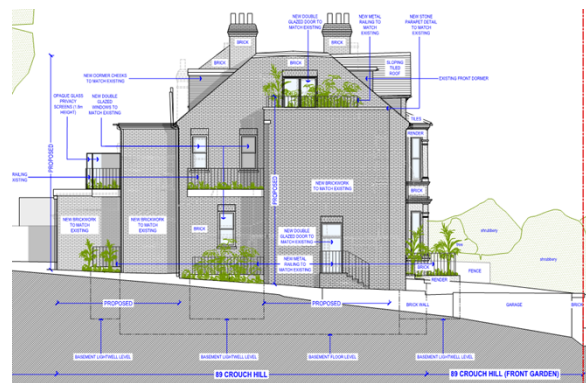
- 10.13 At the pre-application stage concerns were raised regarding the mass, scale and bulk and design of the proposed three storey rear extension not being subordinate to the main property. It was considered that a two storey rear extension would be acceptable subject to not unacceptably impacting on the neighbour's amenity. Under the current application, it proposed to erect side and rear extensions. The rear extension has been redesigned so as to be ground and first floor only with a flat roof.

10.14 Concerns have been raised regarding the proposals failing to maintain the natural alignment of house and that the balconies would be out of keeping with design of other housing in the area. The wider terrace within which the site is located has been the subject of various additions and alterations at the rear. The proposed replacement two-storey side extension would not be wider than the footprint of the existing single storey side extension and would not extend the full depth of the host building, the rear extension would not result in a full width extension and both side and rear extensions would be restricted to two storeys. This along with the design is considered to maintain a sense of subservience to the existing building and that of the wider terrace.

10.15 In addition, due to materials, design and appearance the proposed side and rear extensions including associated terraces are considered sympathetic to the host building constructed of traditional materials. The terrace above the side extension is in a setback position (2.5m from the front building line and 8 m from the street) and would not be prominent from public views and would not create an eyesore. It is therefore not considered detract from the character of the host terrace.



Existing Side Elevation



Proposed Side Elevation



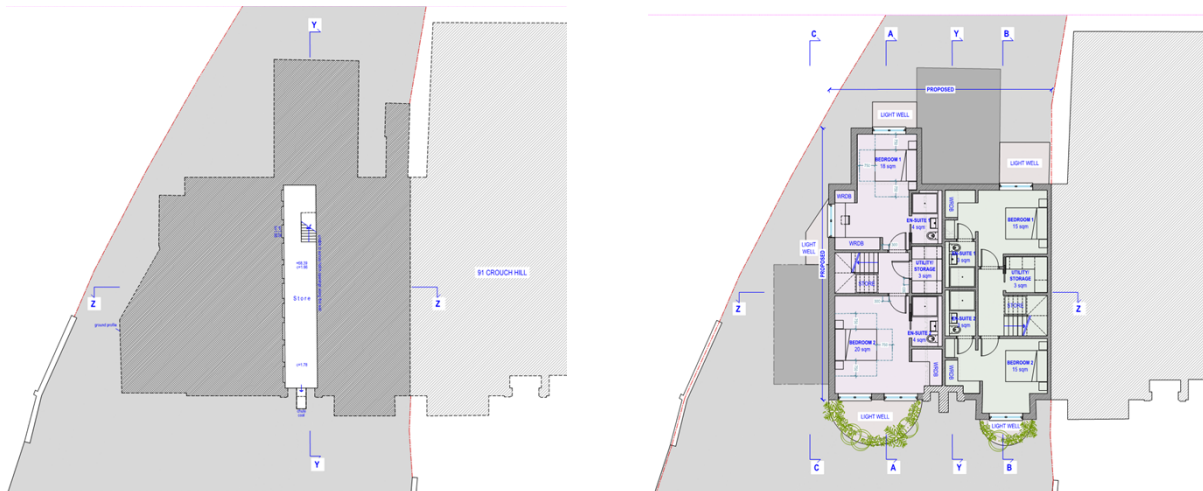
Existing Front Elevation



Proposed Front Elevation

Lightwells

- 10.16 The UDG explains that lightwells can be unsympathetic to the original frontage if they involve the loss of a verdant front garden. The proposed scale of the 2 no. lightwells means that the majority of the front garden would still be retained. Front light wells are not characteristic of the original dwellings in this area; however, in the context of the scale and features of the host dwelling and the houses in the terrace, it is considered that the excavation would have a very limited visual effect on the host dwelling or the wider terrace when seen from the public realm. The basement itself would not be visible from the public realm and is considered to have a neutral impact on the appearance of the streetscene (please also see Basement Development below).



Existing Basement

Proposed Basement

Metal Railings

- 10.17 The Design and Conservation Officer also stated that ideally the applicant should remove the metal railings and replace with concealed metal grilles. The proposed railings are considered to be more appropriate than the glass balustrade proposed at the pre-application stage and would be more in keeping with the existing metal railings to the front of the building. In addition, the site is not in a conservation area and the railings would be located at an acceptable distance away from the street and would be largely screened behind the low brick wall

- 10.18 Taking the proposed alterations together, these are not considered to cause material harm to the appearance of the building or the terrace. The scale and form of the external alterations are considered to comply with policies 7.4, and 7.6 of the London Plan 2016, CS8 and CS 9 of the Core Strategy 2011, Policy DM2.1 (Design) of the Development Management Policies 2013 and the Urban Design Guide 2017.

UNIT MIX

- 10.19 The NPPF acknowledges the importance of high quality and inclusive design for all development, and requires boroughs to deliver a wide choice of quality homes. The London Plan (2016) recognises that design quality is a fundamental issue for all tenures and that the size of housing is a central issue affecting quality. London Plan (MALP) 2016 Policy 3.5 states that new dwellings should take account factors relating to the "home as a place of retreat," and that housing developments should be of the highest quality both internally and in relation to their context.

- 10.20 Core Strategy Policy CS12 (Meeting the Housing Challenge) encourages residential development in the borough, with a range of unit sizes and tenures. Part E requires a range of unit sizes within each housing proposal to meet the needs in the borough. Policy DM3.1 parts A. and B state that all sites should provide a good mix of housing sizes and the housing mix required on all residential developments will be based on Islington's Local Housing Needs Assessment, (or any updated assessment prepared by or on behalf of the council). The current Housing Needs Assessment seeks the housing size mix (by habitable rooms) that is indicated alongside the proposed mix table below (referenced as policy DM3.1 target).
- 10.21 The proposal would create 5no. self-contained residential dwellings including a 1 bedroom 2 persons unit, 2no. 2 bedroom 4 person units and 2no. 3 bedroom 6 person units. Policy DM3.1 requires all sites to provide a good mix of housing sizes with 10% 1-bed, 75% 2-bed and 15% 3-bed. It is considered that the mix of housing units is considered satisfactory, particularly creating larger family units in this northern part of the borough.

QUALITY OF RESIDENTIAL ACCOMMODATION

- 10.22 Paragraph 17 of the NPPF outlines a set of core land-use principles which should underpin decision making, including that planning should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings.
- 10.23 London Plan Policy 3.5 states that securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities, and that new dwellings should take account of factors relating to arrival at buildings, and the place of retreat offered by homes. Policies DM3.4 and 3.5 require new developments to provide good quality accommodation both internally and externally, which should accord with the principles of good design and provide dual aspect accommodation unless exceptional circumstances are demonstrated.
- 10.24 The relevant standards for internal layouts and room sizes are provided by, The London Plan (2016) MALP Policy 3.5 and Table 3.3, the London Plan SPG: Housing (2016) and The Department for Communities and Local Government's Nationally Described Space Standard (March 2015).
- 10.25 Policy DM3.4 requires new units to have adequate sizes and layouts, good ceiling heights, sufficient storage space, and functional, useable space.

Internal floor area

10.26 The proposed units are required to meet or exceed the minimum space standards set out in Table 3.3 of the London Plan and the minimum space standard for storage set out in Table 3.2 of the Development Management Policies.

Unit No	Dwelling Permutation	Minimum Size (sqm)	Actual Size (sqm)	Minimum Storage (sqm)	Actual Storage (sqm)
1	3 bedroom / 6 person /	102	117	3.5	4.8
2	3 bedroom / 6 person	102	104	3.5	4.3
3	2 bedroom / 4 person	70	71	2.5	2.5
4	1 bedroom / 2 person	50	51	1.5	1.5
5	2 bedroom / 4 person	70	72	2.5	2.5

10.27 It is noted that all units exceed the minimum space standards. At the pre-application stage concerns were raised regarding limited storage space in all resulting residential units. The storage space in all units has been increased to meet the minimum storage space standards set out in Table 3.2 of policy DM3.4.

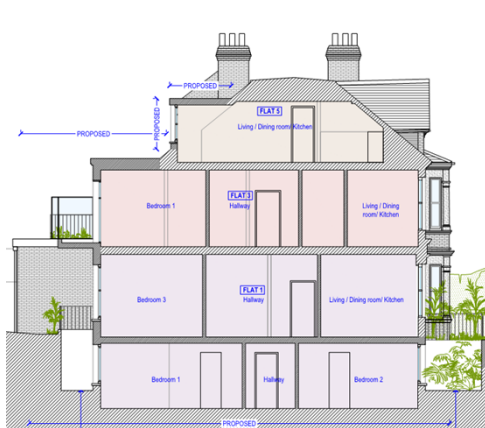
Floor to ceiling heights

10.28 As the proposal is for the conversion of an existing building and does not involve a new build development, there is no requirement for internal building heights. The London Plan requires a minimum floor to ceiling height of 2.5 metres for all new habitable rooms. The plans show with the exception of the second floor level, all floors would exceed the minimum 2.5 metre floor to ceiling height requirement. The second floor level has an internal height of 2.4 metres, whilst marginally lower than the London Plan requirement, given that the proposal is not for a new build development, it is considered acceptable in planning terms.

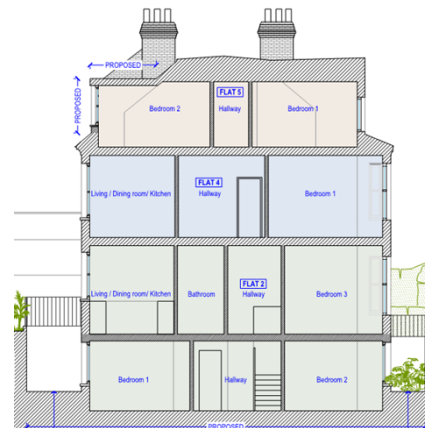
Aspect/Daylight and Sunlight

10.29 Policy DM3.4 requires new residential units to provide dual aspect accommodation, unless exceptional circumstances can be demonstrated. The policy also requires direct sunlight to enter the main habitable rooms for a reasonable period of the day and living, kitchen and dining spaces to receive direct sunlight. It is noted that all units would be dual aspect and provide acceptable levels of daylight/sunlight for future occupiers.

10.30 All units would be dual aspect and all main habitable rooms would have access to natural light and ventilation. At the pre-application stage concerns were raised regarding the poor outlook to habitable rooms whose main outlook would be onto the basement lightwell and may not receive enough light. A Daylight and Sunlight report was submitted with the current application. This includes an Internal Daylight Assessment to basement rooms and demonstrates that habitable rooms of the new units at basement level received good levels of daylight, in excess of the requirement of the BRE guidance and British Standards. Additional, two new sections A-A (1642-P04-02 Rev. P1) and B-B (1642-P04-03 Rev.P1) have been provided to demonstrate this (please see images below).



Proposed Section AA showing front and rear lightwells to Flat 1



Proposed Section B-B showing front and rear lightwells to Flat 2

Floor	Unit	Room	Recommended ADF	Actual ADF - %
Basement	1	Bedroom 1	1.00%	4.49%
Basement	1	Bedroom 2	1.00%	4.67%
Basement	2	Bedroom 1	1.00%	3.81%
Basement	2	Bedroom 2	1.00%	2.87%

Daylight level to the proposed unit's basement habitable spaces

Private Outdoor Space

- 10.31 Policy DM3.5 sets out the minimum requirements for private outdoor space with a minimum of 30 square metres for each ground level 3-bedroom dwelling. The upper floor flats would be required to provide 7 square metres for a 2 bedroom 4-person unit and 5 square metres for the 1-bedroom unit. The proposal would provide private gardens for the basement and ground floor duplexes, (family sized units), providing 59sqm of private garden space for Flat 1 and 121sqm of private garden space for Flat 2.
- 10.32 The proposed terraces for Flat 3 (2 bed) would be located to the side and rear of the building and would provide a total of 8sqm of private outdoor amenity space. It is proposed that Flat 4 would have a private terrace to the rear of the site Conditioned to be reduced from 10sqm to 5sqm. The proposed Flat 5 (2 bed) now has a private side terrace of 9sqm (minimum required 8sqm). It has been reduced by 3sqm from the scheme presented at the pre-application stage and set back from the front façade line as required. The private outdoor amenity space for all resulting residential units would exceed the minimum requirements stipulated within policy DM3.5 of the Development Management Policies.
- 10.33 Overall, it is considered that the proposed residential units would provide acceptable living conditions for future occupants in terms of the standard of accommodation and amenity space. The resulting residential units would accord with Policy 3.5 of the London Plan 2016, Policies CS8 and CS9 of the Islington Core Strategy 2011 and Policies DM2.1, DM3.4 and DM3.5 of the Islington Development Management.

ACCESSIBILITY

- 10.34 The National Standard for housing is broken down into 3 categories; Category 2 is similar but not the same as the Lifetime Homes standard and Category 3 is similar to the present wheelchair accessible housing standard. Planning must check compliance and condition the requirements. Building Control will only enforce the basic Category 1 standards.
- 10.35 The Inclusive Design Officer commented that all new residential units should meet the standards associated with Category 2 housing. The supporting document states that Flat 1 has been designed to be a disabled unit to satisfy the guidance contained within the Inclusive Design Guidance. The proposed unit also provides additional space required to facilitate permanent occupation by a wheelchair user, however access to the property is via the existing steps from the street level to the main front entrance door. The Inclusive Design Officer stated that an opportunity to provide step free access from the side to a rear entry point has been missed and this negates the effort that has clearly been made to deliver an otherwise adaptable property. The Inclusive Design Officer further stated that a careful rethink of the approach and entry arrangements could deliver at least two Category 2 homes. It is further stated that provision of a lift to the rear of the common stair would provide access to all units.
- 10.36 It was discussed at the pre-application stage that due to the existing topography of the existing street level (approximately 3 metres lower) in relation to the significant raised ground floor level of the building, that an external ramp approach was not possible because of the steepness of the ramp incline and the restrictive existing depth of the front garden access up to the main entrance door. The applicant also reviewed the possibility of providing access to the property via the adjacent private access road and has contacted the owners to assess the opportunity and feasibility of this being carried

out. However, the owners of the adjacent private road did not permit at any time the use of their private road for access of the application site. The provision for an external chair lift fitted along the existing handrail up to the main entrance door, was considered not to be fully practical.

- 10.37 It is acknowledged that if ground floor units could be delivered as step free then the development will have made a reasonable contribution to the stock of flexible homes in the borough. However, it is accepted that the proposal to convert and extend an existing building, given the site constraints, it is not realistic to expect compliance with Category 2 and therefore Category 1 is considered to be appropriate.

NEIGHBOURING AMENITY

- 10.38 Policy 7.6 (Part B) of the London Plan states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 10.39 Policy DM2.1 (Part A (x)) of the Islington Development Management Policies confirms that, for a development proposal to be acceptable, it is required to provide a good level of amenity including consideration of overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook.
- 10.40 At the pre-application stage it was noted that the adjoining property at no.91 has habitable room windows at ground floor level and there were concerns that a three-storey extension could impact on the amenity of the residential occupiers. Objections have also been raised regarding loss of privacy, overlooking and loss of light to neighbouring properties. As noted above under the current application is proposed to erect two storey side and rear extensions both located away from the windows to neighbouring properties.
- 10.41 At the pre-application stage concerns were also raised regarding the terrace proposed at rear second floor level resulting in loss of privacy to the adjoining property 91. Under the current submission the proposed private rear terrace and extended roof gable end at second floor level was omitted from the proposal and the rear elevation was redesigned. This is considered to address the concerns raised regarding loss of privacy to the adjoining property including no. 91. A condition is recommended to reduce the (rear) terrace serving Flat 4 to 5sqm in size. The proposal is overall not considered to result in harmful overlooking to neighbouring properties. The gardens to neighbouring properties are already overlooked by the windows to the rear elevation at the application site and neighbouring properties. The proposals are not considered to exacerbate the degree of overlooking to the neighbouring gardens.



Image showing rear windows to adjoining property at no. 91 Crouch Hill

- 10.42 The BRE guidance for daylight includes the use of the 45 degree ‘rule of thumb’ approach. It advises that a significant amount of light to a neighbouring window opening is likely to be blocked if the centre of the window or in the case of a floor to ceiling height such as a patio door, a point 1.6m above ground lies within the 45-degree angle of the new extension on both plan and elevation. In short, a 45-degree angle line is drawn out from the centre point of the window on the elevation and also on the floorplan. The BRE Guidelines state that if a proposed neighbouring extension obstructs both of these 45 degree lines (i.e. in height and depth) then the extension may cause noticeable loss of light and a more detailed BRE compliant daylight/sunlight assessment should be carried out. If it obstructs one of these lines but not both then sufficient light should be maintained.
- 10.43 The 45-degree test has been carried out to all the rear elevation windows and doors at the adjoining property at no. 91. The proposed side and rear extension and associated new terraces would pass the 45-degree test in both plan form and elevation. It is therefore considered that the proposal would not have an impact on the light levels to the neighbouring property at no. 91.
- 10.44 In light of the above, it is considered that the proposed development would not harm the living conditions of the occupiers of the adjoining occupiers, including no. 91 Crouch Hill. Accordingly, the proposal does not conflict with Policies CS8 and CS9 of Islington’s Core Strategy nor Policy DM2.1 of Islington’s Local Plan: Development Management Policies insofar as they aim to safeguard residential amenity. The scheme would also adhere to a core principle of the National Planning Policy Framework, which is to always ensure a good standard of amenity for all occupants of land and buildings.

BASEMENT DEVELOPMENT

10.45 The relevant policy DM6.3 is concerned with site context and proportion of the site already developed, proximity to listed buildings, hydrology of a site, topography, green infrastructure, biodiversity, location of trees and shrubs.

10.46 All new basement developments are required to comply with the Adopted Basement SPD. Paragraph 7.1.12 of the SPD states that:

'For infill residential development, the scale and extent of basement within a site should respond to the site context and the prevailing scale of development in the area. Basements should be proportionate, subordinate to the above ground building element, and reflect the character of its surrounds. The proportion of the site that is built upon/under to the proportion unbuilt upon when compared with surrounding buildings is of particular importance to achieving a compatible scale of development on infill sites.'

10.47 In line with the advice within the Basement SPD, for all basement development a Structural Method Statement (SMS) must be submitted (in accordance with the SMS requirements in Appendix B) in support of any such application. A Structural Engineers Report has been submitted in conjunction with the application and this has been produced and endorsed by a Chartered Structural Engineer.

10.48 The application proposes a single storey basement extension with front and rear lightwells. The proposed basement would run under the footprint of the ground floor of the building with the exception of front and rear lightwells. The basement would have approximate 2.5m floor to ceiling heights and an overall approximate excavation depth of 2.8m. The proposed basement demonstrates an appropriate scale of development that would not project beyond the above ground footprint (with the exception of lightwells) and which reflects the site coverage of the surrounding development patterns. It is considered to retain adequate space for meaningful landscaping and natural drainage to be maintained. Based on the proposed depth and scale of the basement, it would comply with the Basement Development SPD.

10.49 Concern has been raised with regards to the structural stability of adjoining buildings. The NPPG advises that the effects of land instability may result in landslides, subsidence or ground heave. Failing to deal with this issue could cause harm to human health, local property and associated infrastructure, and the wider environment. The application is also assessed in accordance with the Basement SPD which aims to promote best practice in terms of basement development in the borough.

10.50 It is important to note when dealing with land that may be unstable, the planning system works alongside a number of other regulations outside the realms of planning legislation including Building Regulations, which seek to ensure that any development is structurally sound as well as the requirements under the Party Wall Act. Any development hereby approved would also be required to fully comply with these regulations.

10.51 The Structural Engineers Report provides a construction methodology to minimise the risk to adjoining occupiers. This confirms that underpinning of the existing foundations is proposed to be carried out. The potential impact to adjoining properties has been looked at and reported on within the SMS, which appears to have dealt with these buildings in line with the SPD requirements in the design and mitigation proposals (underpinning and monitoring). As such condition requiring the implementation of the permission in accordance with an approved method statement would be consistent with the Basement Development SPD.

- 10.52 A further condition also has been attached requiring that the certifying professional (or replacement with a suitably qualified person with relevant experience) endorsing the SMS is retained for the duration of construction.
- 10.53 The site is not located within a flood risk zone. In relation to groundwater, The Structural Engineering Report and the Structural Basement Impact Assessment Report comment that the underlying layer is London Clay and that ground water flows are considered likely to be minimal to negligible. As such there is considered to be no adverse risk to the application site or potential risk to those adjoining occupiers, subject to supervised expertise during construction.
- 10.54 It is expected that detailed Landscape Strategy be submitted with any application, detailing how the scheme is designed to provide sufficient landscaping and protect and enhance biodiversity value on site in accordance with policies DM6.3(E) and DM6.5.

TREES

- 10.55 In accordance with Development Management Policy DM6.5 (Landscaping, trees and biodiversity), all developments must protect, contribute to and enhance the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting connectivity between habitats. Developments are required to maximise the provision of soft landscaping, including trees, shrubs and other vegetation, and maximise biodiversity benefits.
- 10.56 It is noted that several trees protected by a Tree Preservation Order (TPO 28/1977) are located off the southern site boundary away from the application site. To facilitate the proposed development and increase garden space two low quality trees are proposed for removal. These trees are not protected by the above TPO. An existing rear addition has already been constructed within the RPA of (T1) Plane, it is suspected that the construction of this structure would have removed any roots from this tree previously within that area.
- 10.57 The proposed new extension occupies a similar footprint to the existing one, the only new incursion within the RPA of this tree would be for a new basement / light well area however according to the arboricultural report this will be insignificant and equal to approx. 2% of the total RPA.
- 10.58 The overall juxtaposition between the proposed extension and off-site trees will not be dissimilar to the current one, furthermore as the crown of (T1) has been historically pruned, the principle of future crown pruning would be acceptable.
- 10.59 In principle there are no significant objections to the proposals. The information received shows the impacts on off-site trees should be minimal. The Tree Officer does not object provided the recommendations contained within this report are adhered to by construction staff trees then retained trees will be adequately protected. A condition has been attached to the application requiring the arboricultural method statement report and the tree protection plans for demolition and construction submitted in support of the application to be fully adhered to.

SINC AND OPEN SPACE SAFEGUARDING

- 10.60 Part C of Policy DM6.2 of the Development Management Policies seeks to protect and maximise biodiversity benefits to Public Open Space and promotes planting of native and local provenance species within Site of Importance for Nature Conservation (SINC).
- 10.61 The Parkland Walk to the south of the application of the application site has is designated as a Metropolitan Open Land (MOL1), Open Space (OS125) and Site of Importance for Nature Conservation (44). The application site does not directly adjoin the Parkland Walk there is a 4m driveway separating the site and the Parkland Walk. The proposed development which would not encroach on the Parkland Walk is not considered to impact on the designated Metropolitan Open Land (MOL1), Open Space (OS125) and SINC area. The proposal would therefore not contravene with policy DM6.2 which seeks safeguard, public open space, biodiversity benefits and Sites of Importance for Nature Conservation.

HIGHWAYS AND TRANSPORTATION

Residential Parking

- 10.62 Concerns have been raised regarding parking resulting from additional cars in the area. Islington policy identifies that all new development shall be car free. Car free development means no parking provision will be allowed on site and occupiers will have no ability to obtain car parking permits, except for parking needed to meet the needs of disabled people. The applicant planning statement confirms the application scheme is to be car free. No car parking is to be provided and there is to be no ability to obtain car parking permits by future occupiers. Car free development is to be secured via condition and legal agreement.

Cycle Parking

- 10.63 The provision of secure, sheltered and appropriately located cycle parking facilities (residents) will be expected in accordance with Transport for London's guidance: 'Cycle Parking Standards – TfL Proposed Guidelines'. Policy DM8.4 of the Development Management Policies supports sustainable methods of transport and requires the provision of 1 cycle space per bedroom.
- 10.64 It is proposed to provide 11 cycle spaces within the existing front garage with direct access from Crouch Hill. It is also proposed to include 3 additional cycle parking spaces for visitors at the communal area to the front of the building. The proposed cycle spaces are secured by Condition 7.

SUSTAINABILITY

- 10.65 Policy DM7.1 seeks to ensure development proposals integrate best practice sustainable design standards (as set out in the Environmental Design SPD), during design, construction and operation of the development. Also that minor developments creating new residential units shall be accompanied by a Sustainable Design and Construction Statement (SDCS), including where relevant an Energy Statement. The SDCS shall clearly set out how the application complies with relevant sustainable design and construction policies and guidance.

- 10.66 A Sustainable Design and Construction Statement was submitted to support the application. This report outlines the proposed sustainability and energy strategy for the proposed Aber Hotel development. It is stated in the statement that each of the proposed initiatives has been assessed on the relative sustainability potential and suitability to the site.
- 10.67 The principle objectives are to reduce the site's contribution to the cause of climate change by minimising the emissions of CO₂, by reducing the site's needs for energy and by providing some of the requirement by renewable/ sustainable means. Issues such as water and waste, biodiversity were also addressed in the study.
- 10.68 The submitted report proposes
- to improve building fabric in accordance with Part L1B 2013 of the Building regulations
 - to reduce energy consumption and carbon dioxide emissions through passive and energy efficiency measures
 - investigate the possibility of connection into existing District Heating/ Cooling Networks
 - investigate the feasibility of providing Central CHP Plant to serve the base heating and water requirements for the development
 - to proposed to reduce energy consumption and carbon dioxide emissions further through the use of onsite renewable/LZC energy technologies
- 10.69 The Statement also highlights that the proposed development will meet the energy and carbon policy requirements of the Mayor and Council's policies by:
- Adopting the energy hierarchy when determining the energy strategy
 - Achieving more than a 10% reduction in regulated carbon emissions for the development compared to the baseline calculation (Part L1B 2013) by good fabric standard, energy efficiency systems and passive design features
 - Achieving more than a 7% reduction in carbon emissions (regulated) through the provision of on-site renewable energy generation.
- 10.70 Other features such as sustainable material selection, low water consumption and internal and external recycling provision will also contribute to enabling future occupants to live more sustainably. In the interest of securing sustainable development a condition has also been attached to the application requiring the dwellings to be constructed to achieve a 19% reduction in regulated CO₂ emissions and water efficiency target 110 l/p/d.

REFUSE AND RECYCLING

- 10.71 The Council's publication entitled 'Recycling and Refuse Storage Requirements' provides guidance on storage for mixed use schemes. The aforementioned guidance is just that and should not be regarded as a mandatory requirement. It does however provide clear guidance in terms of the waste and recycling capacity.
- 10.72 It is proposed that the refuse and recycling storage is located along with cycle storage within the existing garage to the front of the application site accessed directly from the pavement along Crouch Hill. From the floor it is shown that there is a 3300 litre capacity for residential refuse and recycling.

- 10.73 Overall, the proposal would make satisfactory provision for refuse and recycling storage. A condition is attached to ensure that refuse and recycling facilities are provided prior to the first occupation of the development. This would be in line with Policy CS 11 of the Core Strategy and the Islington Street Environment Services 'Recycling and Refuse Storage Requirements' which seek to encourage sustainable waste management.

SMALL SITES AFFORDABLE HOUSING CONTRIBUTIONS

- 10.74 The Council's Affordable Housing Small Sites Contributions Supplementary Planning Document (SPD) together with Core Strategy policy CS12 Part G states that development proposals below a threshold of 10 residential units (gross) will be required to provide a financial contribution towards affordable housing provision elsewhere in the borough.
- 10.75 Paragraph 3.0.5 of the SPD states 'in line with the evidence base, the council will expect developers to be able to pay a commuted sum of £50,000 per unit for sites delivering fewer than 10 residential units in the north and middle parts of the borough where this site is located.
- 10.76 A Viability Assessment has been provided to demonstrate that the proposal would not be viable if there is a financial contribution to towards affordable housing. Adams Integra stated that the approach they took in the financial viability appraisal study follows the well-recognised methodology of residual land valuation (RLV). Put simply the residual land value produced by a potential development is calculated by subtracting the costs of achieving that development from the revenue generated by the completed scheme.
- 10.77 Adams Integra asserted that this appraisal demonstrates that the scheme is able to support an affordable housing contribution of £83,411 and remain viable. Should the Council be minded to grant planning approval, the applicant should be required to provide a contribution of £83,411 towards affordable housing. This scheme has been looked at in terms of its particular financial characteristics and it represents no precedent for any sustainable approach on the Council's policy base. The Adams Integra's Report is attached at Appendix 3 of this report.
- 10.78 The internal Viability Officer commented that having reviewed the appraisal inputs adopted by Adams Integra, they agree that these are all reasonable assumptions. It was noted that the proposed development's viability is constrained by high build costs due to the extensive basement works and the high Benchmark Land Value of £1,800,000. Additionally, the achievable sales values are lower due to the subject site being in the north of the borough where sales values are typically lower. The lower sales values when combined with the high build costs and the site's high existing use value as a functioning hotel have led to a reduction in viability. This decline in viability has resulted in a reduced affordable housing contribution. In view of this, the internal Viability Team agrees with Adams Integra's conclusion that the application CANNOT viably provide the full required Small Sites affordable housing contribution of £250,000, but can provide a partial contribution of £83,411.
- 10.79 The applicant has stated their willingness to enter into a Unilateral Undertaking in respect of the above sums. At present this UU is not signed or completed. Any planning permission is therefore subject to the finalising of a UU.

COMMUNITY INFRASTRUCTURE LEVY

- 10.80 This will be calculated in accordance with the Mayor's adopted Community Infrastructure Levy Charging Schedule 2012 and the Islington adopted Community Infrastructure Levy Charging Schedule 2014. The payments would be chargeable on implementation of the private housing.

OTHER MATTERS

- 10.81 Concerns were raised regarding obstruction of views of the Parkland Walk. There are no policies protecting the private views. The application therefore could not be refused for this reason. The scale of the development is considered proportionate to the site and there is no material loss of outlook or enclosure to neighbours.
- 10.82 Concerns were raised regarding dust, noise, disruption and traffic during building works are also not material planning considerations. Should these concerns arise they would require to report directly to the Council's Public Protection Team. Attention is also brought to Condition 8 attached requiring the submission of a Construction Environmental Management Plan to mitigate impacts during building works.
- 10.83 Clarification was sought for various issues for related to building works. It is considered that the proposed drawings and supporting documents clearly show the proposals. With regards to the clarification sought during building works this will be detailed within the Construction Management Plan which would require to be submitted and approved in writing prior to works commencing on site.
- 10.84 Concerns have been raised in relation to the lack of nesting locations for swifts and bats. Whilst it is acknowledged that no nesting locations have been identified, this matter can be controlled by way of condition. As such a condition has been recommended for at least 3 nesting box locations to be provided.

11. SUMMARY AND CONCLUSION

Summary

- 11.1 A summary is provided at paragraph 4.1 and 4.5 of this report.

Conclusion

- 11.2 It is recommended that planning permission be granted subject to conditions and section 106 legal agreement head of terms as set out in Appendix 1.

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:

ALTERNATIVELY, should this application be refused (including refusals on the direction of The Secretary of State or The Mayor) 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.

The Heads of Terms are:

- A financial contribution of **£83,411** towards the provision of off-site affordable housing.
- Car Free – No parking permits are to be secured for the new residential units

All payments are due on commencement of development and are to be index-linked from the date of committee. Index linking is calculated in accordance with the Retail Price Index. Further obligations necessary to address other issues may arise following consultation processes undertaken by the allocated S106 Officer.

RECOMMENDATION B

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

List of Conditions:

1	Commencement
	CONDITION: The development hereby permitted shall be begun not later than the expiration of three years from the date of this permission. 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).
2	Approved plans list
	CONDITION: The development hereby approved shall be carried out in accordance with the following approved plans: 1642-E01-00 Rev P2, 1642-E01-01 Rev P2, 1642-E02-00 Rev P2, 1642-E02-01 Rev P2, 1642-E02-02 Rev P2, 1642-E02-03 Rev P2, 1642-E02-04 Rev P2, 1642-E03-00 Rev P2, 1642-E03-01 Rev P2, 1642-E03-02 Rev P2, 1642-E04-00 Rev P2, 1642-E04-01 Rev P2, 1642-P01-01 Rev P5, 1642-P02-00 Rev P2, 1642-P02-01 Rev P2, 1642-P02-02 Rev P4, 1642-P02-03 Rev P5, 1642-P02-04 Rev P4, 1642-P03-00 Rev P2, 1642-P03-01 Rev P3, 1642-P03-02 Rev P3, 1642-P04-00 Rev P3, 1642-P04-01 Rev P2, 1642-P04-02 Rev P2, 1642-P04-03 Rev P1, 1642-P04-04 Rev P2, Design and Access Statement, Daylight and Sunlight Assessment, Viability Analysis,

	<p>Ecological Report – Extended Phase 1 Habitat Assessment: Bat Survey Report, Arboricultural Report – Assessment of Trees in Relation to Development for Planning Purposes, Arboricultural Report – Method Statement for Planning, Structural Engineering Report – Structural Basement, Impact Assessment Report, Sustainable Design and Construction Statement, Soft Landscaping Plan/Strategy, Supporting Planning Statement by Apcar Smith Planning, Applicants Supporting letter dated 190207, Planning Application Cover Letter 181101.</p> <p>REASON: To comply with Section 70(1) (a) of the Town and Country Act 1990 as amended and the Reason for Grant and also for the avoidance of doubt and in the interest of proper planning.</p>
3	Materials
	<p>MATERIALS (COMPLIANCE): The development shall be constructed in accordance with the schedule of materials noted on the plans and within the Design and Access Statement. The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.</p> <p>REASON: In the interest of securing sustainable development and to ensure that the resulting appearance and construction of the development is of a high standard.</p>
4	Rooflights (Compliance)
	<p>CONDITION: The proposed rooflight shall be in metal painted black to sit flush with the roof and shall be maintained as such thereafter.</p> <p>REASON: In order to safeguard the special architectural of the building.</p>
5	Car free development restriction
	<p>Car-Free Development: All future occupiers of the 5 residential dwellings hereby approved shall not be eligible to obtain an on street residents parking permit except:</p> <ul style="list-style-type: none"> i) In the case of disabled persons; ii) In the case of units designated in this planning permission as non-car free; or iii) In the case of the resident who is an existing holder of a residents' parking permit issued by the London Borough of Islington and has held the permit for a period of at least one year. <p>Reason: To ensure that the development remains car free.</p>
6	Visual Screens (Compliance)
	<p>CONDITION: The visual screen(s) to roof terrace(s) shown on the drawings hereby approved shall be installed prior to the first occupation of the development and shall be maintained as such thereafter into perpetuity.</p> <p>REASON: To prevent undue overlooking (oblique, backwards or otherwise) of neighbouring habitable room windows.</p>
7	Refuse/Recycling Provided and Cycle Parking Provision (Compliance)
	<p>CONDITION: The dedicated refuse / recycling and the bicycle storage area(s) hereby approved as shown on drawing no. 1642-P02-03 Rev. P4 shall be provided prior to the first occupation of the development hereby approved and shall be maintained as such thereafter into perpetuity.</p>

	<p>REASON: To secure the necessary physical waste enclosures to support the development and to ensure that responsible waste management practices are adhered to; ensure adequate cycle parking is available and easily accessible on site and to promote sustainable modes of transport.</p>
<p>8</p>	<p>Construction and Environmental Management Plan (CEMP) Details.</p>
	<p>CONDITION: No Development works shall take place on site unless and until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered to throughout the construction period. The CEMP should include details on the access, parking and traffic management and delivery arrangement throughout the construction phase of the development.</p> <p>The CEMP shall include details and arrangements regarding:</p> <ul style="list-style-type: none"> a) The notification of neighbours with regard to specific works; b) Advance notification of any access way, pavement, or road closures; c) Details regarding parking, deliveries and storage including details of the routing, loading, off-loading, parking and turning of delivery and construction vehicles and the accommodation of all site operatives', visitors' and construction vehicles during the construction period; d) Details regarding the planned construction vehicle routes and access to the site; e) Details regarding dust mitigation and measures to prevent the deposit of mud and debris on the public highway. No vehicles shall leave the site until their wheels, chassis and external bodywork have been effectively cleaned and washed free of earth, mud, clay, gravel, stones or any other similar substance; f) Details of waste storage within the site to prevent debris on the surrounding estate and the highway and a scheme for recycling/disposing of waste resulting from demolition and construction works; g) The proposed hours and days of work (with reference to the limitations of noisy work which shall not take place outside the hours of 08.00-18.00 Monday to Friday, 08.00-13.00 on Saturdays, and none on Sundays or Bank Holidays.) h) Details of any proposed external illumination and/or floodlighting during construction, including positions and hours of lighting; i) Details of measures taken to prevent noise disturbance to surrounding residents; j) Information on access and security measures proposed to prevent security breaches at the existing entrances to the site, to prevent danger or harm to the neighbouring residents, and to avoid harm to neighbour amenity caused by site workers at the entrances to the site; k) Details addressing environmental and amenity impacts (including (but not limited to) noise, air quality, smoke and odour, vibration and TV reception) l) Details as to how safe and convenient vehicle access will be maintained for all existing vehicle traffic using Hungerford Road at all times, including emergency service vehicles; m) Details of any construction compound including the siting of any temporary site office, toilets, skips or any other structure; and

	<p>n) Details of any further measures taken to limit and mitigate the impact of construction upon the operation of the highway and the amenity of the area.</p> <p>o) Details of measures taken to minimise the impacts of the construction process on air quality, including NRMM registration.</p> <p>The report shall assess the impacts during the construction phase of the development on the surrounding roads, together with means of mitigating any identified impacts. The report shall also identify other local developments and highways works, and demonstrate how vehicle movements would be planned to avoid clashes and/or highway obstruction on the surrounding roads.</p> <p>The demolition and development shall thereafter be carried out in accordance with the approved details and measures.</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 order to secure the safe and efficient operation of the highway network, local residential amenity and to mitigate the impacts of the development.</p>
9	Construction Monitoring
	<p>CONDITION: The Structural Engineers Report (Ref: AMA_REP_01 Rev. 01) dated June 2018 as set out will be overseen by the relevant and suitably qualified persons, particularly for key structural phases. A certified professional (or replaced with suitably qualified person with relevant experience) endorsing the Structural Engineers Report shall be retained for the duration of construction.</p> <p>REASON: To ensure no harm to neighbouring occupiers.</p>
10	Carbon and Water Efficiency
	<p>CONDITION: The dwellings hereby permitted shall be constructed to achieve a 19% reduction in regulated CO2 emissions, compared to compliance with the Building Regulations 2013, and a water efficiency target of 110 l/p/d. No occupation of the dwellings shall take place until details of how these measures have been achieved.</p> <p>REASON: In the interest of securing sustainable development.</p>
11	Trees Protection
	<p>CONDITION: The arboricultural method statement report from Tim Moya Associates (ref: TMA 170913-CD-21) and the tree protection plans for demolition and construction (TMA170913-C-22 + TMA170913-C-23) submitted in support of the application shall be adhered to in full.</p> <p>Particular attention, as stipulated within section 4 of the TMA arboricultural method statement (TMA 170913-CD-21), will need to be given for the requirement of arboricultural supervision at critical stages of the development.</p> <p>REASON: Required to safeguard and enhance the character and amenity of the site and locality and to avoid any irreversible damage to retained trees pursuant to section</p>

	197 of the Town and Country Planning Act 1990 in accordance with Policy DM 6.5, policies 7.19 and 7.21 of the London Plan.
12	Bird/Bat boxes (compliance)
	<p>CONDITION: A minimum of 3 no. nesting boxes / bricks shall be installed prior to the first occupation of the building and shall be retained into perpetuity.</p> <p>REASON: To ensure the development provides the maximum possible provision towards creation of habitats and bio diversity enhancements.</p>
	INFORMATIVES
1	CIL Informative: 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 Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). These charges will be calculated in accordance with the London Borough of Islington CIL Charging Schedule 2014 and the Mayor of London's 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 cil@islington.gov.uk . The Council will then issue a Liability Notice setting out the amount of CIL payable on commencement of the development.
2	S106 agreement
	SECTION 106 AGREEMENT: 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.
3	Surface Water Drainage
	It is the responsibility of a developer to make proper provision for drainage to ground, water course or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921.
4	Construction works
	Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Pollution Team, Islington Council, 222 Upper Street London N1 1XR (Tel. No. 020 7527 3258 or by email pollution@islington.gov.uk) or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.

5	Highways Requirements
	<p>Compliance with sections 168 to 175 and of the Highways Act, 1980, relating to “Precautions to be taken in doing certain works in or near streets or highways”. This relates, to scaffolding, hoarding and so on. All licenses can be acquired through streetworks@islington.gov.uk. All agreements relating to the above need to be in place prior to works commencing. Compliance with section 174 of the Highways Act, 1980 - “Precautions to be taken by persons executing works in streets.” Should a company/individual request to work on the public highway a Section 50 license is required. Can be gained through streetworks@islington.gov.uk. Section 50 license must be agreed prior to any works commencing. Compliance with section 140A of the Highways Act, 1980 – “Builders skips: charge for occupation of highway. Licenses can be gained through streetworks@islington.gov.uk. Compliance with sections 59 and 60 of the Highway Act, 1980 – “Recovery by highways authorities etc. of certain expenses incurred in maintaining highways”. Haulage route to be agreed with streetworks officer. Contact streetworks@islington.gov.uk. Joint condition survey required between Islington Council Highways and interested parties before commencement of building works to catalogue condition of streets and drainage gullies. Contact highways.maintenance@islington.gov.uk.</p>

APPENDIX 2: RELEVANT POLICIES

RELEVANT POLICIES

National Guidance

The National Planning Policy Framework 2019 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.

Development Plan

The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013.

A) The London Plan 2016

1 Context and strategy

Policy 1.1 Delivering the strategic vision and objectives for London

3 London's people

Policy 3.1 Ensuring equal life chances for all

Policy 3.3 Increasing housing supply

Policy 3.4 Optimising housing potential

Policy 3.5 Quality and design of housing developments

Policy 3.8 Housing choice

Policy 3.15 Coordination of housing development and investment

5 London's response to climate change

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.13 Sustainable drainage

6 London's transport

Policy 6.9 Cycling

Policy 6.13 Parking

7 London's living places and spaces

Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime

Policy 7.4 Local character

Policy 7.6 Architecture

7 Protecting London's open and natural environment

Policy 7.18 Protecting open space and addressing deficiency

Policy 7.19 Biodiversity and access to nature

Policy 7.21 Tree and woodlands

8 Implementation, monitoring and review

Policy 8.2 Planning obligations

Policy 8.3 Community infrastructure levy

B) Islington Core Strategy 2011

Spatial Strategy

Policy CS8 (Enhancing Islington's Character)

Infrastructure and Implementation

Policy CS18 (Delivery and Infrastructure)

Strategic Policies

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

Policy CS10 (Sustainable Design)

Policy CS12 (Meeting the Housing Challenge)

Policy CS13 (employment space)

C) Development Management Policies June 2013

Design and Heritage

DM2.1 Design

DM2.2 Inclusive Design

Housing

DM3.1 Mix of housing sizes

DM3.4 Housing standards

DM3.5 Private outdoor space

Health and open space

DM6.2 New and Improved public open spaces

DM6.3 Protecting open space

DM6.5 Landscaping, trees and biodiversity

Energy and Environmental Standards

DM7.1 Sustainable design and construction statements

DM7.2 Energy efficiency and carbon reduction in minor schemes

DM7.4 Sustainable design standards

Transport

DM8.4 Walking and cycling

DM8.5 Vehicle parking

Infrastructure

DM9.2 Planning obligations

Designations

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:

- Major Cycle Route
- Alexandra Palace viewing terrace to St Paul's Cathedral
- Article 4 Direction A1 – A2 (Rest of Borough)

The following designations relate to the Parkland Walk, immediately to the south of the site

- Metropolitan Open Land (MOL1)
- Open Space (OS125)
- Site of Importance for Nature Conservation (44).

Supplementary Planning Guidance (SPG) / Document (SPD)

The following SPGs and/or SPDs are relevant:

Islington Local Plan

- Environmental Design
- Affordable Housing Small Sites Contribution
- Accessible Housing in Islington
- Urban Design Guide
- Inclusive Design
- Basement Development

London Plan

- Accessible London: Achieving and Inclusive Environment
- Housing
- Sustainable Design & Construction



Viability Appraisal

89 Crouch Hill London N8 9EG

Background

Adams Integra have been instructed by the London Borough of Islington to comment on the viability of the proposed development at Land to the rear of 89 Crouch Hill, Islington.

The comments made by Adams Integra relate to the proposed development to apply for planning permission for the following (P2018/3775/FUL):

“Change of use of a hotel (C1 Use) with accommodation for 12 bedrooms into 5 self-contained residential units (C3 Use) comprising of 2no. three-bed, 2no. two-bed and 1no. one-bed with associated external works consisting of erection of replacement larger two-storey side extension and larger two storey rear extension; creation of a new window opening to existing front dormer; erection of new dormer and replacement dormer and insertion of 3 no. new rooflights to rear roof slope; creation of a refuse/cycle store in place of garage, creation of terraces at ground, first and roof level with associated metal railings balustrades, landscaping works ; internal reconfiguration and basement excavations including creation of front and rear lightwells.”

Our comments relate purely to the viability of the scheme and do not cover any other planning matters.

We have been provided with a viability report carried out by Willis & Co dated October 2018.

The Willis & Co report concludes the following:

To be clear the fact that the enclosed viability assessment shows a profit of less than 20% re-iterates the fact that the Affordable Housing Small Sites Contributions cannot be expected to be paid in this instance. The applicant does not have the capital to pay it at this stage and it would make the development unviable. Although; when the AHSSC is removed a suitable profit can be expected; the main reason that the applicant wants to create the residential units is for a long-term viable gain. That is; the applicant will create much needed and desired dwellings and rent them out in the short term and that over this period of time it is envisaged that the house prices will rise (and rise faster than the value of the existing building). This means that the rental income will pay for the mortgage repayments with the profit becoming more apparent in the longer term.

Viability is considered to be a material consideration which Local Planning Authorities are obliged to take into account in considering planning requirements.

Adams Integra have a considerable track record of assessing viability of planning gain requirements both for Local Authorities and for developers. This expertise runs to several years work for 73 Local Authorities and for a range of national, regional and local developers.

The writer of this report, David Coate, has over 30 years' experience in the development industry working for Local Authorities and developers as well as RPs and consultancy. He is experienced in considering viability analysis.

Matters of Fact

The need to consider viability is a material consideration. The need for a negotiation between the LPA and an applicant in terms of the amount of planning gain and when it is delivered is an essential element of the determination of any planning application where planning gain is required. There is no debate about the reasonableness of the Council's requirements, the nub of the issue is the impact in this case of what is required and how that affects the profitability of the scheme.

To take a view on a viability assessment put to us, we first consider viability without any S106 contributions to test base assumptions; and then include contributions to review its impact.

We have carried out a viability appraisal based on industry standard assumptions. We have also considered the information provided by the applicant.

We have used the Homes and Communities Agency's Development Appraisal Tool (HCA DAT) which is a recognised method of assessing viability and has been used at many

inquiries where viability is an issue. The scheme has been appraised against benchmark land value for the site/building. In this case we have used HCA DAT to calculate the Residual Land Value and assess whether the scheme is viable by comparing that RLV with the benchmark land value.

The Planning Gain requirement

It is important to note that the applicability of the planning gain is not at issue in this report; it is its impact on the making of a reasonable profit level. The Policy of London Borough of Islington is that all minor residential developments resulting in the creation of one or more additional residential unit(s) are required to provide a commuted sum of £50,000 per unit, towards the costs of providing affordable housing units on other sites within the borough.

In this case the required affordable housing contribution is £250,000 as the net gain is five new residential units.

Appraisal summary

We have carried our own appraisal of the scheme based on standard generic values but with actual values or estimates where these are given by the applicant and we are in agreement.

We have carried out an appraisal which includes the required £250,000 affordable housing to determine whether the residual land value is in excess of the benchmark land value.

Assessment of figures

The appraisals presented with this report have been assessed by the writer with his considerable experience in this field.

Benchmark Land Value

The recently published Planning Policy Guidance (July 2018) says the following:

“How should land value be defined for the purpose of viability assessment?”

*To define land value for any viability assessment, a benchmark land value should be established on the basis of the **existing use value (EUV)** of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to comply with policy requirements. This approach is often called ‘existing use value plus’ (EUV+).*

In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.”

The viability report from Willis & Co says the following:

“The freehold price of the existing building is assessed at £2,500,000 (please see Appendix C).”

Appendix C contains three separate opinions of the current value of the property which they all state is £2,500,000.

There is no further evidence provided as to how this conclusion was reached.

The VOA Summary valuation for 89, Crouch Hill shows a rateable value of £28,750 (April 2017). Applying a yield of 5% would result in a land value of £575,000.

We have reviewed local hotel comparables and found two within the near vicinity of the subject site, 59 Anson Road and 1 Church Lane (See Appendix 3).

59 Anson road has 15 rooms and is being marketed for £2,000,000 which equates to £133,333 per room; whilst 1 Church lane has 16 rooms and is being marketed at £1,950,000, which equates to £121,875 per room.

Using these comparables the average per room rate is £127,604 and applying this to the subject property’s 12 rooms results in an EUV of circa £1,531,250.

59 Anson Road and 1 Church Lane’s values are asking prices, we therefore rounded down to arrive at an Existing Use Value of £1,500,000.

As per the NPPF methodology of using EUV + an uplift to arrive at a Benchmark land Value and applying an uplift of 20% to the value of £1,500,000 would result in a benchmark land value of £1,800,000.

It is our opinion that this is a fair and reasonable assumption of the benchmark land value.

We have carried out a residual land valuation of the proposed scheme which we then compare to the benchmark land value for the hotel.

Build Costs

The Willis & Co report shows two build costs of £1,185,811 and £987,000 which equate to a rate of £2,647 per m² (including externals) and £2,203 per m² (including externals).

BCIS rates for refurbishment show a range from a median rate of £1,544 per m² to an upper quartile rate of £2,009 per m². For the new build element these range from a median rate of £1,784 per m² to an upper quartile rate of £2,105 per m². These rates do not include for external works. (see Appendix 4).



It is our opinion that different elements of the build will require different build costs per square metre in comparison with others. We have assumed a build cost figure of £3,000 per m² for the basement works and applied this to the basement area GIA of 106 m² providing a figure of £318,000.

We have assumed the BCIS Upper Quartile Refurbishment/Conversion for a 3-5 storey structure of £1,772 per m² and applied this to the GIA of 315sqm resulting in a figure of £558,180.

For the extensions we have adopted the BCIS Median Quartile New Build for a 3-5 storey building of £1,784 per m² and applied this to the GIA of 27 m² resulting in a figure of £48,168.

This results in a total build cost figure of £924,348.

We have also adopted 5% for externals which results in a total build cost of £970,565 not including contingencies.

Sales Values

Regarding the sales prices of the proposed new flats the Willis & Co report says the following:

“Local estate agents have totalled the value of the proposed 5 residential units at £4,500,000 (enclosed in Appendix D).”

Should the property be converted into the following five units, we would expect the values to be as follows:

Unit 1 – 3 beds, 117 Sq.M.,	£1,100,000
Unit 2 – 3 beds, 107 Sq.M.,	£1,100,000
Unit 3 – 2 beds, 71 Sq.M.,	£750,000
Unit 4 – 1 beds, 51 Sq.M.,	£600,000
Unit 5 – Penthouse, 72 Sq.M.,	£950,000
TOTAL	£4,500,000

This equates to the following sales rates:

Unit 1	3 bed (basement and ground floor)	117 m ²	£1,100,000	£9,402 per m ²
Unit 2	3 bed (basement and ground floor)	107	£1,100,000	£10,280 per m ²

Unit 3	2 bed first floor	71	£750,000	£10,563 per m ²
Unit 4	1 bed first floor	51	£600,000	£11,765 per m ²
Unit 5	2 bed penthouse	72	£950,000	£13,194 per m ²

We have carried out web-based research using Zoopla and Rightmove and through talking to local estate agents and it is our opinion that the sales values are too high and too optimistic. (See Appendix 2).

We have adopted the following values which we believe are more realistic:

Unit 1	3 bed (basement and ground floor)	117 m ²	£1,050,000	£8,974 per m ²
Unit 2	3 bed (basement and ground floor)	107	£1,025,000	£9,579 per m ²
Unit 3	2 bed first floor	71	£735,000	£10,352 per m ²
Unit 4	1 bed first floor	51	£500,000	£9,804 per m ²
Unit 5	2 bed penthouse	72	£750,000	£10,416 per m ²

We have included ground rents at £300 per annum and a yield of 5%.

Reasonable Profit Level

Adams Integra has represented numerous clients in both Appeal and Local Planning Inquiry context. The RICS Guidance Note – Financial viability in planning (2012) states the following at Paragraph 3.3.2:

The developer's profit allowance should be at a level reflective of the market at the time of the assessment being undertaken. It will include the risks attached to the specific scheme. This will include both property-specific risk, i.e. the direct development risks within the scheme being considered, and also broader market risk issues, such as the strength of the economy and occupational demand, the level of rents and capital values, the level of interest rates and availability of finance. The level of profit required will vary from scheme to scheme, given different risk profiles as well as the stage in the economic cycle. For example, a small scheme constructed over a shorter timeframe may be considered relatively less risky and therefore attract a lower profit margin, given the exit position is more certain,

than a large redevelopment spanning a number of years where the outturn is considerably more uncertain.

In this case a fair and reasonable approach, given the low level of risk, the strength of the economy and the relatively high capital values in Islington, would be to calculate the level of profit 15% of Gross Development Value.

Design fees

The Willis & Co appraisal includes £31,800 of planning fees and a further 15% of the build cost for professional fees (£177,872). It is our opinion that this is too high. We have adopted a rate of 10% of the build costs to reflect the total professional fees.

Contingencies

We have included contingencies at 5%.

Finance

We have used an interest rate of 6% which is a reasonable assumption.

Scheme Timings

We have assumed a 6-month lead in period to start on site and a 12-month build period. We have assumed the sales will commence upon completion of the project and we have allowed a 4 month sales period.

Sales and Marketing

We have assumed 2% for sales and marketing costs.

CIL

We have included CIL as follows:

Islington CIL: £39,251

Mayoral CIL: £9,440

Combined Total: £48,691

Conclusions

The approach taken in this study follows the well-recognised methodology of residual land valuation (RLV). Put simply the residual land value produced by a potential development is calculated by subtracting the costs of achieving that development from the revenue generated by the completed scheme.

The results of the RLV are then compared to the benchmark land value (BLV). If the RLV is more than the EUV then the scheme produces a surplus and is viable if not then there is a deficit and the scheme is not viable.



We have carried out an HCA DAT appraisal of the current scheme using the input values described including the required £250,000 affordable housing contribution.

The appraisal, which can be found at Appendix 1, produces a residual land value of £1,646,992.

When compared to the “benchmark value” of £1,800,000 this results in a **deficit** of £153,008 demonstrating that the scheme is not viable at a profit level of 15%.

We then reduced the affordable housing contribution until the residual land value reached the benchmark land value of £1,800,000.

This appraisal can be found at Appendix 1A and shows an affordable housing contribution of £83,411.

It is our opinion that this appraisal demonstrates that the scheme is able to support an affordable housing contribution of £83,411 and remain viable.

Should the Council be minded to grant planning approval it is our opinion the applicant should be required to provide a contribution of £83,411 towards affordable housing.

This scheme has been looked at in terms of its particular financial characteristics and it represents no precedent for any sustainable approach on the Council’s policy base.

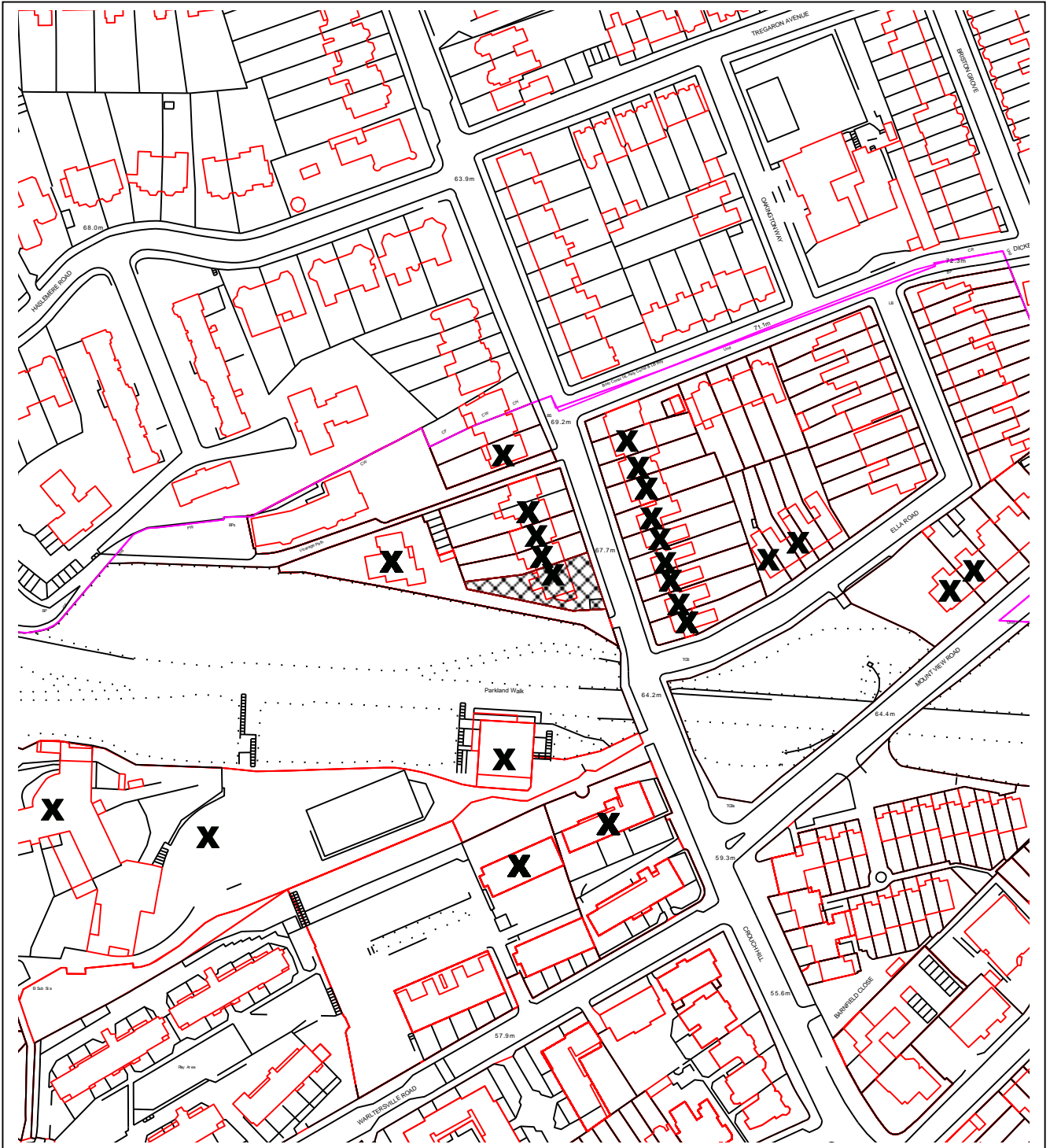
Author
David Coate,
May 2019

Appendices

1. HCA DAT appraisal – proposed scheme.
- 1A HCA DAT appraisal – proposed scheme with reduced affordable housing payment.
2. Sales research.
3. Benchmark Land Value research.
4. Build costs - BCIS

This page is intentionally left blank

ISLINGTON



This material has been reproduced from Ordnance Survey digital map data with the permission of the controller of Her Majesty's Stationery Office, © Crown Copyright.
P2018/3775/FUL

This page is intentionally left blank



PLANNING SUB-COMMITTEE A		AGENDA ITEM : B2
Date:	3 rd September 2019	NON-EXEMPT

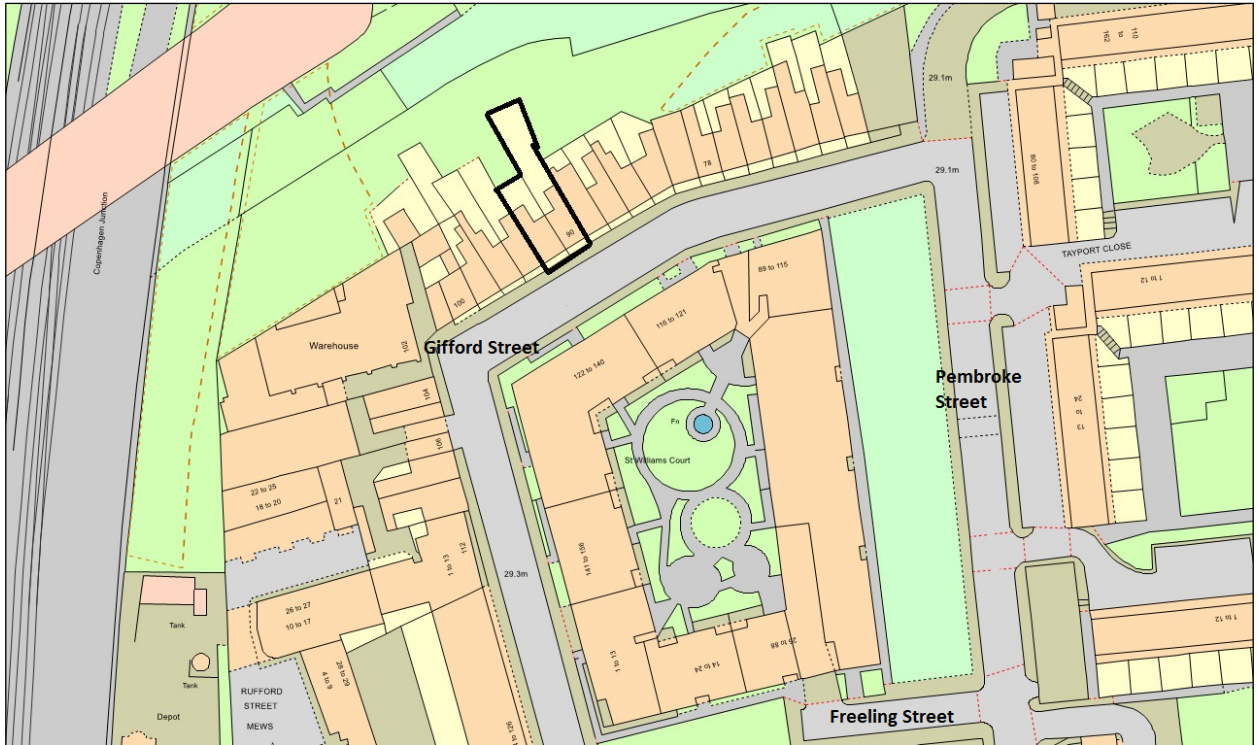
Application numbers	P2019/1996/FUL
Application types	Full Planning Application
Ward	Caledonian
Listed building	N/A
Conservation area	N/A
Development Plan Context	Core Strategy Key Area – Kings Cross & Pentonville Road Article 4 Direction (A1-A2)
Licensing Implications	None
Site Address	92 & 94 Gifford Street, Islington, N1 0DF
Proposal	Erection of mansard roof extensions with dormers above the existing butterfly roofs at nos. 92 and 94, and associated raising of party walls and chimney stacks. Reinstatement of timber sash window to rear second floor level elevation and rear ground floor fenestration changes at no. 94 and associated alterations.

Case Officer	Nathan Stringer
Applicant	Mr Paul Convery
Agent	JKA – Miss Heloise Desaissement

1. RECOMMENDATION

The Committee is asked to resolve to **GRANT** planning permission subject to the conditions set out in Appendix 1;

2. SITE PLAN (site outlined in black)



3. PHOTOS OF SITE/STREET



Figure 1: Aerial view of the site and surroundings



Figure 2: View of rear elevation



Figure 3: Gifford Street looking west (application site is on the right)

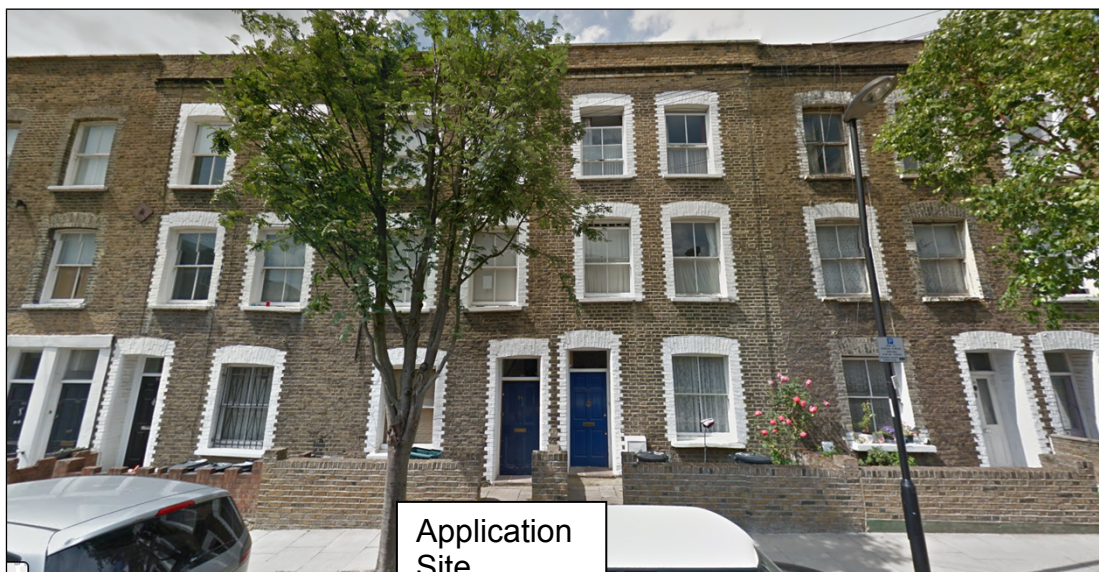


Figure 4: View of front elevation of nos. 92 (right) and 94 (left) Gifford Street



Figure 5: View of rear elevation of Nos. 92 (left) and 94 (right) Gifford Street

4. SUMMARY

- 4.1 The application site comprises of 2no. adjoining three-storey, mid terrace Victorian dwellings located on the northern side of Gifford Street. The properties each host a rear two storey outrigger, and their main roofslopes are formed by valley 'butterfly' roofs set behind parapets to the front. The buildings are not locally nor statutorily listed, and the site is not located within a conservation area.
- 4.2 Gifford Street is located to the south of the High Speed Railway tunnel portal and the North London Line of the London Overground; and to the east of the East Coast Mainline railway lines. The rear of the site backs onto open space which forms railway land. The vicinity of the site is primarily residential, characterised by largely uniform Victorian

terraced buildings on the northern side of Gifford Street (many of which contain original features including valley roofs set behind parapets), and modern flatted developments on the southern side of the street.

- 4.3 Under the terms of reference for the Council's constitution, the application is referred to committee as the applicant is an elected member of the council.
- 4.4 Overall, the proposal is considered to be of a high standard of design and would create contextual and policy compliant roof additions to the properties. The proposal would not cause any visual harm to the host properties, wider terrace setting and would not form dominant or disproportionate additions when seen from both the public and private realm.
- 4.5 The proposal is not considered to prejudice the residential amenity of neighbouring properties insofar of loss of light, overlooking, outlook or increased sense of enclosure and would not be contrary to policy DM2.1 of the Islington Development Management Policies June, 2013. The proposal is considered to be acceptable and in accordance with the Development Plan policies and planning permission is recommended for approval subject to conditions.

5. SITE AND SURROUNDINGS

- 5.1 The application site is comprised of 2no. adjoining three-storey, mid terrace Victorian dwellings located on the northern side of Gifford Street. The properties each host a rear two storey outrigger, and their main roof slopes are formed by valley 'butterfly' roofs set behind parapets to the front. The buildings are not locally nor statutorily listed, and the site is not located within a conservation area.
- 5.2 Gifford Street is located to the south of the High Speed Railway tunnel portal and the North London Line of the London Overground; and to the east of the East Coast Mainline railway lines. The rear of the site backs onto open space which forms railway land. The vicinity of the site is primarily residential, characterised by largely uniform Victorian terraced buildings on the northern side of Gifford Street (many of which contain original features including valley roofs set behind parapets), and modern flatted developments on the southern side of the street.

6. PROPOSAL (in Detail)

- 6.1 Planning permission is sought for the erection of mansard roof extensions above the existing valley roofs of the two adjoining properties. The mansards would be set behind the existing parapets to the front, and would retain the 'valley' roof parapet profile to the rear. The extensions would have a height of 2.8m, however from the front they would only project beyond the parapet by 1.4m. The mansards would also each include 2no. dormers to both the front and rear elevations – those to the front would have a width of 1.1m, and those to the rear a width of 1m. To accommodate the extensions, the chimney stacks and pots at the eastern and western boundaries with nos. 90 and 96 Gifford Street would be increased in height, as would the party wall between the two application properties. The extensions would be clad in slate, with leaded cheeked dormers and double-glazed timber sash windows. The extended party walls would be flashed over with lead.
- 6.2 The proposal also includes alterations to fenestration at the rear of no. 94, including the reinstatement of a previously blocked window opening at the second floor level (a timber sash window would be inserted into the opening), and the replacement of the existing ground floor window and door openings with a single timber sliding window/door opening.

7. RELEVANT PLANNING HISTORY:

No. 92 Gifford Street

7.1 None.

No. 94 Gifford Street

7.2 890982: Conversion to provide one 1-bedroom flat and one 2-bedroom maisonette. Approved with conditions 09/01/1990.

7.3 950155: Conversion to provide 2 x 1 bedroom flats on ground and first floors and one studio flat on second floor. Application refused 17/03/1995, subsequent appeal dismissed 18/02/1996.

REASON: The proposed conversion is contrary to the Council's adopted policy for residential conversion, requiring the provision of at least one 2-bedroom unit, capable of family occupation, which this scheme fails to provide.

Neighbouring Sites

7.4 862132 (No. 66 Gifford Street): Construction of a roof extension to add one habitable room and formation of a roof terrace. Approved with conditions 24/08/1987.

7.5 P001322 (No. 70 Gifford Street): Conversion to three flats with mansard roof and single storey rear extensions. Approved with no conditions 31/07/2000.

7.6 980147 (No. 72 Gifford Street): Construction of a mansard roof extension. Approved with conditions 20/04/1998.

7.7 882125 (No. 100D Gifford Street): Roof extension to existing two-storey dwelling house. Approved with conditions 13/09/1989.

8. CONSULTATION

Public Consultation

8.1 Letters were sent to occupants of 65 adjoining and nearby properties at Gifford Street and Rufford Street on 18 July 2019. Consultation expired on the 11 August 2019, however it is the Council's practice to continue to consider representations made up until the date of a decision.

8.2 At the time of writing this report **no** comments or objections have been received

Internal Consultees

8.3 None.

9. RELEVANT STATUTORY DUTIES & DEVELOPMENT PLAN CONSIDERATION & POLICIES

9.1 Islington Council (Planning Sub-Committee A), in determining the planning application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);

- To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004) (Note: that the relevant Development Plan is the London Plan and Islington's Local Plan, including adopted Supplementary Planning Guidance.)
- 9.2 The Planning Policy Framework (NPPF): Paragraph 10 states: "at the heart of the NPPF is a presumption in favour of sustainable development."
- 9.3 At paragraph 8 the NPPF states that the planning system has three overarching objectives in achieving sustainable development, being an economic objective, a social objective and an environmental objective.
- 9.4 The National Planning Policy Framework 2019 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.
- 9.5 Since March 2014 Planning Practice Guidance for England has been published online.
- 9.6 In considering the planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
- 9.7 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:
- Article 1 of the First Protocol: Protection of property. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.
 - Article 14: Prohibition of discrimination. The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.
- 9.8 Members of the Planning Sub-Committee must be aware of the rights contained in the Convention (particularly those set out above) when making any Planning decisions. However, most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted. Any interference with any of the rights contained in the Convention must be sanctioned by law and be aimed at pursuing a legitimate aim and must go no further than is necessary and be proportionate.
- 9.9 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. The Committee must be mindful of this duty inter alia when determining all planning applications. In particular, the Committee must pay due regard to the need to: (1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Development Plan

- 9.10 The Development Plan is comprised of the London Plan 2016, 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.
- 9.11 Some weight is attributable to the Draft London Plan 2019.
- 9.12 The site has the following designations under the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013 and the Finsbury Local Plan 2013:
- Kings Cross & Pentonville Road Core Strategy Key Area
 - Article 4 Direction (A1-A2)

Supplementary Planning Guidance (SPG) / Document (SPD)

- 9.4 The SPGs and/or SPDs which are considered relevant are listed in Appendix 2.

10. ASSESSMENT

- 10.1 The main issues arising from this proposal relate to:

- Design and Appearance
- Impact on the amenity of neighbouring residents.

Design and Appearance

- 10.6 The National Planning Policy Framework 2019 (NPPF) 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 and should contribute positively to making places better for people.
- 10.7 Policy CS9 of Islington's Core Strategy sets out the general principles to be followed by new development in the Borough. Policy CS9 and Policy DM2.1 of Islington's Development Management Policies 2013 accord with the National Planning Policy Framework (NPPF) in seeking to sustain and enhance Islington's built environment. Taken together, they seek to ensure that proposed development responds positively to existing buildings, the streetscape and the wider context, including local architecture and character, surrounding heritage assets, and locally distinctive patterns of development.
- 10.8 The application site comprises of two adjoining properties three-storey, mid terrace Victorian dwellings at nos. 92 and 94 Gifford Street, which are located on the northern side of the road. The properties each host a rear two storey outrigger, and their main roofslopes are formed by valley 'butterfly' roofs set behind parapets to the front. The buildings are not locally nor statutorily listed, and the site is not located within a conservation area.
- 10.9 The application proposes the erection of mansard roof extensions above the existing valley roofs of the two adjoining properties, and fenestration alterations at the rear of no. 94 including the reinstatement of a previously blocked window opening at second floor level and the replacement of the ground floor window and door openings with a single sliding window/door opening.

- 10.10 With regard to rooflines outside of conservation areas (such as the application site), paragraph 5.153 of the Islington Urban Design Guide 2017 states that there is more scope to introduce roof extensions where these are of a high quality design. Where a street frontage benefits from a consistent and unbroken roofline, alterations which would disrupt this consistent roofline and be visible from the public realm need to be designed in a style appropriate to the host building. Where the extension is not visible from the public realm, for example if it is generously setback from the front parapet, there may be more scope for flexibility in design.
- 10.11 The properties form part of a terrace group on the northern side of Gifford Street (nos. 66-100), most of which contain hidden valley roofs set behind front parapets. Whilst three of the properties host existing mansard roof extension – at nos. 66, 70 and 72, overall the roofline of the terrace group is considered to be largely unbroken. The construction of roof extensions which are not in keeping with the terrace can be damaging to its architectural unit, and have a deleterious effect upon the character and appearance of the area.
- 10.12 Whilst the existing roofline of the terrace group is largely unbroken, it is important to note the presence of the 3no. existing mansard roof extensions, which are considered to set a precedent for sensitively designed roof extensions on this side of Gifford Street. In this context, the existing extensions are considered to have a neutral impact on the character and appearance of the street-scene and wider area area. Therefore, in principle, two well-designed roof extensions at the application properties are considered to not detract from the street-scene along Gifford Street.
- 10.13 Paragraphs 5.154-5.158 of the Urban Design Guide 2017 discuss the most appropriate types of roof extensions for different types of roof forms, as well as the design principles that should be employed for each type. It is noted that mansard roof extensions are best suited for valley roofs on traditional properties. The guidance states that roof extensions to historic terraces should retain the historic parapet form and be set behind it. Particularly to Victorian/Edwardian terraces, the raising of the brickwork should be avoided, with clear distinction between the host building and the roof extension above being maintained. Valley ‘butterfly’ parapet profiles are a strong characteristic of rooflines in Islington and where these survive they should be retained. Party walls should follow the form of the roof and should not include a 90 degree up stand projecting beyond the form of the roof extension, and chimney stacks should be retained and only raised where they will not disrupt the rhythm of the terrace.
- 10.14 The proposed mansards would be set behind the existing parapets to the front, and would retain the ‘valley’ roof parapet profile to the rear. The extensions would each have a height of 2.8m, however from the front they would only project beyond the parapet by 1.4m. The mansards would also each include 2no. dormers to both the front and rear elevations – those to the front would have a width of 1.1m, and those to the rear a width of 1m. To accommodate the extensions, the chimney stacks and pots at the eastern and western boundaries with nos. 90 and 96 Gifford Street would be increased in height, as would the party wall between the two application properties. The extensions would be clad in slate, with leaded chequered dormers and double-glazed timber sash windows. The extended party walls would be flashed over with lead.

10.15 From street level on Gifford Street, the mansard roof extensions would not be significantly prominent given both the minimal height of the extensions above the parapet, and the setbacks proposed. Whilst the application properties are visible in views along Gifford Street, any views would be of the extensions' traditional mansard design and they would not appear prominent or overbearing within the immediate streetscene context given their overall acceptable height, scale and massing.



Figure 6: Proposed street views of the roof extensions at 92 & 94 Gifford Street

10.16 The proposal would result in the extensions being higher than the existing roofs and would require the chimneys at the boundaries with nos. 90 and 96 to be extended in height (as well as the building up of the party wall between the two properties). However, it is not considered that the chimney extensions would be unduly prominent in both public views from the street level as the parapet heights would be retained.

10.17 The design of the mansard extension would match the principles set out within the Urban Design Guide. It would retain and be set behind the parapet to the front of the dwelling, and would also retain the valley 'butterfly' profile to the rear elevation, which is considered to be a strong characteristic of the terrace group. Further, the raising of the party walls would match the profile/slopes of the mansard addition and would not include any 90-degree projecting upstands. Whilst the chimney stack at the party wall between the host property and no. 8 would be raised, as noted above it would not disrupt the rhythm of the terrace.

10.18 With regard to dormers, paragraph 5.161 of the Urban Design Guide states that the proportions of the dormer should relate to the windows of the original house. The solid surrounds (cheeks) of the dormer should be as slender as possible; simple lead cheeks with a double hung timber sash window is the best solution in this instance. Except for the window frame and cheeks, there should not be any solid face. The dormer should be positioned a clear distance below the ridge-line, significantly clear of the boundary parapets, and above the line of the eaves.

- 10.19 To proposed dormers would align with the windows of the original properties on the floors below. They would be slender, with simple lead cheeks and would not include significant expanses of solid face. They would be positioned a clear distance (approximately 0.5m) below the ridge of the mansard roof extensions, and set back the eaves where viewed from the rear. The dormers would be significantly clear of the boundary parapets, and would include double hung traditional timber sash windows.
- 10.20 The proposed reinstatement of a previously blocked window opening at the rear second floor level of no. 94 is welcomed, noting that the opening would match that of the original resulting in an enhancement in the character and appearance of the rear elevation of the dwelling. The proposed timber sash window to be inserted into the opening is also acceptable.
- 10.21 The proposed alterations to the rear ground floor fenestration at no. 94, including the replacement of the existing window and door openings with an enlarged single window/door opening to garden, is also considered to be acceptable and would not cause harm to the character or appearance of the host building. The use of timber materials for the sliding window/door is particularly welcomed.
- 10.22 Overall, the proposal mansard extensions and associated dormer windows at nos. 92 and 94, and alterations to the rear fenestration at no. 94, are considered to be acceptable and would cause no visual harm to the character or appearance of the host buildings, wider terrace setting, streetscene nor wider urban area. The proposal is therefore considered to accord with the NPPF 2019, policies 7.4 and 7.6 of the London Plan 2016, Draft London Plan Policies D1 & D2, policy CS9 of the Core Strategy 2011, policy DM2.1 of the Development Management Policies 2013 and Islington's Urban Design Guide 2017.



Figures 6 and 7: Existing and proposed front elevations (left and right, respectively).



Figures 8 and 9: Existing and proposed rear elevations (left and right, respectively).
Neighbouring Amenity

- 10.23 London Plan Policy 7.6 requires buildings and structures not to cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy and overshadowing, in particular. Policy DM2.1 of the Development Management Policies 2013 requires development to provide a good level of amenity including consideration of overshadowing, overlooking, privacy, sunlight and daylight, over-dominance, sense of enclosure and outlook. One of the core principles is to always seek to secure a good standard of amenity for all existing and future occupants of land and buildings. In this instance, no neighbour concerns have been raised with regard to amenity impacts of the proposal.
- 10.24 The proposed mansard additions would be located at roof level, and would be set in from the front and rear of the properties. They would therefore not cause harm to neighbouring amenity with regard to overshadowing, access to daylight and sunlight, over-dominance, sense of enclosure or outlook. The windows to the front of the extensions would be set back from the properties opposite and across the highway by at least 16m and would therefore not have an undue overlooking impact on privacy. This is further reduced when taking into consideration the existing overlooking between the properties given the windows at lower floor levels. The rear of the site backs onto open space which forms part of the railway land, and therefore there would be no overlooking concerns at the rear from either the dormer windows, or the reinstated window opening at the second floor level and alterations to ground floor opening at no. 94.
- 10.25 For these reasons, it is considered that the proposed development would not unacceptably harm the living conditions of the occupants of the adjoining properties. Accordingly, the proposal does not conflict with policy DM2.1 of the Development Management Policies 2013 or policy 7.6 of the London Plan 2016 insofar as they aim to safeguard residential amenity.

11. SUMMARY AND CONCLUSION

- 11.1 The principle of the development is considered acceptable and would not cause any visual harm to the character or appearance of the host building, wider terrace setting, streetscene or wider urban context. The proposal is considered to be conducive to the surrounding and established residential character and use of the area.
- 11.2 The proposed works would not result in unacceptable harm to neighbouring amenity with regard to overshadowing, overlooking, privacy, sunlight and daylight, over-dominance, any undue or material increase in sense of enclosure or loss of outlook to the rear elevations of both adjoining properties.
- 11.3 In accordance with the above assessment, it is considered that the proposed development is consistent with the policies of the London Plan 2016, Draft London Plan Policies D1 & D2, the policy CS9 of the Islington Core Strategy 2011, the policy DM2.1 of the Islington Development Management Policies 2013 and associated Supplementary Planning Documents and should be approved accordingly with conditions.

Conclusion

- 11.4 It is recommended that planning permission be granted subject to conditions as set out in Appendix 1 – Recommendations.

APPENDIX 1 – RECOMMENDATION

RECOMMENDATION

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

List of Conditions:

1	Commencement
	<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>
2	Approved plans list
	<p>CONDITION: The development hereby approved shall be carried out in accordance with the following approved plans:</p> <p>Design & Access Statement Rev A dated 15/07/2019, and drawing numbers 100, 200 & 300.</p> <p>REASON: To comply with Section 70(1) (a) of the Town and Country Act 1990 as amended and the Reason for Grant and also for the avoidance of doubt and in the interest of proper planning.</p>
3	Materials
	<p>CONDITION: The development shall be constructed in accordance with the schedule of materials noted on the hereby approved plans and Design & Access Statement Rev A. The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter into perpetuity.</p> <p>REASON: In the interest of securing sustainable development and to ensure that the resulting appearance and construction of the development is of a high standard.</p>

List of Informatives:

1	Construction Works
	<p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Pollution Team, Islington Council, 222 Upper Street London N1 1XR (Tel. No. 020 7527 3258 or by email pollution@islington.gov.uk) or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.</p>

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 and Regional Guidance

The National Planning Policy Framework 2019 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.

- Planning Practice Guide (2014)

2. Development Plan

The Development Plan is comprised of the London Plan 2016, 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

Policy 7.4 – Local character

Policy 7.6 – Architecture

Draft London Plan Policies D1 & D2.

B) Islington Core Strategy 2011

Policy CS9 – Protecting and Enhancing Islington’s Built and Historic Environment

C) Development Management Policies June 2013

DM2.1 Design

3. Designations

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

Islington Local Plan

Core Strategy Key Area – Kings Cross & Pentonville Road

Article 4 Direction (A1-A2)

4. Supplementary Planning Guidance (SPG) / Document (SPD)

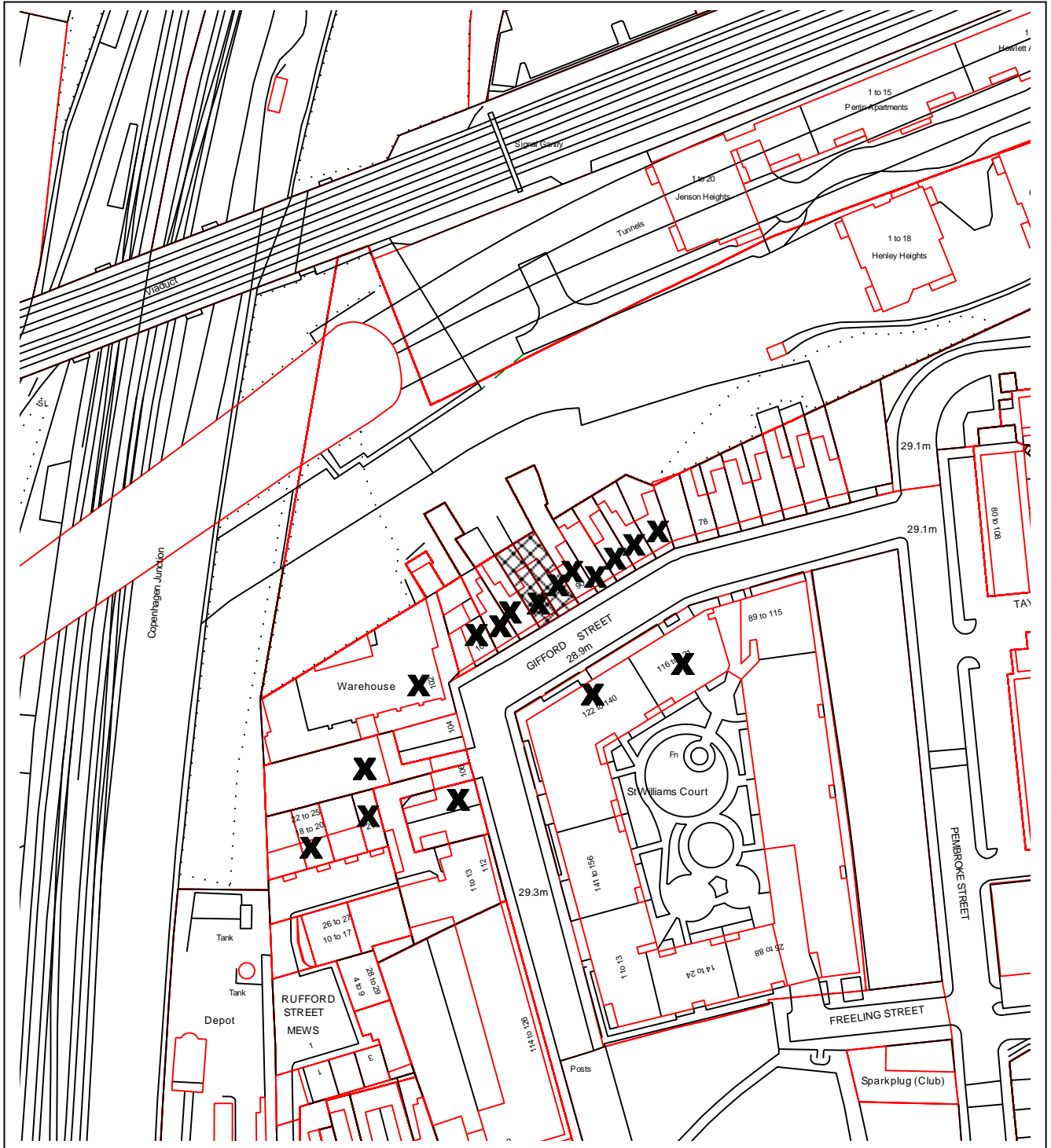
The following SPGs and/or SPDs are relevant:

Islington Local Plan

Urban Design Guide 2017.

This page is intentionally left blank

ISLINGTON



This material has been reproduced from Ordnance Survey digital map data with the permission of the controller of Her Majesty's Stationery Office, © Crown Copyright.
P2019/1996/FUL

This page is intentionally left blank

PLANNING COMMITTEE REPORT

Development Management Service
 Planning and Development Division
 Environment and Regeneration Department

PLANNING SUB COMMITTEE A		AGENDA ITEM: B3	
Date:	03 September 2019	NON-EXEMPT	

Application number	P2018/1453/FUL
Application type	Full Planning
Ward	Holloway
Listed building	Grade II Listed
Conservation area	St Mary Magdalene
Development Plan Context	Article 4 Direction A1 to A2
Licensing Implications	None
Site Address	Catholic Church of the Sacred Heart of Jesus, 64 Eden Grove, London, N7 8EN
Proposal	Construction of a tower over the existing listed church and associated alterations.

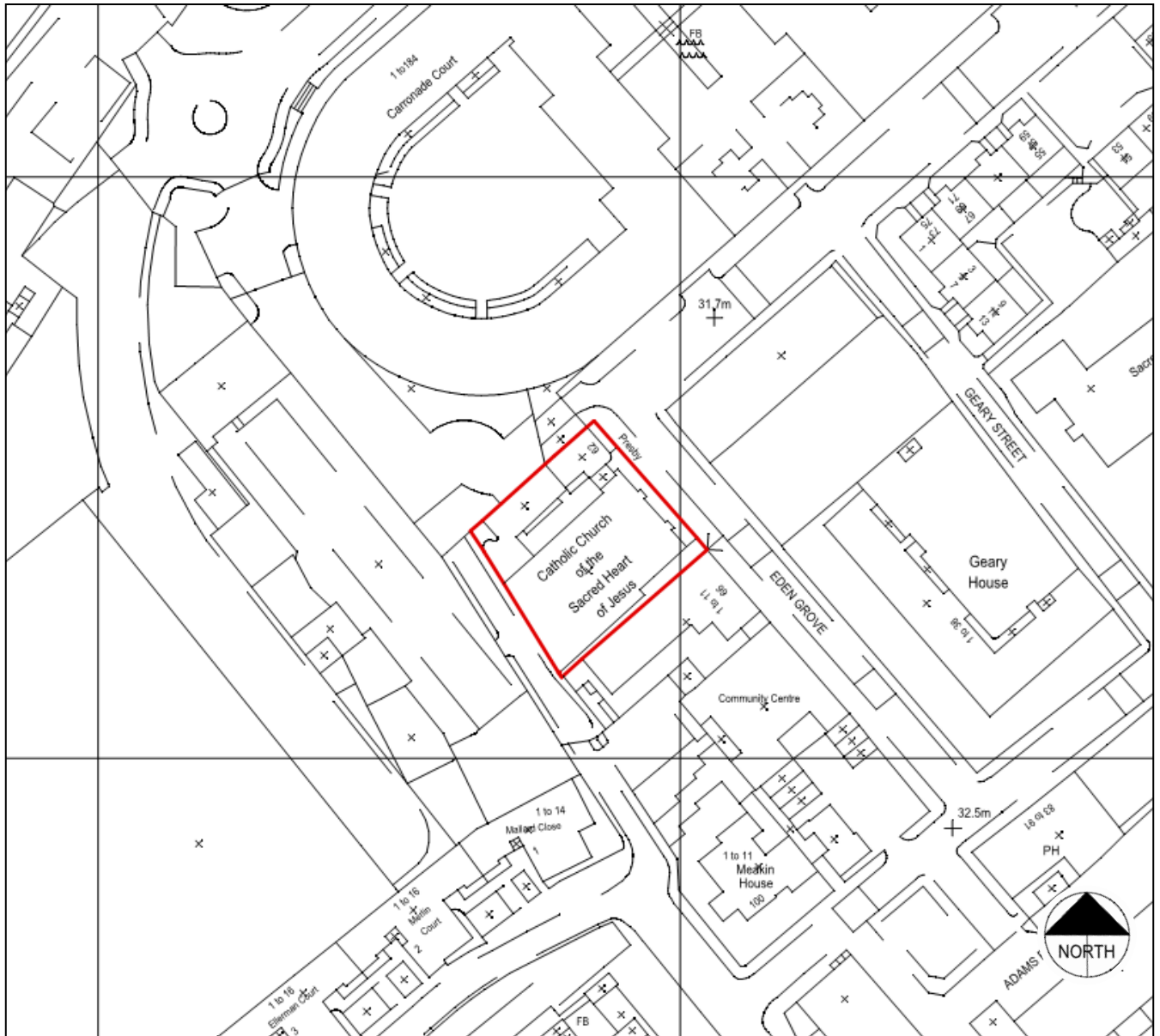
Case Officer	Rebecca Neil
Applicant	Westminster RC Diocese Trust
Agent	John Willcock Architects

1.0 RECOMMENDATION

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

- the conditions set out in Appendix 1; and
- no objection or direction being received from the Greater London Authority (GLA) raising new issues not considered in this report.

2. SITE PLAN (site outlined in black)



3. SITE PHOTOS



Image 2: Sacred Heart Church, looking west



Image 3: East elevation of the church, taken from Eden Grove (presbytery on right)

4.0 SUMMARY

- 4.1 The application site is a Grade II listed Roman Catholic church located on the south western side of Eden Grove, within the St Mary Magdalene Conservation Area. The building was designed by Frederick Hyde Pownall, a notable Victorian architect, and constructed circa 1870. The church was originally designed to have a tall, central tower, but the tower was never constructed because the Parish ran out of funds. This application seeks to complete the tower in line with the architect's original design.
- 4.2 The application is for planning permission only. Under the Ecclesiastical Exemption (Listed Buildings and Conservation Areas) (England) Order 2010, a listed Roman Catholic church is exempt from the control of a local planning authority in respect of listed building consent. The process is explained in further detail in para. 6.3, below.
- 4.3 The application is being brought to Committee because 21 objections have been received from 16 different local residents. The local planning authority has also received 2 letters of support.
- 4.4 The construction of the tower is considered to represent a considerable heritage benefit which enhances the significance of the Grade II listed building and the St Mary Magdalene Conservation Area. The tower would have no unacceptable impacts upon the amenity of surrounding residential properties in terms of loss of daylight, sunlight or privacy.
- 4.5 The proposal complies with the National Planning Policy Framework 2019, the London Plan 2016, the Islington Core Strategy 2011 and the Islington Development Management Policies 2013. It is therefore recommended that planning permission is granted subject to conditions outlined in Appendix 1 to this report.

5. SITE AND SURROUNDINGS

- 5.1 The application site is a Roman Catholic church located on the south western side of Eden Grove. The building was designed by Frederick Hyde Pownall, a notable Victorian architect, and constructed circa 1870. The church lies at the very edge of the St Mary Magdalene Conservation Area, which extends to the east and south of the site (see Image 4 below). However, the church's immediate setting is characterised by more modern development, most of which lies *outside* the Conservation Area. This includes the horseshoe-shaped blocks of flats at Carronade Court (to the north), the Sacred Heart Community Centre and Primary School (to the east) and the residential dwellings in Piper Close (to the South). To the west of the site are several contemporary industrial buildings, including the Islington Waste and Recycling Centre.

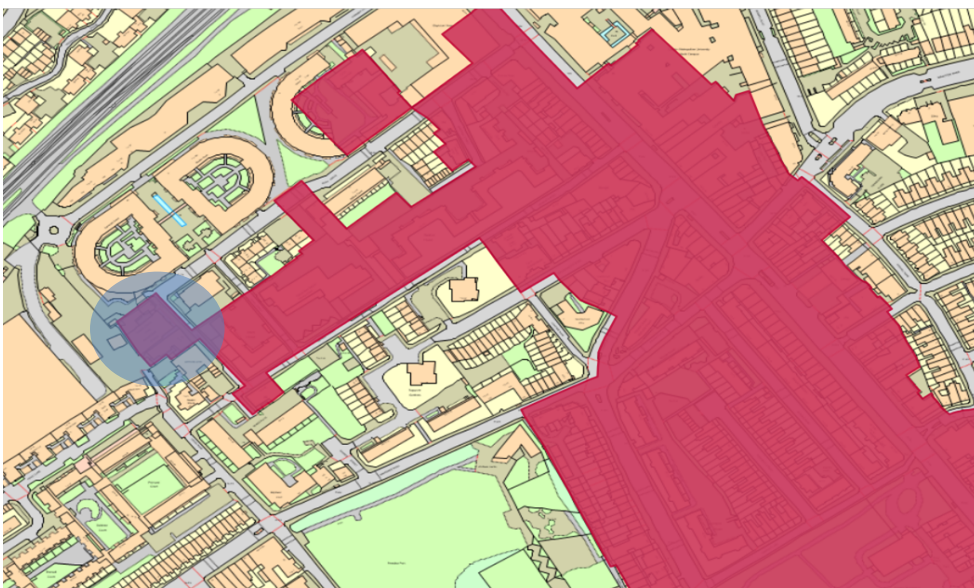


Image 5: Boundaries of the St Mary Magdalene Conservation Area

5.2 The church and adjoining presbytery (at No.62) are statutorily listed (Grade II). The listing reads as follows:

Church and presbytery. 1869-70. Founded by Canon Cornelius Keens, designed by F.H. Pownall. Yellow stock brick with white and black brick banding, some stone dressing. Slate roofs. Early English style. High gabled west front with low north aisle abuts large square tower. Linked to presbytery through archway with 4/4 sashes over. Stair turret with steep roof. Narrow gabled wing three storeys plus basement, two-window-range of 4/4 sashes. Church interior faced with red brick and black banding, stone dressings including carved stiff leaf capitals to nave arcades by Farmer and Brindley. Tall nave with clerestory and hammerbeam roof. Stations of the cross, painted carved oak in high relief by Anton Drape, 1909. Sanctuary with green and white marble altar, side altars and gallery remodelled 1960-1 by A.H. Archard. (RCHM: Islington Chapels: 1992-).

5.3 The church was originally designed to have a tall, central tower, as per Pownall's other ecclesiastical works (see historic perspective sketch in Image 6, below). However, due to funding limitations, the church was never completed as originally envisaged; instead, the lower section of the tower was 'capped off', resulting in a squat, truncated tower on the Eden Grove side of the church. The building has remained as such for nearly 150 years.

5.4 The public entrance to the church is on Eden Grove. Adjoining the presbytery is 60 Eden Grove, a former electricity generation station constructed circa 1896, and a locally listed building.

6.0 PROPOSAL (IN DETAIL)

6.1 Planning permission is sought for an upward extension of the tower with a saddleback roof. The rationale behind the application is to complete the architectural design of the church in line with the original intentions for the building, as illustrated in the architect's original perspective sketch (see Image 6, below). The tower is proposed to be constructed in yellow stock brick with black brick banding and dressings in Portland stone, and the roof will be covered in Welsh slates to match the existing building. The new tower contains two lancets (arched windows) on each of its four elevations.

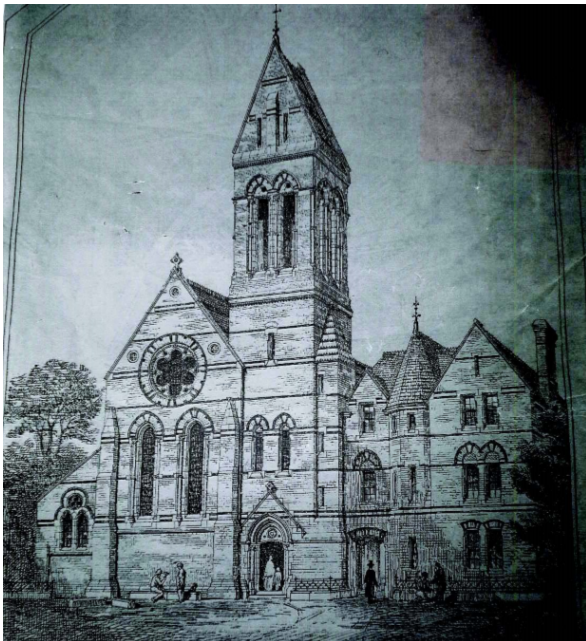


Image 6: Sketch by FH Pownall (circa 1869)



Image 7: Computer generated image of proposal (though note that lancets are now proposed to be left open, rather than glazed)

6.2 The extension is 14 metres in height from the top of the existing tower to the apex of the new saddleback roof and would be capped with an ornamental wrought iron cross of 1.5 metres in height, taking the total height to 15.5 metres. It should be noted that the tower is purely decorative and does not create any useable floor space. There is no public access to the tower; it will be accessed by church personnel only for the purposes of maintenance.

6.3 This application is for planning permission only. Under the Ecclesiastical Exemption (Listed Buildings and Conservation Areas) (England) Order 2010, a listed Roman Catholic church is exempt from the control of a local planning authority in respect of listed building consent. Alterations which would usually require such consent - if being carried out to a church - are dealt with by the church authorities under their Faculty system, which is broadly analogous to an application for listed building consent. However, any alterations which amount to development (and are not *permitted* development) still require planning permission, which is why this application still falls to be considered by the Council.

Drawing revisions

6.4 Three sets of revised drawings have been received since the application was first submitted in April 2018. The first revisions (Rev C, dated 02 July 2018) showed the removal of glazing from the lancet windows and amendments to the stonework. The second revisions (Rev D, dated 03 September 2018) showed the use of Portland stone, rather than Bath stone. The final and current revisions (Rev E, dated 6 November 2018) showed the removal of the ferramenta framework, originally intended to support the bird-proof mesh. All amendments were made as a result of ongoing dialogue with Islington's Design and Conservation team.

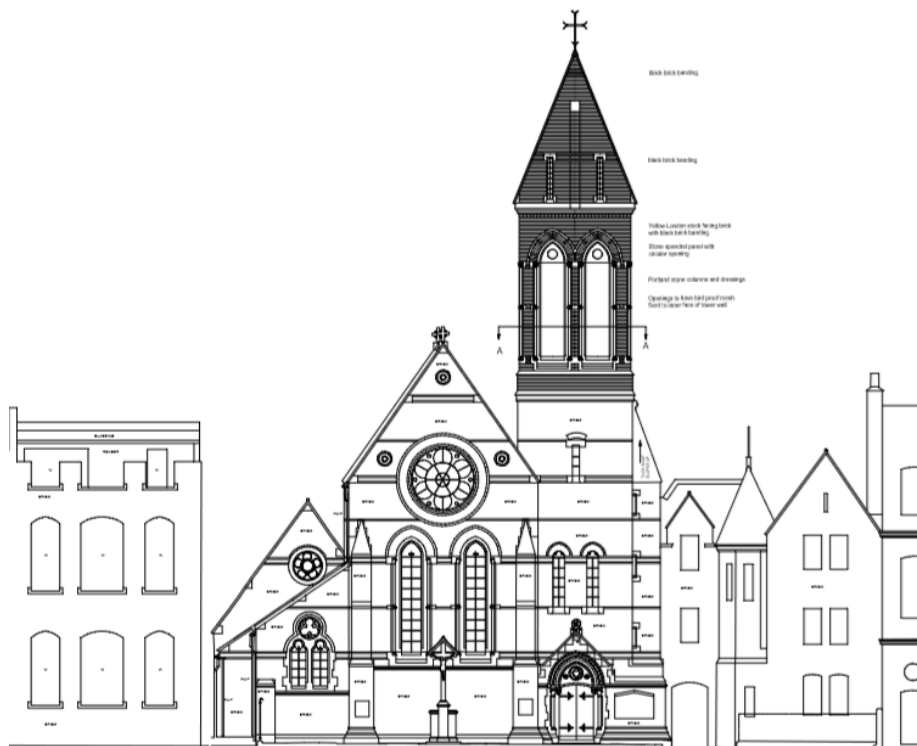


Image 7: Proposed elevation to Eden Grove

7. RELEVANT PLANNING HISTORY

7.1 There has been no relevant planning or enforcement history in relation to the site, and no pre-application advice has been sought.

8.0 CONSULTATION

Public consultation

8.1 Letters were sent to occupants of 269 adjoining and nearby properties in Eden Grove, Piper Close, Georges Road, Hornsey Street and Lough Road on 09 May 2018. A notice was displayed outside the site on the same date and a press notice published in the Islington Gazette. Re-consultation took place on the 11 April 2019 following the submission of revised plans. A notice was displayed outside the site and a press notice published in the Islington Gazette on 18 April 2019. The public consultation period expired on 09 May 2019, however it is the Council's practice to consider representations made up until the date of a decision.

8.2 At the time of writing of this report, 2 expressions of support and 21 objections have been received. Of those objections, 13 were to the original proposal in May 2018, and 8 to the re-consultation in April 2019 (of which 5 were from previous objectors). In addition, one comment has been received from a resident concerned about the impact of the construction work on their vulnerable parents who live nearby, and one comment has been received from the Islington Swift Group, requesting that swift bricks are installed in the new tower.

8.3 Objections from residents have raised the following issues:

- The tower is unsightly, too large and out of proportion with neighbouring buildings, and is therefore detrimental to the Conservation Area and Grade II listed building (objection addressed in paras. 10.2-10.9 below);
- The fact that the church was never completed is part of its story and that of the area; to complete it now would be detrimental to its character (objection addressed in para. 10.6 below);
- The character of the area has changed; it is inappropriate to construct, in 2019, a tower designed in 1870 (objection addressed in para. 10.5 below);
- The tower would overshadow several flats in Carronade Court and would reduce the amount of daylight and sunlight received by occupiers of surrounding properties (objection addressed in paras. 10.10-10.15 below);
- The tower would overlook surrounding properties and would detrimentally impact upon the privacy of surrounding residents (objection addressed in para. 10.16 below);
- If it is proposed to house bells in the church tower, this would result in noise nuisance for nearby residents (objection addressed in para. 10.17 & 10.18 below);
- The construction process will cause noise, disturbance and traffic problems (objection addressed in para. 10.18 below);
- The tower would block the view of the city, in particular St. Paul's Cathedral, from some flats in Carronade Court (objection addressed in para. 10.16 & 10.19 below)
- The tower serves no purpose and the money could be put to better use in the community (objection addressed in para. 10.20 below).

Internal consultees

8.4 **Design and Conservation Team** - initially raised concerns about the use of reconstituted stone, the proposal to glaze the window openings, and the use of ferramenta frames to support the bird-proof mesh. The applicant later submitted amended details showing the use of Portland stone and open lancets, and the Conservation team are now in support of the proposal, providing that the tower completion is historically accurate and 'scholarly'. The Conservation Officer has recommended a number of conditions which seek to achieve this aim.

External Consultees

8.5 **Greater London Authority** – were consulted on 11 July 2019 due to the fact that the height of the tower extension exceeds 15 metres. No response received to date.

9. RELEVANT STATUTORY DUTIES, DEVELOPMENT PLAN CONSIDERATIONS AND POLICIES

9.1 Islington Council (Planning Sub Committee A), in determining this planning application, has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004) (Note: the relevant Development Plan is the London Plan and Islington's Local Plan);
- To have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990) and;
- To pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area (s72(1)).

9.2 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:

- Article 1 of the First Protocol: Protection of property. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.
- Article 14: Prohibition of discrimination. The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

9.3 Members of the Planning Sub Committee A must be aware of the rights contained in the Convention (particularly those set out above) when making planning decisions. However, most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted. Any interference with any of the rights contained in the Convention must be sanctioned by law and be aimed at pursuing a legitimate aim and must go no further than is necessary and be proportionate.

9.4 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. The Committee must be mindful of this duty, *inter alia*, when determining all planning applications. In particular, the Committee must pay due regard to the need to: (1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9.5 In considering the planning application account must be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees. This report considers the proposal against the following documents:

National Policy

- 9.6 The National Planning Policy Framework 2019 (hereafter ‘the NPPF’) contains a presumption in favour of sustainable development. For decision-taking, this means approving development proposals that accord with the development plan without delay. The NPPF also contains guidance on determining planning applications for development affecting designated heritage assets. The NPPF is a material consideration in the determination of this application and has been taken into account during the assessment of these proposals.

Development Plan

- 9.7 The Development Plan is comprised of the London Plan 2016, the Islington Core Strategy 2011, the Islington Development Management Policies 2013, the Finsbury Local Plan 2013 and the Site Allocations 2013. The policies of the Development Plan that are considered relevant to this application are listed at Appendix 2 to this report.

Supplementary Planning Guidance (SPG) / Documents (SPDs)

- 9.8 The SPGs and/or SPDs which are considered relevant are listed in Appendix 2.

10. ASSESSMENT

- 10.1 The main issues arising from this proposal relate to:

- The design of the proposed development and its impact on the Grade II listed building and the St Mary Magdalene Conservation Area; and
- The impact of the proposal on the amenity of neighbours.

Design and impact on heritage assets

- 10.2 Under s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the local planning authority has a duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 72 (1) of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Authority to pay special attention to the desirability of preserving or enhancing the character and appearance of Conservation Areas.
- 10.3 Paragraph 200 of the NPPF provides that planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets which would enhance or better reveal their significance, and that proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. The NPPF also provides, in paragraphs 194-196, that any harm to, or loss of, the significance of a designated heritage asset requires clear and convincing justification.
- 10.4 London-wide planning policies relevant to design and conservation are set out in Chapter 7 of the London Plan. The Mayor of London’s Character and Context SPG is also relevant. At the local level, Policy CS9 of the Islington Core Strategy requires new buildings to be sympathetic in scale and appearance and complementary to local identity and provides that the historic significance of Islington’s unique heritage assets and historic environment will be conserved and enhanced. Policy DM2.1 of Islington’s Development Management Policies requires new development, *inter alia*, to respect and respond positively to existing buildings, the streetscape and wider context. Policy DM2.3 further provides that the borough’s heritage assets should be conserved and enhanced in a manner appropriate to their significance and also provides that ‘*proposals to repair, alter or extend a listed building must be justified and appropriate. Consequently, a high level of professional skill and craftsmanship will be required.*’

- 10.5 The significance of the Sacred Heart of Jesus Roman Catholic Church arises from the area's social and economic history and from the notoriety of the architect, in addition to the architectural details it possesses (particularly the interior, which are consistent with Pownall's other Roman Catholic churches). The area in which the church is located was, at the time it was originally constructed, one which suffered from extreme poverty. As a champion of the growing philanthropic movement to improve the physical environment of deprived urban areas, Pownall sought to bring architectural beauty to London's poorer neighbourhoods, and the Sacred Heart – and his other notable works, such as the Grade I listed St Peter's in Wapping – are important surviving examples of this endeavour. The tower was a crucial part of Pownall's original design; its omission constitutes a loss in both aesthetic and heritage terms. The reinstatement of the tower to the original specifications - however belated – provides an opportunity to enhance the significance of the listed building and restore integrity to the church. The proposal is considered to enhance and better reveal the significance of the listed building and, in accordance with para. 200 of the NPPF 2019, is supported.
- 10.6 Some objectors have expressed the view that it is inappropriate to complete the tower now - nearly 150 years after the foundation stone was laid - and the fact the tower is missing is part of the building's story. However, the reason the tower was never built was because the Parish ran out of money; the current form of the building is therefore not the result of a historically significant event. Whilst there is the potential for some loss of legibility of the evolution of the historic building, and therefore authenticity, the aesthetic value (in terms of the integrity of the original design) and symbolic value of the tower (in terms of wealth and piety) are highly important characteristics of the original design, and of Victorian ecclesiastical buildings in general. The construction of the tower would enable a better appreciation of the heritage asset as it was intended to be experienced. Relevant statutory bodies including Historic England, the Victorian Society and Ancient Monuments Society have all expressed support in principle (during the Faculty application process), lauding the tower as a 'brave and commendable' scheme which would enhance the significance of the listed building. A dedicatory plaque has been suggested to deal with the issue of authenticity, giving the date of the tower completion (see Condition 6).
- 10.7 The St Mary Magdalene Conservation Area as a whole, which extends west from the site, contains many historic (predominantly Victorian) buildings and although streets vary in their individual character, the quality of architecture and townscape throughout the area is high. However, it must be noted that the church itself is right at the very edge of the conservation area and its immediate context is characterised by much larger, contemporary buildings. Other than the church itself and the adjoining locally listed building at 6 Eden Grove, there is very little 'true' historic fabric left in the immediate vicinity, which likely explains why the conservation area boundary has been curtailed in the way it has. The church clearly makes a significant and positive contribution to the conservation area; more so than any other building in the vicinity. That being the case, any enhancement of the church also represents a significant enhancement to the conservation area and a reinforcement of its historic character.
- 10.8 The existing church is 15.5 metres in height and the extension to the tower measures another 15.5 metres, taking the total height of the building to 31 metres, which would be considered a 'tall building' within the definition in Islington's local plan. Policy CS9 (Part E) of the Core Strategy and Policy DM2.1 (Part C) of the Islington Development Management Policies set out very specific locations in the south of the Borough where tall buildings may be suitable; this site is not within those areas. However, the application is not for a 'typical' tall building of the kind which Policies CS9 and DM2.1 seek to resist, and should be assessed according to its individual circumstances. The tower would be visible from several locations within the conservation area and from elsewhere within Islington and, most notably, it would be highly prominent in long views looking south west along Eden Grove from Holloway Road. However, it does not lie within any strategic viewing corridors and, due to its shape, is considered to make a unique and positive contribution to the townscape. It is also noted that there are many taller buildings in the area, such as the 9-storey Carronade Court and the recently constructed buildings near Holloway Road station. Some objectors have suggested that a shorter, more proportionate tower may be more appropriate. However, the tower is only a heritage benefit to the extent that it is an accurate representation of Pownall's original design. A tower with more 'squat' proportions would not be an accurate depiction of the original Victorian design and would not be considered acceptable in heritage terms.

- 10.9 Given all of the above, it is considered that the proposal represents an enhancement to the significance of both the listed building and the conservation area and is supported. However, it is crucial - given the visibility of the tower and the purpose it seeks to achieve - to ensure that it is constructed in a scholarly fashion and to the highest quality. Three conditions are proposed to achieve this (it is also noted that the Faculty application will look carefully at such details). Condition 3 seeks to ensure that the works carried out to the building match the existing work in terms of material, colour, texture and profile; Condition 4 requires the submission and approval of a detailed design statement including drawings at a scale of 1:10 or 1:20 of all architectural details to the proposed tower, prior to development commencing; and Condition 5 requires the submission and approval of details and samples of all facing materials. Together, these conditions are designed to ensure high quality design and detailing and the safeguarding of the heritage asset in accordance with Policy DM2.3.

Impact on neighbouring amenity

- 10.10 Policy 7.6 of the London Plan provides that development should not cause unacceptable harm to the amenity of surrounding properties, particularly residential buildings. This is reflected at local level in Policy DM2.1 of the Islington Development Management Policies, which requires developments to provide a good level of amenity, including consideration of noise, disturbance, overshadowing, overlooking, privacy, direct daylight and sunlight, over-dominance, sense of enclosure and outlook.

Daylight and sunlight

- 10.11 The applicant has submitted a Daylight and Sunlight report prepared by Flow Analysis Limited to test the impacts of the proposed tower on a number of surrounding properties at Carronade Court, Geary House, the adjoining presbytery and the primary school. The applicant's chosen methodology follows guidance provided in the Building Research Establishment's 'Site Planning for Daylight and Sunlight' document, published in 2011. A total of 69 windows of surrounding properties have been identified as potentially affected by daylight and sunlight issues, and these windows have been tested using the Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH)/Winter Probable Sunlight Hours (WSPH) tests.
- 10.12 The BRE guidance advises that 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. In this instance, 68 of the 69 windows tested comfortably meets these values. Only a single window would retain less than 0.8 of its former value, which is a third floor window in the adjoining presbytery. However, even then, it retains 0.77 of its former values, a minimal reduction which would generally be considered acceptable in an urban environment such as this. Overall, it is considered that there would be limited and minimal adverse impact on daylight received by surrounding residential properties.
- 10.13 The applicant has identified 62 windows within 90° of due south and therefore potentially affected by the proposed development in terms of sunlight. The applicant has used the APSH test to ascertain whether the centre of adjacent windows (facing) would receive 25% of annual probable sunlight hours, including at least 5% of those hours in the winter months between 21st September and 21st March, as required by the BRE guidance. If the available sunlight hours are both less than these amounts and less than 0.8 times their former value, occupants would notice a loss of sunlight. Of the 62 windows tested, all windows either receive greater than 25% APSH and 5% WSPH or retain greater than 0.8 of their former values. Therefore, there will be no noticeable impact in terms of sunlight.
- 10.14 The applicant has not carried out any overshadowing assessment in relation to outdoor amenity spaces in the vicinity of the tower but, given the development's relatively narrow profile, it is considered that overshadowing to any nearby amenity spaces would be minimal. There is a playground associated with the Sacred Heart Primary School directly opposite the site, but this is unlikely to be affected to a significant degree due to its orientation and would only be affected later on in the day. There is a row of garden spaces at Geary House, but again these have a favourable orientation in relation to the tower, and are approximately 50 metres away from the proposed development. There is also what appears to be an amenity space on a flat roof to the rear of Carronade Court, but this is already overshadowed considerably by the building at No. 60 and it is considered that the proposed tower would be unlikely to increase overshadowing of this space to a significant degree.

Overlooking/loss of privacy, outlook and enclosure to adjoining properties

- 10.15 The tower is purely decorative and includes no useable floor space. It is also open to the elements. Access to the tower will be solely for church personnel, and only for the purposes of maintenance, and it is therefore considered likely that the tower will be 'occupied' on a very infrequent basis. In addition, all windows to surrounding residential properties in Carronade Court, Eden Grove and Piper Close are located further than 18 metres from the tower, meeting the general guideline set out in paragraph 2.14 of Islington's Development Management Policies; many of the windows are also at oblique angles so that opportunities for overlooking would be highly limited in any event.
- 10.16 It is noted that the new tower will develop and additional height to the church building where up until present no built form has existed. Therefore, it is inevitable that the development will be noticeable from the rear windows and balconies of adjoining properties and will change the outlook and overall views from these properties over what currently exists on site. However, planning does not protect rights to a view in planning terms but seeks to safeguard any material loss of outlook or increased enclosure from new developments. In this case the new spire would be noticeable from adjoining residential spaces and terraces but the overall separation distances between the site and adjoining properties, the oblique angles of view and the acceptable overall massing and scale of the tower and sloping and diminishing scale as it increases in height is considered to ensure that there would be no material loss of outlook or undue increase in enclosure levels to the habitable room windows and outside spaces of adjoining residential uses in this case such that a refusal of the application on this basis could be reasonably sustained.

Noise

- 10.17 A number of objectors have expressed concern that, should the tower be fitted with church bells, this would cause noise disturbance to surrounding residents. It is confirmed that there are no bells proposed for the tower. Therefore, there will be no noise disturbance caused by the completed development.

Other issues raised by residents and consultees

Noise, disturbance and traffic during construction

- 10.18 It is accepted that, due to the constrained nature of the site, narrow roadways and proximity to a primary school, the construction process is likely to result in some noise and disturbance to neighbouring properties. It is therefore considered appropriate to attach a condition requiring submission of a construction management plan (see Condition 7).

Loss of private views

- 10.19 It is well established that the loss of a view is not a material planning consideration and cannot be taken into account during determination of a planning application. Likewise, the fact that a premium was paid by occupiers of private property for such a view is also irrelevant to the determination of a planning application. The exception is where the view from a particular location is also a valued public asset, but this is not the case here (the site lies outside all strategic viewing corridors).

The money could be put to better use

- 10.20 The local planning authority can only assess the merits of any given proposal before it, having regard to the development plan and other material planning considerations. It is not entitled to question the manner in which the applicant wishes to spend its money.

Structural integrity

- 10.21 Though something which is usually considered when dealing with an application for listed building consent (and will be considered under the Faculty application), the structural impact of the new tower is not a material planning consideration. Notwithstanding this, members may wish to note that the applicants have provided a report from a structural engineer confirming that the structure of the existing church will be adequate to support the load of the completed tower. The report recommends that further investigations are carried out prior to the development commencing, and it is also noted that the development will be subject to approval under the Building Regulations.

11. SUMMARY AND CONCLUSION

Summary

- 11.1 Please see paragraphs 4. To 4.5 within this report.

Conclusion

- 11.2 It is recommended that planning permission be granted subject to conditions as set out in Appendix 1 - RECOMMENDATIONS.

APPENDIX 1 – RECOMMENDATIONS

RECOMMENDATION A

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

1	Commencement
	<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.</p>
2	Approved plans
	<p>CONDITION: The development hereby approved shall be carried out in accordance with the following approved plans and details:</p> <p style="padding-left: 40px;">Site location plan 01 3100 105 918110 Rev. E 01 3100 103 Rev. E 01 3100 104 Rev. E Design & Access Statement (version 3, 6 November 2018) Heritage Statement (12 November 2018) Historic perspective sketch by F.H. Pownall Email from John Willcock dated 30 August 2018 and attached photographs and architectural detail drawing Daylight and Sunlight Assessment (16 November 2018)</p> <p>REASON: To comply with Section 70(1) (a) of the Town and Country Act 1990 as amended and the Reason for Grant and also for the avoidance of doubt and in the interest of proper planning.</p>
3	Works and finishes to match (compliance)
	<p>CONDITION: All new external works, internal works, finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to material, colour, texture and profile. All such works and finishes shall be maintained as such thereafter.</p> <p>REASON: In order to safeguard the special architectural or historic interest of the heritage asset and ensure high quality design and detailing.</p>
4	Detailed design statement (details)
	<p>CONDITION: Notwithstanding the plans hereby approved, a detailed design statement including drawings at a scale of 1:10 or 1:20 (as appropriate) of all architectural details to the proposed tower, shall be submitted to, and approved in writing by, the Local Authority prior to the relevant works commencing.</p> <p>REASON: In order to safeguard the special architectural or historic interest of the heritage asset and ensure high quality design and detailing.</p>

5	Samples of facing materials (details)
	<p>CONDITION: Notwithstanding the plans hereby approved, details and samples of all facing materials, including a brick sample panel constructed in-situ, shall be submitted to, and approved in writing by, the Local Authority prior to the relevant works commencing.</p> <p>REASON: In order to safeguard the special architectural or historic interest of the heritage asset and ensure high quality design and detailing.</p>
6	Dedicatory plaque (details)
	<p>CONDITION: Notwithstanding the plans hereby approved, details of a dedicatory plaque relating to the completion of the tower, including its proposed location, shall be submitted to, and approved in writing by, the Local Authority prior to completion of the tower.</p> <p>REASON: In order to safeguard the special architectural or historic interest of the heritage asset and in particular its authenticity.</p>
7	Construction Management Plan (details)
	<p>CONDITION: No development shall take place on site unless and until a Construction Method Statement has been submitted to and approved in writing by the local planning authority. The statement shall provide details of:</p> <ul style="list-style-type: none"> a. the parking of vehicles of site operatives and visitors; b. loading and unloading of plant and materials; c. storage of plant and materials used in constructing the development; d. the erection and maintenance of any scaffolding or security hoardings; e. wheel washing facilities; and f. measures to control the emission of dust and dirt during construction. <p>The development shall be carried out strictly in accordance with the Statement as approved throughout the construction period.</p> <p>REASON: To protect the amenity of neighbouring occupiers.</p>

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 2019 and Planning Policy Guidance (PPG) seek to secure growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF and PPG are material considerations and have been taken into account as part of the assessment of these proposals.

2. Development Plan

The Development Plan is comprised of the London Plan 2016, the Islington Core Strategy 2011, the Islington Development Management Policies 2013, the Finsbury Local Plan 2013 and the Site Allocations 2013.

A. The London Plan 2016 - Spatial Development Strategy for Greater London

Policy 7.4	Local character
Policy 7.6	Architecture
Policy 7.8	Heritage assets and archaeology

B. Islington Core Strategy 2011

Policy CS8	Enhancing Islington's character
Policy CS9	Protecting and enhancing Islington's built and historic environment

C. Islington Development Management Policies 2013

Policy DM2.1	Design
Policy DM2.3	Heritage

3. Designations

Grade II listed building (church and presbytery)
St Mary Magdalene Conservation Area

4. Supplementary Planning Guidance (SPGs) / Documents (SPDs)

The London Plan

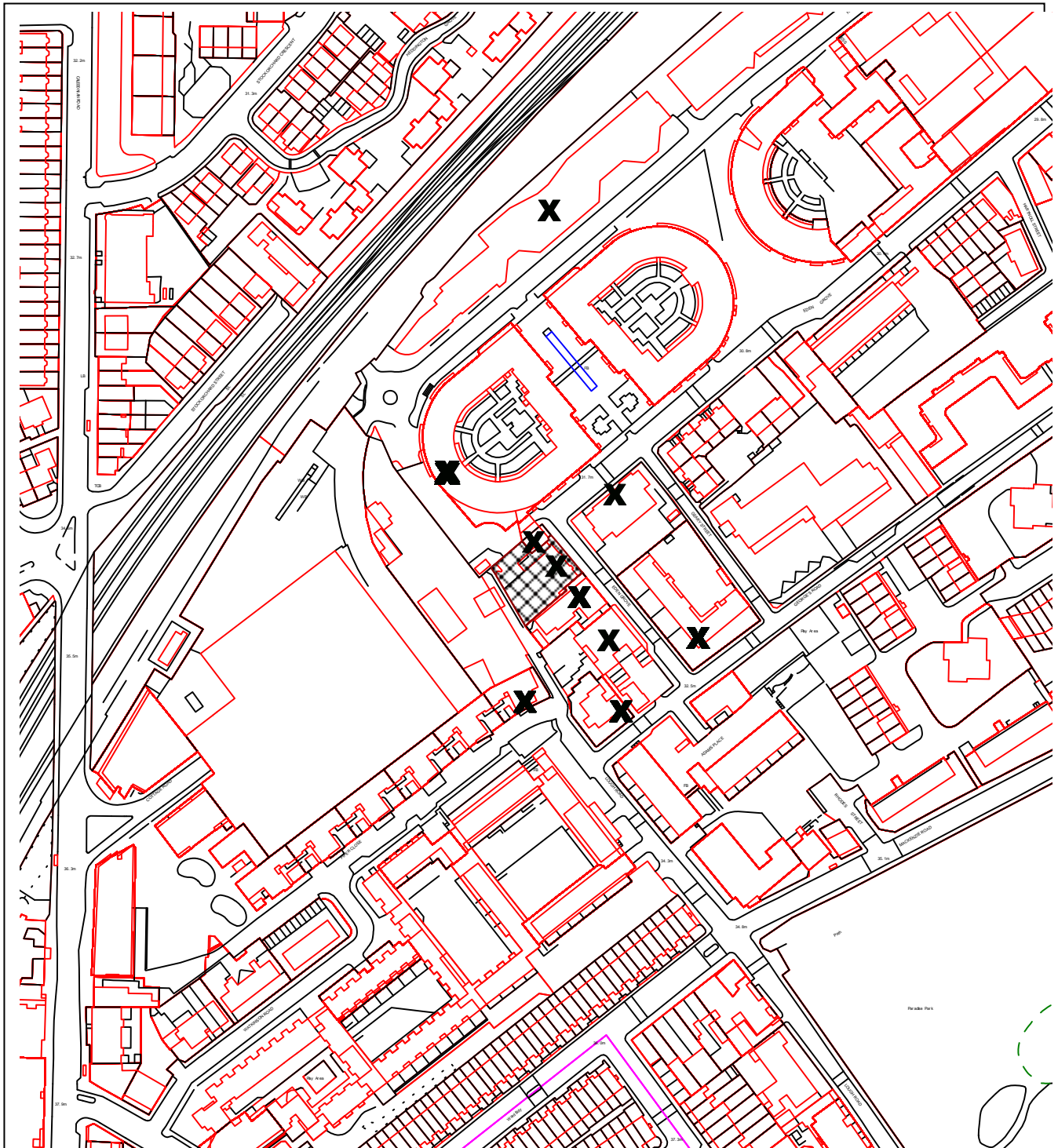
Character and Context (2014)

Islington Development Plan

Islington Urban Design Guide (2017)

St Mary Magdalene Conservation Area Design Guidelines (2002)

ISLINGTON



This material has been reproduced from Ordnance Survey digital map data with the permission of the controller of Her Majesty's Stationery Office, © Crown Copyright.
P2018/1453/FUL

This page is intentionally left blank

PLANNING COMMITTEE REPORT

Development Management Service
 Planning and Development Division
 Environment and Regeneration Department

PLANNING SUB COMMITTEE A		AGENDA ITEM NO:	B4
Date:	3 rd September	NON-EXEMPT	

Application number	P2019/0183/FUL
Application type	Full Planning Application
Ward	Bunhill
Listed building	Not Listed
Conservation area	Within 50m of the Bunhill Fields and Finsbury Square Conservation Area
Development Plan Context	<ul style="list-style-type: none"> - Core Strategy Key Area – Bunhill and Clerkenwell; - Employment Priority Areas (General); - Central Activities Zone; - Archaeological Priority Area - Moorfields; - Finsbury Local Plan Area – Old Street (BC3); - Article 4 Direction A1-A2; - Article 4 Direction B1(c)-C3 - Within 50m of the Bunhill Fields Cemetery – Grade I registered.
Licensing Implications	None
Site Address	IDT House, 44 Featherstone Street, Islington, London, EC1Y 8RN
Proposal	Single-storey extension at sixth floor level and partial infill of lightwell to the rear of the existing building and internal and external refurbishments to provide additional B1 floorspace and new facade appearance and associated cycle parking.

Case Officer	Owen Griffiths
Applicant	C/O Agent
Agent	DP9 Ltd

1. RECOMMENDATION

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

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

2. SITE PLAN (site outlined in red)



Image 1 – Site Location Plan

3. PHOTOS OF SITE/STREET



3.1 Image 2 - Aerial View of Site



3.2 Image 3 - Upper Level View of Building



3.3 Image 4 - Street View of Building



3.4 Image 5 - Rear View of Building from Adjoining Courtyard (48-50 Featherstone Street)



3.5 Image 6 - Rear Servicing and Parking Area (Undercroft)

4. SUMMARY

- 4.1 Permission is sought for a single-storey extension at sixth floor level (seventh storey), the partial infill of a lightwell to the rear of the existing building, internal and external refurbishments to provide additional B1 floorspace and a new facade appearance.
- 4.2 The height of the proposed seven storey building will be 25.2m with a small plant area on the seventh storey roof taking the total height of the building to 25.9m. The majority of the existing roof top plant is being consolidated and relocated to an area that currently contains plant machinery at first floor level to the rear of the building.
- 4.3 The development will provide a financial contribution towards employment and training (£11,055) as well as construction training (£5,000). These requirements will be secured via a Section 106 agreement between the applicant and the council.
- 4.4 The overall design of the development has been assessed over its quality, effect on the neighbouring conservation area and Grade I registered heritage asset - The Bunhill Fields Burial Ground. It is concluded that the design is of a sufficiently high quality to be permissible and represents a significant improvement over the existing situation. The level of harm caused to surrounding heritage has been concluded to be less than substantial, at the lowest end of the scale, and the public benefits of the development outweigh the minimal harm that is being caused.
- 4.5 Potential effects on neighbouring amenity are being deemed to be acceptable after amendments to the massing addressed initial concerns over sunlight and daylight implications for neighbouring occupiers. There are some breaches of daylight BRE guidance but this is mainly due to anomalous figures that are a result of an existing poor daylight situation due to the arrangement of fenestration underneath setback terrace areas. Other breaches of daylight BRE guidance (reductions between 20% and 30%) are considered to be acceptable in such a dense urban environment. The development is fully compliant with BRE Guidance in terms of Sunlight. Plant noise and hours of use for the terrace area will be controlled to further protect neighbouring amenity.
- 4.6 An adequate servicing arrangement has been agreed and the building incorporates sufficient inclusive design measures.

5. SITE AND SURROUNDING

- 5.1 Featherstone Street is located to the west of City Road and to the south of Old Street. The application site is located on the northern side of Featherstone Street and currently consists of a mid to late 20th century office building. The current development is six storeys in height (21.9m) with the sixth storey being recessed from the front elevation with an associated front facing terrace. There are various items of plant machinery on the roofspace taking the total height of the building to 26.4m.
- 5.2 The existing façade of the building facing Featherstone Street is formed of dark grey masonry at ground floor level with light grey metallic panelling on the upper levels and horizontal louvered sunshades. The primary façade is broken up by a central projecting curved glazed column, starting at second floor level and extending up to the top of the building. A stepped entrance is provided to the east of the site and to the west there is a side road serving access to the rear servicing and parking area for both 44 Featherstone Street and 48-50 Featherstone Street, a mixed-use office and residential development. The west façade has the same external appearance as the upper floors of the primary façade fronting Featherstone Street with light grey metallic panelling.

- 5.3 The surrounding built form is a mixture of commercial and residential developments between 4 and 7 storeys in height and there are examples of larger tower developments (above 30m in height) in the wider surrounding area such as the White Collar building (18 storey) on Old Street Roundabout.
- 5.4 To the east of the site and within the Bunhill Fields and Finsbury Square Conservation Area is a four-storey commercial building with a modern two storey extension (38-40 Featherstone Street). To the north of this building, 7-12 Mallow Street, are further mixed use buildings with office floorspace at ground and first floor level and residential accommodation on the upper floors. To the west of the site is 48-50 Featherstone Street, a mixed-use development that incorporates a 7-storey building that fronts Featherstone Street with commercial uses at ground floor level and residential accommodation above. To the rear of 48-50 Featherstone Street is adjoined 6 storey office buildings with an internal courtyard/parking area that shares access with the application site (44 Featherstone Street).
- 5.5 The southern side of Featherstone Street is residential in nature and immediately opposite the site is 15-18 Featherstone Street, a six-storey residential building. To the north of the site are commercial office buildings fronting Old Street.
- 5.6 Immediately adjacent to the east of the site is the Bunhill Fields and Finsbury Square Conservation Area and to the south, behind 15-23 Featherstone Street is the Bunhill Fields Burial Ground, a Grade I registered garden (designated heritage asset).
- 5.7 Featherstone Street has a one-way direction of travel for motor vehicles and on the north side of the road is a one-way segregated cycle lane going in the opposite direction to motor vehicles.

6. PROPOSAL

- 6.1 It is proposed to construct an additional seventh storey and to relocate various pieces of plant machinery to an existing roof area utilised for plant at first floor level. A small plant area and lift over run will remain on the new rationalised roofspace. The total height of the building will be reduced to 26m as parts of the existing plant took the total height of the building to 26.4m. There will be additional stepped infill extensions to the rear of the building, from ground to seventh storey levels.
- 6.2 Overall the office floorspace will be increased from 5,024sqm to 5,938sqm (GIA). The majority of this extra floorspace is being provided in the seventh storey extension but further floorspace is also being provided in the stepped infill areas to the rear of the building. In addition to this, the basement is being converted from ancillary storage space to usable office accommodation.
- 6.3 The main entrance to the building will be relocated to a more central location on the southern elevation and level access shall be provided into the building as well as a bespoke wheelchair lift to facilitate wheelchair access to the raised ground floor level. A further entrance to the building is being installed to the east of the site with internal voids on either side to allow light into the basement area. A further lightwell is proposed to the rear of the office floorspace to serve the basement.
- 6.4 The entire south elevation will be reconstructed with a black metal frame, charcoal render and green glazed ceramic tiles at ground floor level. This design approach will be continued onto the western, northern and eastern façades that will be rendered with matching grey/charcoal colour.

- 6.5 The reconstructed sixth storey floor and newly constructed seventh storey will be primarily glazed with black metal frames and incorporate set back terrace areas with metal balustrading to the Featherstone Street façade. The appearance of the top floor extension will continue around the building and there will be additional set back areas to the east and to the rear of the building with access provided only for maintenance.
- 6.6 Internally, various storage and plant areas in the basement will be removed and the new office floor space provided. The ground floor car parking and service area will be removed and replaced with cycle parking, including end-of-trip facilities (showers and lockers in the basement), refuse storage and a small plant area. One wheelchair parking space is also being provided, located on part the western façade at ground floor level, with access via the side access road that is shared with 48-50 Featherstone Street.

Revision 1

- 6.7 The scheme has been revised to address issues of sunlight and daylight to neighbouring properties.
- The seventh storey extension has been set back from Mallow Street by an additional 1.3m and the rear infill extension has been reconfigured. The rear infill extension now steps away from Mallow Street, from the fourth storey to the sixth storey, to reduce impacts on surrounding residential and office development.
 - The primary façade has been altered by removing a varied column of fenestration situated over the eastern entrance and the access doorways to the front facing terrace were altered to incorporate glazed sliding doorways.
 - Additional information was provided in terms of servicing and access during construction due to initial concerns that were raised by neighbouring residents. This includes the Logistics and Traffic Management Plan that demonstrates how access will be unaffected to the neighbouring courtyard to 48-50 Featherstone Street during the construction phase.

7. RELEVANT HISTORY:

PLANNING APPLICATIONS:

- 7.1 **P2013/1830/FUL** - Replacement of existing entrance door system and one ground floor window with new frameless double glazed door system and window, and installation of aluminium panelling with vinyl signage to the entrance. **APPROVED 06/08/2013**
- 7.2 **P060658** - Installation of replacement air handling unit on first floor plant terrace. **APPROVED 24/05/2006.**
- 7.3 **P010465** - Installation of wall mounted condenser at first floor level. **APPROVED 19/04/2001**
- 7.4 **961584** - Installation of roof mounted generator in acoustic housing. **APPROVED 22/10/1996**
- 7.5 **870637** – (41-46 Featherstone Street EC1) - Change of use from storage (Class B8) to offices (Class B1) 40 000 sq. ft. **APPROVED 22/06/1987**
- 7.6 **871078** - (41-46 Featherstone Street EC1) - External alterations and erection of an additional floor of 700 square metres. To be used for Class B1. **APPROVED 24/08/1987**

Monmouth House (19-23 Featherstone Street, London, EC1Y 8RN)

- 7.7 **P2015/3136/FUL** - Demolition of existing buildings and redevelopment of the site to provide a building of part 10, part 11 storeys fronting City Road and five storeys along Featherstone Street to provide 13,393sq.m. of office space (B1) including affordable workspace; 404sq.m. of retail (A1); together with ancillary hard and soft landscaping, revised vehicular access/egress, 302 cycle spaces, one disabled vehicular space, refuse/service arrangements and all other works associated with the development. This application may affect the character and appearance of a conservation area and the setting of a listed building. Town and Country Planning (Listed Building and Conservation Areas) Act 1990 (as amended). **APPROVED by the Former Mayor on 01/04/2016 – Currently under construction.**

8. CONSULTATION

Public Consultation

- 8.1 Letters were sent to occupants of 226 adjoining and nearby properties at Old Street, Featherstone Street, Mallow Street and Martha's Buildings on the 12th February 2019. A site notice and press advert were displayed on 14th February 2019. The public consultation of the application therefore expired on the 10th March 2019, however it is the Council's practice to continue to consider representations made up until the date of a decision.
- 8.2 The application underwent a second round of consultation, to surrounding neighbours on a 14-day basis, on the 20th June 2019 to inform objectors of the amendments to the scheme described in paragraph 6.7.
- 8.3 During the first round of consultation five objections were received. Three of these were from residents in the adjoining building 48-50 Featherstone Street. All three objectors cited issues of access to the rear parking/servicing area for both residents and the emergency service vehicles. The applicant subsequently provided a Logistics and Traffic Management Plan to address these issues. **This issue is addressed from paragraph 10.47.**
- 8.4 Two objections were received that highlighted the sunlight and daylight implications to their properties. One objector was from a residential property on the opposite side of Featherstone Street, Matisse Court (15-18 Featherstone Street) and the other was from a mixed-use building with office uses on the ground and first floor (9-10 Mallow Street). **Sunlight and Daylight is addressed from paragraph 10.25.**
- 8.5 The objector from 9 Mallow Street raised concerns due to their property not being specifically referenced in the body of the applicant's daylight report despite the rest of the building seeing high losses in terms of sunlight and daylight. The infill area was also unclear to the objector and it was felt that this could significantly close in the space immediately outside the window to their office. **This issue is addressed in paragraph 10.37.**
- 8.6 The objector at 15-18 Featherstone Street questioned the accuracy of the sunlight/daylight report as not all windows were shown on the windows map and in their view not all room/windows had been accurately assessed. The objector notes that the report also shows reductions above 20% which does not comply with BRE guidance and the effect on their balcony has not been assessed. **Sunlight and Daylight is addressed from paragraph 10.25.**

- 8.7 The objector from 15-18 Featherstone Street also highlighted potential privacy impacts due to the proposed terrace areas facing their property. **Privacy and overlooking impacts are addressed from paragraph 10.42.**
- 8.8 The appearance of the black façade was also questioned by the objector at 15-18 Featherstone Street as they consider it to not be in keeping with other buildings and that the dark appearance would contribute to an enclosing effect. It was also mentioned that the building would be out of keeping with other buildings on the street due to the increased massing and queried how large the plant area on the sixth floor roofspace would be. **Quality of design is considered at paragraph 10.8**
- 8.9 During the second round of consultation the same objector from 15-18 Featherstone Street provided further comments that disputed the accuracy of the sunlight and daylight assessment, mainly that the window arrangement to the top floor of the building is incorrect. Additional reasons for objections remained from their initial consultation response.

External Consultees

- 8.10 TfL Spatial Planning – No Comment

Internal Consultees

- 8.11 Transport and Highways – Servicing the building via parking on Featherstone Street is not suitable for collection/deliveries of large or heavy items. The collection and delivery of such heavy/large items should be from the onsite access way to the western side of the building. A banksman should be in attendance to ensure any larger servicing vehicles can safely manoeuvre over the cycle lane and into the access way.
- 8.12 Inclusive Design Officer –
- Accessible bathrooms should include a 1500mm turning circle
 - One cubicle per floor should be accessible to ambulant disabled persons
 - There should be a 1500mm clear landing after each flight of stairs.
 - The building is over 24m and therefore one lift should be a firefighting lift. Two refuge areas per floor are recommended.
 - Entry door to service/cycle area needs to be powered if heavier than 30N.
 - Accessible showers in the basement: the circulation arrangement from the lift is very tight to access the shower.
 - Additional disabled parking should be secured by way of a S106 agreement.
- 8.13 Conservation and Design Officer:
- The alterations to the façade of the building are welcomed as the current building has few notable aesthetical qualities. The inclusion of a central staircase to the front elevation with varying fenestration to the rest of the façade should be removed. This is attempting to acknowledge the existing projecting curved glazed column but this element of the existing building need not be retained.

- The south elevation drawing gives the extension a slightly top-heavy appearance but as this view is not possible from public views and very limited private views there will not be a significant impact on the townscape. The top floors are stepped back and when viewed from the street level, the massing would have a more legible appearance when read together with the surrounding built form.
- Given that there is an existing front facing terrace with balustrading, this element of the proposal does not raise a significant concern as there will be an improvement over the existing situation.
- The proposal causes a neutral-to-small amount of harm to the setting of the Bunhill Fields Burial Ground by reason of its visibility that is read against a much taller building beyond the application site. At the very most this harm would be less than substantial harm, at the lowest end of the scale, and should be weighed against any public benefits of the proposal.

8.14 Public Protection:

- Advise condition in relation to plant noise
- The development is in close proximity to the Monmouth House (**P2015/3136/FUL**) redevelopment, with the Old Street gyratory works about to start also. Featherstone Street has a cycle route and we have to consider the cumulative impact of these developments. I would advise a CMP is conditioned to mitigate those impacts and ensure that the site work closely with the other projects to minimise that cumulative effect.

Officer comment: *The applicant subsequently submitted a CMP but the Public Protection Officer requested for the condition to remain as the CMP did not address cumulative impacts and it was reiterated that a coordinated approach needs to be struck between 44 Featherstone Street and Monmouth house to ensure the cumulative impacts of the developments do not have unacceptable effect existing occupiers*

9. RELEVANT STATUTORY DUTIES & DEVELOPMENT PLAN CONSIDERATIONS & POLICIES

9.1 Islington Council (Planning Sub-Committee A), in determining the planning application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004) (Note: that the relevant Development Plan is the London Plan and Islington's Local Plan, including adopted Supplementary Planning Guidance.) and;
- As the development is adjacent to a conservation area(s), the Council also has a statutory duty in that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (s72(1)).

9.2 National Planning Policy Framework (NPPF): Paragraph 11 states: "at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means: approving development proposals that accord with the development plan without delay.

- 9.3 At paragraph 8 the NPPF states: “that sustainable development has an economic, social and environmental role”.
- 9.4 Since March 2014 Planning Practice Guidance for England has been published online.
- 9.5 In considering the planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
- 9.6 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:
- Article 1 of the First Protocol: Protection of property. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.
 - Article 14: Prohibition of discrimination. The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.
- 9.7 Members of the Planning Sub-Committee must be aware of the rights contained in the Convention (particularly those set out above) when making any Planning decisions. However, most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted. Any interference with any of the rights contained in the Convention must be sanctioned by law and be aimed at pursuing a legitimate aim and must go no further than is necessary and be proportionate.
- 9.8 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. The Committee must be mindful of this duty inter alia when determining all planning applications. In particular, the Committee must pay due regard to the need to:
- (1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
 - (2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - (3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

National Guidance

- 9.9 The National Planning Policy Framework 2019 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.

Development Plan

9.10 The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013. Some weight is also attributable to the Draft London Plan (2018). The policies of the Development Plan are considered relevant to this application and are listed at Appendix 2 to this report.

Designations

9.11 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:

- Core Strategy Key Area – Bunhill and Clerkenwell;
- Employment Priority Areas (General);
- Central Activities Zone;
- Archaeological Priority Area - Moorfields;
- Finsbury Local Plan Area – Old Street (BC3)
- Article 4 Direction A1-A2;
- Article 4 Direction B1(c)-C3

Supplementary Planning Guidance (SPG) / Document (SPD)

9.12 The SPGs and/or SPDs which are considered relevant are listed in Appendix 2.

10. ASSESSMENT

10.1 The main issues arising from this proposal relate to:

- Land Use
- Design and Conservation
- Neighbouring Amenity
- Highways and Transportation
- Inclusive Design
- Energy Efficiency and Renewable Energy
- Planning Obligations and CIL

Land-use

10.2 Policy CS13 (Part A) of the Islington Core Strategy encourages new employment floorspace and business floorspace that is located in the CAZ where access to public transport is greatest. New business floorspace should be flexible to meet future business needs and should provide a range of unit types including those suitable for SME's. Part C of CS13 requires office developments providing over 500sqm (GEA) to provide on-site construction training opportunities as well as jobs and training opportunities, including apprenticeships, and contributions towards childcare facilities where there is a proven need.

10.3 Policy DM5.2 (Part A) of the Islington Development Management Policies states that proposals resulting in a loss or reduction of business floorspace will be refused and this is reiterated in Policy BC8 of the Finsbury Local Plan: 'no net loss of business floorspace will be permitted'.

- 10.4 Policy BC3 of the Finsbury Local Plan relates to the Old Street area in which the application site is located. Policy BC3 seeks to enhance the Old Street area by making it a distinctive, high quality, diverse and vibrant commercial destination within central London. The environmental quality of the roundabout will be transformed through coordinated public and private investment, with complementary improvements to neighbouring residential areas, including, inter alia, business uses, including work spaces suitable for occupation by small and micro enterprises, and supporting uses.
- 10.5 The development proposes 914sqm (GIA) of additional office B1(a) floorspace. In addition, ancillary storage areas in the basement and servicing areas at ground floor level are being converted to office floorspace and therefore there will be a net increase in usable floor area above the amount being provided in the extended areas of the building. The development includes a Net Internal Area uplift of 617sqm.
- 10.6 The majority of the new floorspace in the new seventh storey is shown as being an open plan office area with windows on all four sides. It would therefore be possible to divide the space up to provide different unit types with the potential for small units that could be occupied by SME's, in accordance with Policy BC3 and Part A of CS13. This approach is commensurate with a minor application that proposes less than 1,000sqm (GIA) of new office floorspace. In terms of Part C of CS13, obligations will be secured via a S106 agreement to provide a financial contribution towards employment and training (£11,055) as well as construction training (£5,000). The heads of terms for the S106 are listed under Appendix 3.
- 10.7 As the development is proposing additional office floorspace, with no change of use or loss of office floorspace, the development is considered to be acceptable in land use terms and is in compliance with policies CS13 of the Islington's Local Plan, DM5.2 Islington's Development Management Policies and BC8 of the Finsbury Local Plan. The obligations that will be secured will also ensure that the development is compliant with the aspirations of BC3 as well as part C of CS13.

Design and Conservation

- 10.8 Paragraph 193 of the NPPF (2019) states that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Furthermore, at paragraph 196: 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.9 London-wide planning policies relevant to design and conservation are set out in Chapter 7 of the London Plan, and the Mayor of London's Character and Context SPG is also relevant. At the local level, Policy CS9 of Islington's Core Strategy (CS) 2011, Policy BC of the Finsbury Local Plan (2013) and Policy DM2.1 of Islington's Development Management Policies 2013 accord with the National Planning Policy Framework (NPPF) in seeking to sustain and enhance Islington's built environment. Taken together, they seek to ensure that proposed development responds positively to existing buildings, the streetscape and the wider context, including local architecture and character, surrounding heritage assets, and locally distinctive patterns of development.
- 10.10 Policy DM2.3 states that Islington's historic environment is an irreplaceable resource and the council will ensure that the borough's heritage assets are conserved and enhanced in a manner appropriate to their significance. The Bunhill Fields and Finsbury Square Conservation Area Guidance highlights the special character that the area possesses and that the conservation area contains a number of famous historic buildings and open spaces. The application site is not within the Bunhill Fields and Finsbury Square Conservation Area but it borders the Conservation Area to the east (Image 8 below) and therefore any potential impact that the development may have on the character and appearance of the area must be assessed.

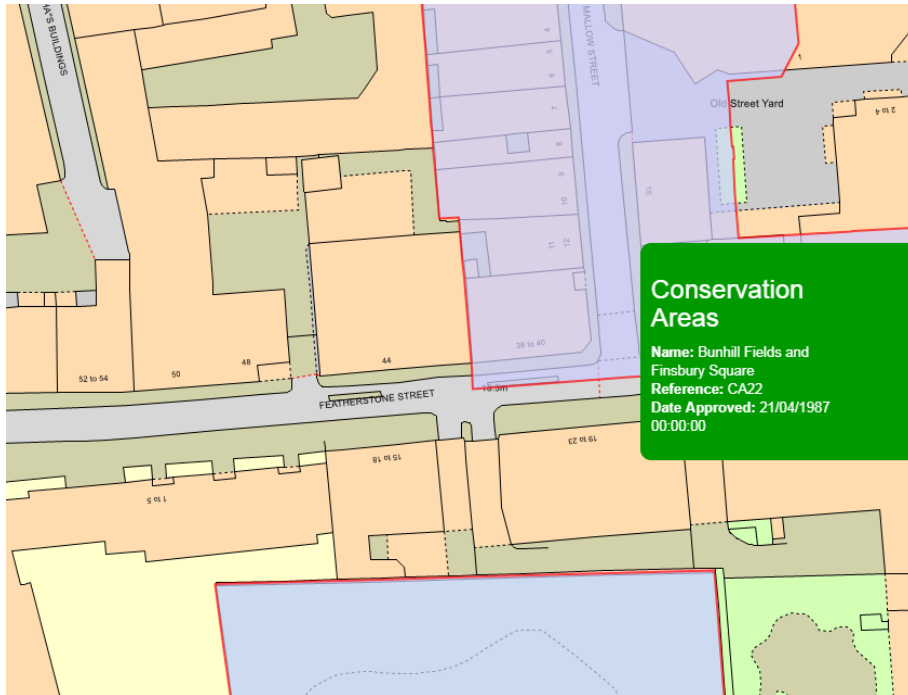


Image 7 – Map of Application Site and Bordering Conservation Area.

10.11 The development incorporates a new façade to the primary elevation of Featherstone Street and the west façade that fronts a shared access road with the neighbouring property, 48-50 Featherstone Street. The existing façade to these two elevations is of a mid-late 20th century design that bears little architectural significance and does not make a particularly positive contribution to the streetscape or adjoining conservation area. The ground floor is clad in granite with an art deco appearance that has some fine detailing and the upper levels are clad in mat metallic grey with a protruding glazed curved column.

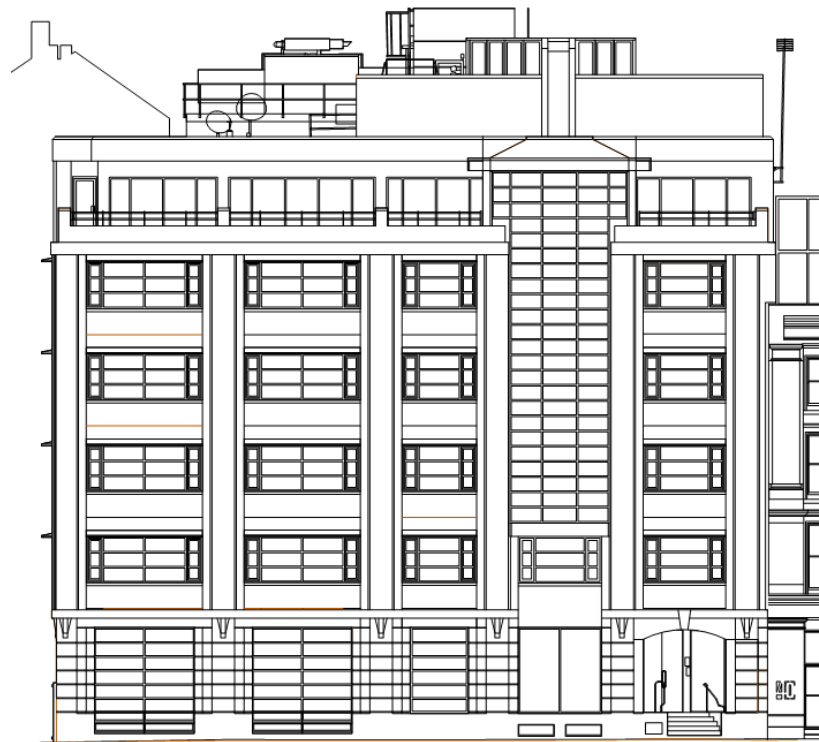


Image 8 – Existing Front Elevation

- 10.12 The entire façade to both the south and west elevations are to be completely reclad. At ground floor level the Featherstone Street elevation will include enlarged windows and glazed green tiling. The main entrance will also be relocated to the west and level access provided. This ground floor treatment will wrap around onto the side access road by a single bay. The upper floors to Featherstone Street will include horizontal metal fins with dark grey matt metal panels, charcoal render columns and black aluminium window frames. The side elevation (to the access road) will be rendered in a charcoal colour with matching black aluminium window frames.
- 10.13 The top floor extensions at fifth and sixth floor levels will continue the dark grey metallic fins and panelling from the lower levels but more glazing will be installed with sliding doorways that provide access to the two front facing terrace areas and associated metal balustrading.
- 10.14 The proposed redesign of the building with new façade treatments, replacement extension at fifth floor level and new extension at sixth floor level are considered to be of a satisfactory design and is an improvement over the existing situation. Currently the roof top plant area that sits on top of the fifth floor represents a visually intrusive element to the building that is visible from the upper levels of surrounding buildings. It is clear that this plant has been added to over the years with little aesthetic consideration as the rooftop is only partially visible from very limited views. Despite this, the proposal to remove the rooftop plant and replace it with a sixth floor roof extension will enhance the visual appearance of the building, from both public and private views. Concern was raised from the Design and Conservation officer over the top heavy appearance of the extension in elevation view. However, this view does not accurately portray how both the sixth and seventh storeys are set back and taking this into consideration, along with the fact that this view is only possible from a limited number of private views, the slightly higher proportion of the top floor is acceptable and does not represent an unacceptable effect on the townscape nor have a negative effect on the adjoining conservation area.

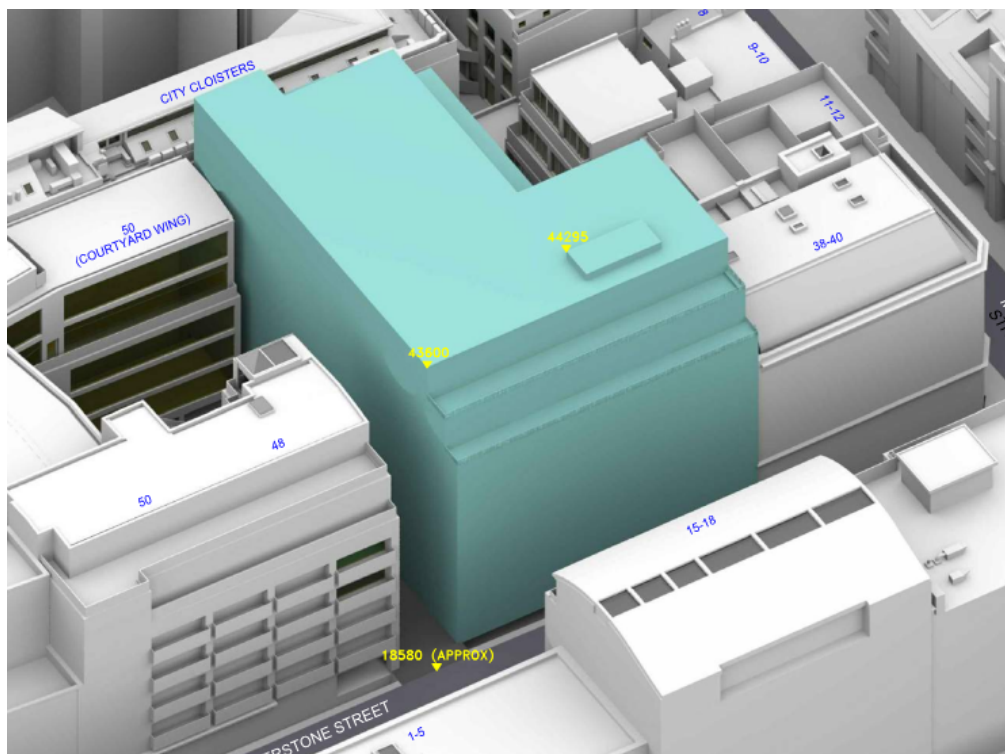


Image 11 – Front Massing Diagram

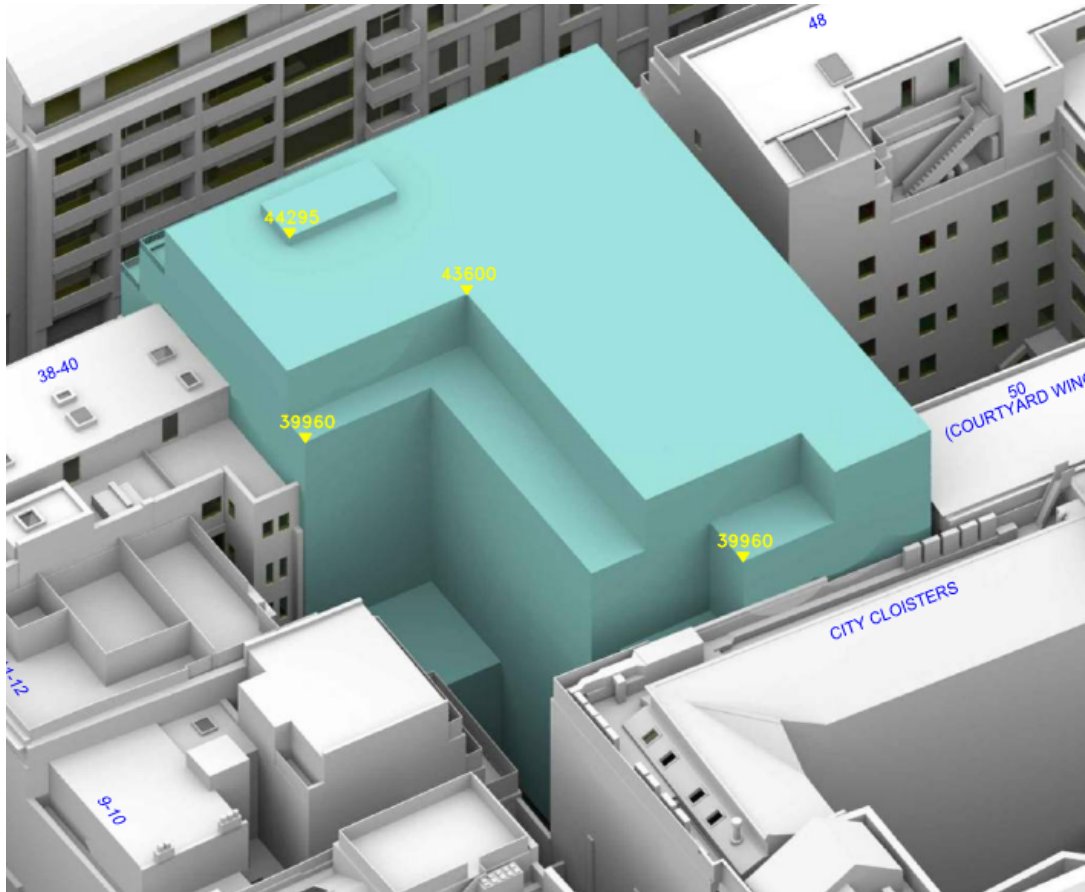


Image 12 – Rear Massing Diagram

- 10.15 The application site is within close proximity to the Grade I registered (designated heritage asset) – the Bunhill Fields Burial Ground that is situated to the south, behind 15-23 Featherstone Street (on the opposite side of the road top number 44). Policy BC3 of the Finsbury Local Plan Part D states ‘New buildings adjacent to the Grade I listed Bunhill Fields Cemetery should exhibit a scale, massing and design which enhances its heritage value, and should also incorporate design measures that enhance the biodiversity value of adjacent areas.
- 10.16 The applicant has provided views from the burial ground of the proposed development within the submitted Design and Access Statement. The imagery confirms that the development at 44 Featherstone Street will be obscured from certain views due to the construction at Monmouth House (19-23 Featherstone Street), to the east of the current application site, that includes a five storey construction along Featherstone Street. The statement also notes that there will be a view of the extension from the west of the burial ground but an existing building in the background will lessen the impacts to this view and that the extension does not protrude beyond the built form of this building behind. It should also be noted that the existing roof line of the building is already in view from this position and the additional visibility of the extension would represent minimal harm to the to the Grade I heritage asset.
- 10.17 Overall, it is considered that the effect the development will have on heritage amounts to, at worst, less than substantial harm, being at the lower end of the scale in this regard. The roof massing to 44 Featherstone Street is being rationalised and the building is being reclad to provide a contemporary aesthetical appearance. Furthermore, there will be further public benefits provided from the development via increased office floorspace and the associated employment and economic benefits this will bring to the area. Therefore, any harm that is being caused to the surrounding designated heritage assets is being sufficiently outweighed by the public benefits that will be realised should the development be approved and implemented.

10.18 In terms of Policy BC3 of the Finsbury Local Plan, the application site is not adjacent to the Grade 1 registered Bunhill Fields Burial Grounds but it within close proximity with a very minimal area of the roof extension being visible from the cemetery (Image 8 below). The proposed development at 44 Featherstone Street will also investigate the feasibility of installing a green/brown biodiverse roof by the requirements of condition 13 which can enhance the biodiversity value of the area should the building be structurally capable of supporting a green/brown roof.



1 | Existing. A small portion of the existing 44 Featherstone Street can be seen behind the newly completed residential scheme 'The Featherstone'.

Image 13 - Extract from section 4.7 of the Design and Access Statement



1 | Proposed. The extents of the new roof are shown in this view. The volume of 44 Featherstone street does not protrude beyond outline of the Bower.

Image 14 - Extract from section 4.7 of the Design and Access Statement

10.19 Overall, the design amendments to the building at 44 Featherstone Street are considered to be of a sufficiently high quality and represent a significant improvement over the existing situation. The proposed extension and recladding to the building have responded positively to the surrounding built form and the roof top extension has been sufficiently set back as to not detract from the streetscape. The use of metal framework with predominant glazing will give the extension a light weight appearance and the general materiality of the new facades are considered to be of a high standard that will not detract from the character or the appearance of the neighbouring conservation area, the surrounding streetscape or the setting of the Grade I registered heritage asset, causing only minimal harm to surrounding heritage. It is therefore concluded that the proposals, in terms of design and conservation complies with policy CS9, DM2.1 and DM2.3 as well as the principles of the NPPF.

10.20 In accordance with Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990, in assessing the proposals hereby under consideration, special regard has been paid to the desirability of preserving or enhancing the character or appearance of the conservation area and the Grade I listed heritage asset.

Neighbouring Amenity

10.21 Policy 7.6 of the London Plan provides that development should not cause unacceptable harm to the amenity of surrounding properties, particularly residential buildings. This is reflected at local level in Policy DM2.1 of the Islington Development Management Policies, which requires developments to provide a good level of amenity, including consideration of noise, disturbance, hours of operation, vibration, pollution, overshadowing, overlooking, privacy, sunlight and daylight, over-dominance, sense of enclosure and outlook.

Noise

10.22 It is proposed to remove the plant machinery from the existing sixth floor roof area and install modern efficient plant equipment at first floor level location to the side of the building facing Mallow Street, where various pieces of plant machinery are currently located. This area is in close proximity to existing residential premises at 9-12 Mallow Street.

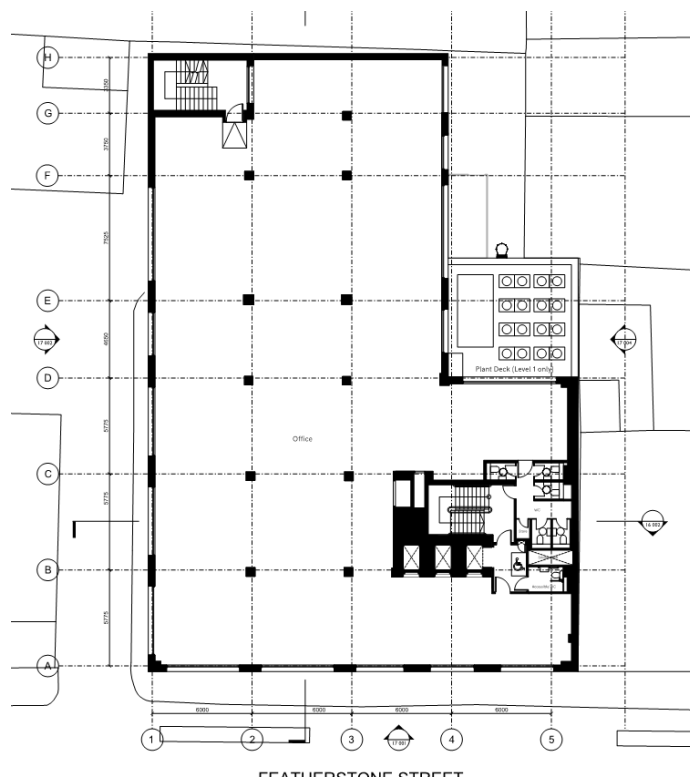


Image 15 – Proposed First Floor Plan

- 10.23 The plant at first floor level will be surrounded by an acoustic enclosure, the details of which will be submitted to the council in line with the requirements of condition to ensure the plant machinery in this area does not adversely affect surrounding occupiers a further condition will be included that requires the plant machinery to operate at least 5dB(A) below the background noise level.
- 10.24 An additional plant area will be positioned on the top floor extension next to the lift overrun. The sound emitted from this plant area will also be controlled via condition to protect the amenities of surrounding occupiers.

Daylight/Sunlight

- 10.25 When assessing the daylight and sunlight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. The application has been submitted with a daylight and sunlight assessment dated December 2018 and a subsequent updated version, dated May 2019, was provided due to rooftop massing amendments. Concerns were raised to the applicant over the results in the original report and two objections were received in relation to sunlight and daylight impacts over the design originally proposed. Due to this, the massing of the extended areas were amended (para 6.5) and the application went out for public consultation with the updated May 2019 report. One of the objectors also questioned the accuracy of the report as the window shown to the top floor of 15-18 Featherstone Street serves two room whereas in the report it is depicted as a single window serving a single room.
- 10.26 The May 2019 report provided a number of results that raised concerns in terms of the overall light reductions to surrounding properties and further information was requested so that an accurate assessment could be conducted, such as exact room uses and daylight distribution diagrams for the most affected properties. The inaccuracies highlighted by one of the objectors were also raised to the applicant and their sunlight/daylight consultant and it was requested for the massing to be reconfigured and updated report provided to ensure the light reductions to surrounding properties are reduced to within acceptable limits. The applicant subsequently provided an updated report dated July 2019 Version 1 and the following assessment is based on this latest report.
- 10.27 The assessments were carried out with reference to the 2011 Building Research Establishment (BRE) guidelines which are accepted as the relevant guidance. The supporting text to policy DM2.1 identifies that the BRE 'provides guidance on site layout planning to achieve good sun lighting and day lighting'.
- 10.28 Where these guidelines are exceeded then sunlighting and/or daylighting may be adversely affected. The BRE Guidelines provide numerical guidelines, the document though emphasizes that advice given is not mandatory and the guide should not be seen as an instrument of planning policy, these (numerical guidelines) are to be interpreted flexibly since natural lighting is only one of many factors in site layout design.

Daylight

- 10.29 The BRE Guidelines stipulate that there should be no real noticeable loss of daylight provided that either:

The Vertical Sky Component (VSC) as measured at the centre point of a window is greater than 27%; or the VSC is not reduced by greater than 20% of its original value. (Skylight);

And

The daylight distribution, as measured by the No Sky Line (NSL) test where the percentage of floor area receiving light is measured, is not reduced by greater than 20% of its original value.

10.30 The July 2019 report identifies a 94% pass rate (217 of 230) for daylight when using the VSC assessment methodology. All of the 13 windows that fail the VSC test (having a reduction of more than 20%) have existing VSC values below 10% (apart from W1/304 to 48 Featherstone Street – 10.65%) and 8 of the 13 have existing values below 1%. Due to the low existing VSC levels, the results provide reduction figures above 20% but the perceptible reduction in light will be negligible given the low existing daylight figures. It should also be noted that 39 windows will experience improvements in VSC but similarly all these improvements are to windows with low existing values or the gains themselves are very low. The windows that fail the strict application of BRE guidance are set out in the following tables:

Address	Window	Room Use	VSC (existing)	VSC (proposed)	VSC Reduction (%)
48 Featherstone Street	W1/303	LKD	6.32	4.93	21.99
	W1/304	LKD	10.65	7.53	29.3
15-18 Featherstone Street	W7/341	Living Room	0.88	0.68	22.73
	W6/343	Living Room	0.17	0.12	29.41
	W9/343	Living Room	0.21	0.15	28.57
	W11/343	LKD	0.29	0.22	24.14
	W4/344	Living Room	0.10	0.07	30.00
	W6/344	Living Room	0.25	0.19	24.00
	W9/344	Living Room	0.80	0.26	67.50
	W11/344	LKD	0.89	0.31	65.17
	W14/344	LKD	0.43	0.12	72.09
	W16/344	LKD	0.20	0.12	40.00

Table 1: VSC Results over 20%

- 10.31 Looking at the losses seen to 48 Featherstone Street, the two windows which will see reductions above 20% are small side windows on the east elevation facing the development site at 44 Featherstone Street. The windows will see reductions of 21.99% and 29.3% on the third and fourth floor respectively. These windows serve as secondary windows to living/kitchen/dining rooms with the primary window to these rooms facing south towards Featherstone Street. These primary windows (W8/303 and W8/304) are unaffected by the development at 44 Featherstone Street and have no loss in VSC.
- 10.32 BRE guidance states (paragraph 2.2.11): 'Existing widows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight'.
- 10.33 Turning to 15-18 Featherstone Street opposite the development site, it is evident that the high VSC losses are due to the poor existing situation, with all windows having an existing VSC level below 1%. This is due to the arrangement of the windows to the building, some of which are set back from the façade of the building due to inset terrace areas. The worst effected windows are tucked underneath balconies to the units above and this is resulting in poor existing VSC values. Furthermore, the rooms at 15-18 Featherstone Street that have windows that fall below 20% are served by multiple widows (seven) and therefore the rooms will still benefit from sufficient VSC levels from the remaining windows that comply with BRE guidance.
- 10.34 The daylight distribution results have been provided in the July 2019 report, including the existing v proposed contour lines for each effected room. Of 112 rooms tested 110 pass (98%) the strict application of BRE guidance and 7 rooms will experience an improvement over the existing situation with the proposed development in place.
- 10.35 The two rooms that will be affected beyond the BRE guidance limit of 20% are rooms R1/62 to 9-10 Mallow Street (28.4%) and R3/344 to 15-18 Featherstone Street (22.3%).

Address	Room	Whole room SQF	Existing DD	Proposed DD	Loss SQF	Reduction %
9-10 Mallow Street	R1/62 (bedroom)	169.1	112.7	80.7	32.0	28.4
15-18 Featherstone Street	R3/344 (LKD)	255.7	76.1	59.1	17.0	22.3

Table 2: Daylight Distribution results over 20% reduction

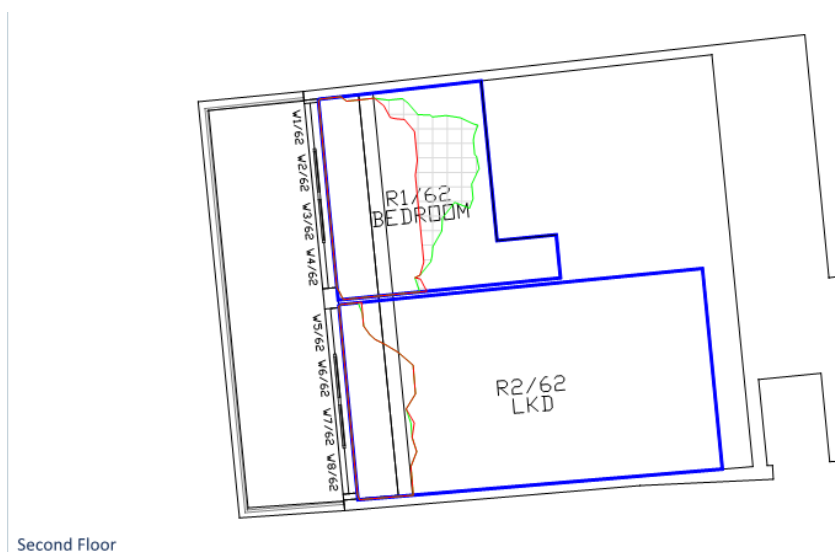


Image 16 – Daylight Distribution Contour Lines for 9-10 Mallow Street

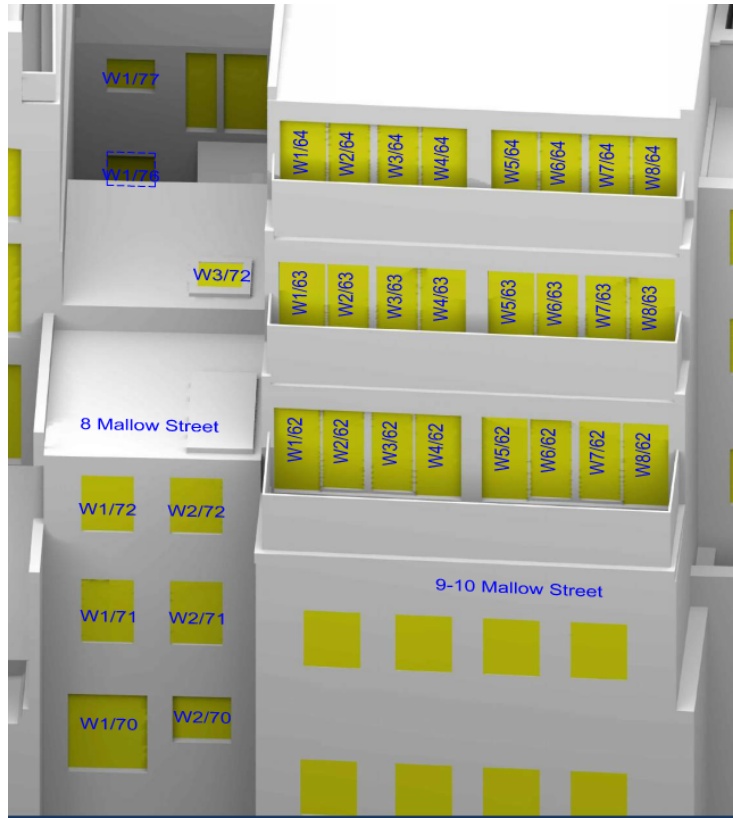


Image 17 – Windows Map for 9-10 Mallow Street.

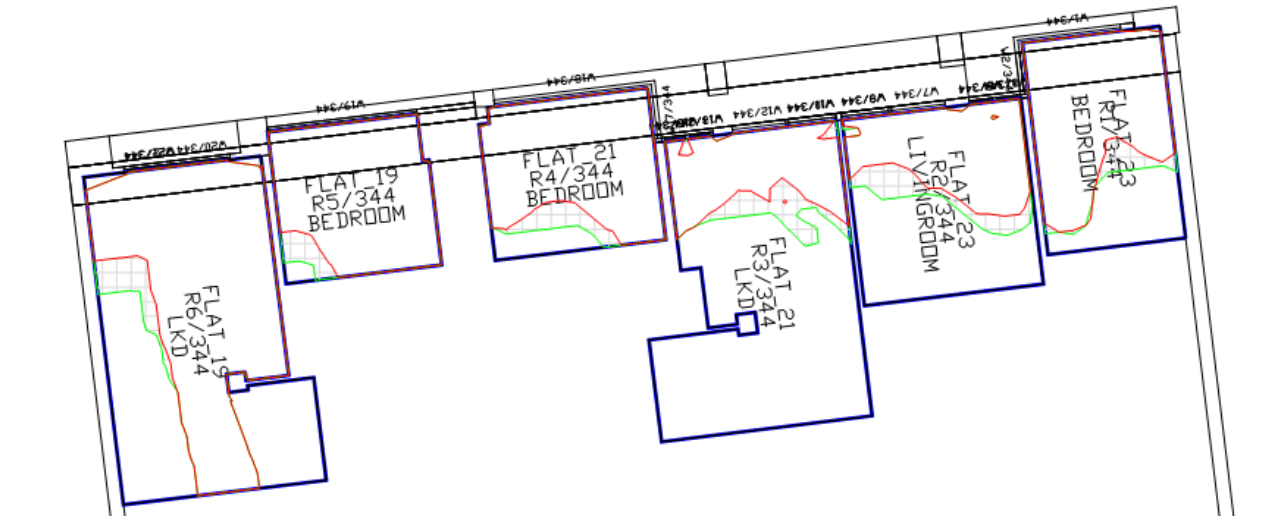


Image 18 - Daylight Distribution Contour Line for 15-18 Featherstone Street Fourth Floor.



Image 19 – Windows Map for 15-18 Featherstone Street.

- 10.36 The contour lines for these two rooms indicate that while the reductions are above the 20% figure suggested by BRE guidance, the rooms will not be impacted to such a degree that would be detrimental to the amenity of the residents of these units. The effected room to 9-10 Mallow Street is a bedroom where there is more flexibility when applying BRE guidance as main habitable rooms (living rooms) are of most concern when considering acceptable light reductions. The reduction of 28.4% is therefore acceptable in this instance as it still falls below 30% which is often deemed acceptable in a dense urban environment, such is the case with the area to the rear of 9-10 Mallow Street. The reduction figure of 22.3% at 15-18 Featherstone is sufficiently close to the 20% guidance figure as to also be deemed acceptable in this instance.
- 10.37 An objection has been received from an office unit at 9-10 Mallow Street, raising concern over the potential effect on the working environment at this property due to reduced sunlight and daylight. The property is listed under appendix 3 (windows map) of the updated report as W1-W4/60 9-10 Mallow Street (drawing number P1978/WM/02 Rel:10). BRE guidance prioritizes the effect on residential units but it does state that the guidance can be applied to ‘some office’ development (Paragraph 2.2.2 of the 2011 BRE Report).
- 10.38 In spite of the lack of numerical results available, the potential effect on the office units are considered to be acceptable. The ground floor of 9-10 Mallow Street is set back from the east façade of 44 Featherstone Street by 4.5m with the visible façade of the building raising by 22m from ground floor level. Due to the roof top extension being set back from the east elevation by 3.25m, it is unlikely that the proposed roof top extension will have a perceptible effect on the occupants within the office floorspace and that there will be a negligible effect on VSC. Looking at the results for the second floor residential accommodation at 9-10 Mallow Street (set back by an additional 3m), R1/62 experiences existing VSC figures of between 5.5% and 6.5% with reductions of between 12.6% and 0.54%. R2/62 (to the south of R1/62) experiences VSC gains as the existing rooftop plant is being removed towards the front of 44 Featherstone Street that is higher than the extension proposed.

10.39 The infill extension to the rear of the building is stepped away from Mallow Street from fourth to sixth floor levels to address concerns that were initially raised. Therefore, this element of the development has been modified to address the potential sunlight/daylight effects on the premises along Mallow Street that adjoin the application site. Given the existing situation, the alterations that have been made to the massing and the updated results provided for surrounding units, it is concluded that the effect on VSC to both the ground and first floors units at 9-10 Mallow Street will be permissible under BRE guidance.

10.40 Sunlight: the BRE Guidelines confirm that windows that do not enjoy an orientation within 90 degrees of due south do not warrant assessment for sunlight losses. For those windows that do warrant assessment, it is considered that there would be a noticeable loss of sunlight where:

- *The centre of the window receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21st September and 21st March (winter) and*
- *Receives less than 0.8 times its former sunlight hours during either period and*
- *Has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours?*

10.41 The July 2019 report assesses windows at 11-12 Mallow Street, 9-10 Mallow Street, 8 Mallow Street, 48 Featherstone Street and 15-18 Featherstone Street. The report highlights that none of the windows tested fail the sunlight test outlined in paragraph 10.40. For a room to fail the BRE Guidance in terms of sunlight, it needs to fail on all three criteria. While some windows experience reductions in annual APSH which exceed 20%, the absolute reductions are less than 4% and therefore these reductions are compliant with BRE guidance.

Privacy/Overlooking/Overbearing

10.42 The development proposes front facing terrace areas to Featherstone Street at both fifth and sixth floor levels. The existing building already includes an accessible terrace (34.5sqm) at fifth floor level that fronts Featherstone Street (image at paragraph 3.2). The new terrace at sixth floor level (55.5sqm) will be set back by an additional 1.75m from the fifth floor terrace (38sqm) below. As there is already a front facing terrace in this location, the addition of a second terrace, set back and at a higher level, does not raise adverse concerns in terms of overlooking and effect on privacy to surrounding occupiers. Terraces to office developments such as the one proposed are not used at unsociable hours due to the nature of the office use. Condition 4 limits the hours of use of these terrace areas to ensure the amenities of surrounding occupiers are not adversely affected (0800-1800 Monday to Friday). The set-back area that faces Mallow Street is non-accessible and this will also be controlled via Condition 4.

10.43 There are currently various pieces of plant equipment on the roof space at 44 Featherstone Street. This application seeks to remove this plant, replacing it with an additional extension, set back 4.35m from the primary elevation to Featherstone Street. This alteration will have visual amenity benefits for those occupiers on the upper levels of neighbouring properties who have private views of the roofspace, mainly the upper levels of 15-18 Featherstone Street on the opposite side of the road to the application site, with an approximate separation distance of 12m. It is also considered that removing the plant and replacing it with a set-back single storey extension will have a negligible impact in terms of an overbearing affect and in this regard no adverse concerns are raised.

10.44 Overall, the development proposed is concluded to not result in unacceptable adverse effects on the amenities of surrounding occupiers in terms of noise, sunlight/daylight, privacy or having an overbearing effect. Sufficient amendments to the massing have been made and analysis provided that confirms there will be minor effects in terms of sunlight/daylight. Having regard to the specific characteristics of the affected properties the development is concluded to not have unacceptable negative effects on surrounding occupiers. Where necessary, conditions have been included to control any potential effects that have been identified to ensure no negative effects to neighbouring amenity will be realised such as controlling plant noise and hours of use of the terrace area. The development is therefore considered to comply with the relevant London Plan, Islington Core Strategy Finsbury Local Plan and Islington's Development Management Policies.

Transport and Highways

10.45 Development Management Policy DM8.2 requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner and to adequately address delivery, servicing and drop-off requirements.

10.46 The current building includes a loading area to the rear with associated parking, including a disabled parking bay. It is proposed to remove this loading area and vehicle parking and replace it with bicycle parking and refuse storage areas. It has been stated by the applicant that servicing is currently conducted on-street and that the loading area is no longer used for servicing purposes. Given that there will be an intensification of use as a result of the additional floorspace, a continuation of on-street servicing was not considered to be satisfactory, especially given that at this point on Featherstone Street there is a segregated one-way cycle lane on the same side of the road as the application site. To address this issue a Servicing Strategy document was provided that confirms a banksman will be available during office opening hours to guide larger servicing vehicles into the side access road so the loading and unloading of larger items, including refuse, can be conducted without blocking Featherstone Street and so the vehicle can make a safe reversal manoeuvre over the cycle lane. The document also includes swept path analysis to confirm this manoeuvre is possible (Image 10). Deliveries of smaller items can be safely conducted by parking on the other side of Featherstone Street where there is a single yellow line that allows short stay parking for loading purposes. The requirement of a banksman for servicing will be controlled via Condition 10. The servicing strategy outlined above is considered to be satisfactory and accords with the principles of Policy DM8.2.

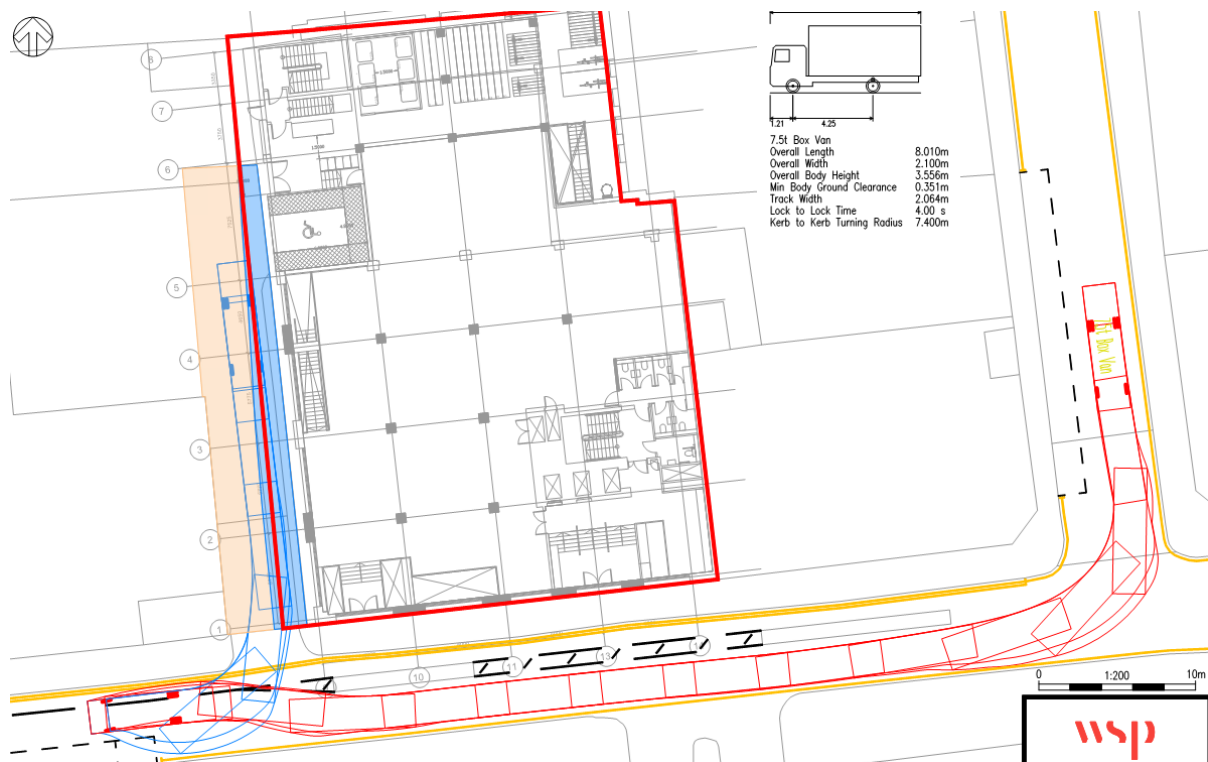


Image 20 – Swept Path Analysis for Larger Servicing Vehicles

10.47 Three objections were received that raised concerns over access to the adjoining rear courtyard to 48-50 Featherstone Street during the construction period. These concerns were raised to the applicant who provided a Logistics and Traffic Management Plan to address the objections. The document confirms that the construction scaffolding can be erected in such a way as to not obstruct access for private vehicles or for emergency service vehicles by having a 5m clear headroom.

- 10.48 The application has been submitted with a Waste Management Strategy that identifies the potential waste production of the development and the requisite collection requirements. An area to the rear of the ground floor has been allocated to refuse storage and the ground floor plan indicates that 6 x 1,100 litre Eurobins can be located in this area. Waste collection will occur via the side access road seen in Image 20. Overall the waste management strategy for the site is considered to be acceptable.
- 10.49 Policy DM8.4 requires bicycle parking to be provided in accordance with Table 6.1 (Appendix 6). A total of 68 standard size cycle parking spaces are shown on the ground floor plan (both 2-tier and 3-tier Josta systems) which is above the requirement of 1 per 80sqm of office floor space. In addition, four accessible cycle parking spaces are provided as well as 8 lockers for folding Brompton bikes. Cycle parking details are secured via Condition 14.
- 10.50 The disabled parking space that is currently located in the rear servicing area is being relocated to the side of the servicing and cycle access entrance (Condition 11). In addition, Policy DM8.4 requires end of trip facilities to be provided within developments over 100sqm, including extensions. The application includes showers and drying rooms in the proposed basement area and therefore this element of the policy is considered to be satisfied.
- 10.51 The travel plan submitted outlines the increased journey frequencies on existing transport modes as a result of the proposed development. While this document is not required for an application proposing less than 2500sqm of B1 floorspace, there are no adverse concerns raised over the details provided and the uplift in floor area will not lead to capacity issues for surrounding transport modes.
- 10.52 It is considered that the proposals have incorporated sufficient sustainable and accessible transport facilities to meet the transport needs of the building and is in compliance with the relevant transport policies of the Development Plan.

Accessibility

- 10.53 Comments received from the Inclusive design officer sought clarification over the accessible elements that have been incorporated into the design.
- 10.54 Level access is being provided into the building and a bespoke wheelchair lift will be installed to provide access to the raised ground floor level. An accessible WC is provided on each floor and there are three lifts provided, each capable of carrying a wheelchair user. As the building is over 24m in height, one of the lifts should be a firefighting lift capable of being used during a fire for the emergency services and the plans confirm that this has been incorporated into the design. Refuge areas for wheelchair users and those with mobility issues have also been provided on the upper levels. It was stated by the Inclusive Design Officer that one toilet cubicle per floor should be accessible to ambulant disabled persons. This requirement will be secured via condition 7.
- 10.55 Overall, it is considered that the design has incorporated sufficient inclusive design measures to meet the needs for wheelchair users and those with mobility difficulties. Provisions have been made in terms of accessible transport facilities in the basement and it is therefore concluded that the development is sufficiently inclusive and accords with the principles of Islington's Inclusive Design SPD (2014).

Energy Efficiency and Renewable Energy

- 10.56 Policy CS10 of Islington's Core Strategy seeks to minimise contributions to climate change and requires all development to demonstrate that it has minimised on-site carbon dioxide (CO₂) emissions by using less energy through maximising energy efficiency, supplying energy efficiently using low carbon heating and cooling systems, and using on-site renewable energy generation.

- 10.57 Policy DM7.1 requires proposals to integrate best practice sustainable design during the design, construction and operation of the development, as set out in the Environmental Design SPD. Policy DM7.2 relates to carbon reductions and energy efficient in minor schemes to achieve best practice energy efficiency standards, in terms of design and specification.
- 10.58 The development proposed creates below 1000sqm of additional office floorspace and is classed as a minor application. The applicant has provided an Energy and Sustainability Statement as well as a BREEAM report that address the policy requirements for a minor development such as the one proposed. The BREEAM assessment indicates that the development can achieve an 'Excellent' score which is the high standard usually applied to major developments and this requirement will be secured via condition 12.
- 10.59 The Energy and Sustainability Statement indicates that the development will achieve onsite cumulative CO2 savings of 33.13% using the Mayor's energy hierarchy (Be Lean, Be Clean and Be Green). As this is a minor application for an office extension and not a new build application, it is considered that the energy saving measures and the 'Excellent' BREEAM rating that the building will achieve sufficiently address that sustainability measures referenced in Policies CS10, DM7.1 and DM7.2.

Planning Obligations, Community Infrastructure Levy and local finance considerations

- 10.60 As the proposal creates additional office floorspace in the CAZ, the development is eligible to pay Mayoral and Borough CIL.
- 10.61 It was suggested by the inclusive design officer that additional accessible parking bays should be secured by way of a S106 agreement. If these spaces are not possible on site, then a contribution must be made towards accessible transport modes in the vicinity. The application is proposing a high volume of cycle parking, including tricycle parking and Brompton (folding bike) lockers, in the existing parking and servicing area. In addition, the one existing disabled parking bay is being retained (condition 11). Due to the location of the site, within the CAZ and in close proximity to various transport modes with a PTAL score of 6b (the best possible) and because the application is prioritising sustainable and inclusive transport modes on site, the requirement to make a contribution towards accessible parking is not necessary in this instance. A move away from car dependency is promoted by both the Mayor and within Islington's Development Management Policies (paragraph 8.19).
- 10.62 The applicant has indicated their agreement to enter into a S106 agreement that will require the applicant to make a financial contribution towards employment and training as well as construction training.

11. SUMMARY AND CONCLUSION

- 11.1 The provision of extended office accommodation is considered to be an appropriate land use intensification in the CAZ and an Employment Priority Area (General) and this is supported by the development plan. A S106 agreement will also be secured to provide employment and training (£11,055) as well as construction training (£5,000).
- 11.2 The overall design of the development has been assessed over its quality, effect on the neighbouring conservation area and Grade I listed heritage asset. It is concluded that the design is of a sufficiently high quality to be permissible and represents a significant improvement over the existing situation.
- 11.3 The assessment has concluded that there will be minimal harm to the Grade I designated heritage asset due to the visibility of the development from the Bunhill Fields Burial Ground. However, the public benefits of the proposals such as increased employment opportunities and visual amenity improvements outweigh the minimal harm that is being caused and therefore the development is in accordance with the NPPF and Policies DM2.3 and BC3.

- 11.4 Potential effects on neighbouring amenity are been deemed to be acceptable after amendments to the massing addressed initial concerns over sunlight and daylight implications for neighbouring occupiers. Conditions have been included that control the hours of use of the terrace area and the acceptable noise levels from the plant equipment, conditions 4 and 5 respectively.
- 11.5 An adequate servicing arrangement has been agreed and is secured by condition 10. and the building incorporates sufficient inclusive design measures.
- 11.6 In accordance with the above assessment, it is considered that the proposed development is consistent with the policies of the National Planning Policy, the London Plan, the Islington Core Strategy, the Finsbury Local Plan, Islington Development Management Policies and associated Supplementary Planning Documents and should be approved accordingly

Conclusion

- 11.7 It is recommended that planning permission be granted subject to conditions and the satisfactory completion of a S106 legal agreement.

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;

- a) A contribution of £11,055 towards employment and training opportunities.
- b) A contribution of £5,000 towards construction training.

RECOMMENDATION A

List of Conditions:

1	<p>Implementation Period</p> <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>
2	<p>Approved plans list</p> <p>CONDITION: The development hereby approved shall be carried out in accordance with the following approved plans:</p> <p><u>Existing and Demolition Plans</u></p> <p>006-TWA-XX-00-DR-AX-00 000, 006-TWA-XX-00-DR-AX-00 001, 006-TWA-XX-00-DR-AX-01 000, 006-TWA-XX-00-DR-AX-01 001, 006-TWA-XX-00-DR-AX-01 002, 006-TWA-XX-00-DR-AX-01 005, 006-TWA-XX-B1-DR-AX-01 099, 006-TWA-XX-00-DR-AX-01 007, 006-TWA-XX-XX-DR-AX-06 001, 006-TWA-XX-XX-DR-AX-06 002, 006-TWA-XX-XX-DR-AX-07 002, 006-TWA-XX-XX-DR-AX-07 003, 006-TWA-XX-00-DR-AX-07 001, 006-TWA-XX-00-DR-AX-07 002, 006-TWA-XX-B1-DR-AX-01 599, 006-TWA-XX-05-DR-AX-01 505, 006-TWA-XX-01-DR-AX-01 501, 006-TWA-XX-GF-DR-AX-01 500, 006-TWA-XX-RF-DR-AX-01 507, 006-TWA-XX-02-DR-AX-01 502.</p> <p><u>Proposed</u></p> <p>006-TWA-XX-00-DR-AX-00 010 P02, 006-TWA-XX-00-DR-AX-11 000, 006-TWA-XX-01-DR-AX-11 001, 006-TWA-XX-02-DR-AX-11 002, 006-TWA-XX-02-DR-AX-11 003 Rev P08, 006-TWA-XX-04-DR-AX-11 004 Rev P08, 006-TWA-XX-05-DR-AX-11 005 Rev P07, 006-TWA-XX-06-DR-AX-11 006 Rev P07, 006-TWA-XX-B1-DR-AX-11 099, 006-TWA-XX-RF-DR-AX-11 007 Rev P08, 006-TWA-XX-XX-DR-AX-16001 Rev T01, 006-TWA-XX-XX-DR-AX-16002 Rev P02, 006-TWA-XX-XX-DR-AX-17001 Rev P04, 006-TWA-XX-XX-DR-AX-17002 Rev P05, 006-TWA-XX-XX-DR-AX-17003 Rev P05, 006-TWA-XX-XX-DR-AX-17004 Rev P06,</p> <p>BREEAM Report Jan 2019, Design and Access Statement Jan 2019, Daylight and Sunlight Report dated 15th July 2019, Energy and Sustainability Report Jan 2019, Noise Impact Assessment Jan 2019, Planning Statement Jan 2019, Transport Statement Jan 2019, Waste Management Strategy Jan 2019, Construction Management Plan Rev 9, Logistics and Traffic Management Plan, Servicing Document Dated 10th April 2019, Area</p>

	<p>Schedule Existing 1902122, Area Schedule Proposed (006-TWA-XX-XX-SH-00008 Rev P02)</p> <p>REASON: To comply with Section 70(1) (a) of the Town and Country Act 1990 as amended and the Reason for Grant and also for the avoidance of doubt and in the interest of proper planning.</p>
3	<p>MATERIALS (DETAILS):</p> <p>CONDITION: Details and samples of all facing materials shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure work commencing on site. The details and samples shall include:</p> <ul style="list-style-type: none"> a) render (including colour, texture and method of application); b) window treatment (including sections and reveals); c) roofing materials; d) balustrading treatment (including sections); e) Any other materials to be used. <p>The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.</p> <p>REASON: In the interest of securing sustainable development and to ensure that the resulting appearance and construction of the development is of a high standard.</p>
4	<p>Hours of Use (Roof Terraces)</p> <p>CONDITION: The terraces areas facing Featherstone Street hereby approved shall not operate outside the hours of:</p> <p>0800 to 1800 hours Monday to Friday only.</p> <p>The rear external area at sixth floor level, as shown on plan no. 006-TWA-XX-06-DR-AX-11 006 Rev P07 hereby approved, shall not be used as an amenity or sitting out space of any kind whatsoever and shall not be used other than for essential maintenance or repair, or escape in case of emergency.</p> <p>Reason: To protect the amenities of neighbouring residents and surrounding occupiers.</p>
5	<p>Plant Noise</p> <p>CONDITION: The design and installation of new items of fixed plant shall be such that when operating the cumulative noise level $L_{Aeq, Tr}$ arising from the proposed plant, measured or predicted at 1m from the facade of the nearest noise sensitive premises, shall be a rating level of at least 5dB(A) below the background noise level $L_{AF90, Tbg}$. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142: 2014.</p> <p>Reason: To protect the amenities of neighbouring residents and surrounding occupiers.</p>
6	<p>Construction Environmental Management Plan</p> <p>CONDITION: The construction of the development hereby approved shall be carried out in accordance with approved document 'Construction Management Plan Revision 9'</p> <p>The development shall be carried out strictly in accordance with the details contained within the CMP and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>Reason: To protect the amenities of neighbouring residents, surrounding occupiers and members of the public during construction.</p>

7	<p>Inclusive Design Measures</p> <p>CONDITION: Notwithstanding the plans hereby approved, one toilet cubicle per floor should be accessible to ambulant disabled persons with doors that open outwards, a larger cubicle space and grab rails. All wheelchair accessible WC's should have a clear opening width of 800mm. The cycle parking/servicing door on the west elevation should be a powered door if heavier than 30N to open.</p> <p>Reason: To ensure the development is adequately inclusive for those with mobility difficulties and to comply with Islington's Inclusive Design SPD (2014).</p>
8	<p>Plant Details (First Floor)</p> <p>CONDITION: Details of the acoustic louvers around the first floor plant area, as shown on drawings 006-TWA-XX-01-DR-AX-11 001 and 006-TWA-XX-XX-DR-AX-17004 Rev P06 hereby approved, shall be submitted to and approved in writing by the Local Planning Authority prior to their installation. The details shall confirm how the cumulative noise impacts from plant will be reduced, in accordance with the requirements of condition 4.</p> <p>Reason: To protect the amenities of neighbouring residents and surrounding occupiers.</p>
9	<p>Plant Details (Seventh Floor Level)</p> <p>CONDITION: Full details of the proposed roof top plant area, labelled as 'Future Tenant Plant' on approved drawing 006-TWA-XX-RF-DR-AX-11 007 Rev P08, shall be submitted to and approved in writing by the Local Planning Authority prior to their installation. The details shall confirm the design and appearance of the plant area and how the cumulative noise impacts from plant will be reduced, in accordance with the requirements of condition 4.</p> <p>Reason: To protect the amenities of neighbouring residents and surrounding occupiers.</p>
10	<p>Delivery and Servicing</p> <p>CONDITION: The delivery and servicing shall be conducted in accordance with approved document 'Servicing Document Dated 10th April 2019' and a banksman shall be available during normal office hours for the delivery and collection of larger items, including for refuse collection purposes. The delivery and collection of larger items is not permitted outside normal office hours or when a banksman is not onsite. Vehicles larger than a long wheelbase panel van are not permitted to conduct servicing and delivery operations from Featherstone Street and are required to use the servicing procedure outlined in the 'Servicing Document Dated 10th April 2019'</p> <p>Reason; In order to protect the continued safe operation of the highway.</p>
11	<p>Reprovision of Wheelchair Parking Space</p> <p>CONDITION: The wheelchair parking space, as shown on drawing 006-TWA-XX-00-DR-AX-11 000, shall be used only by eligible blue badge holders and maintained as a disabled parking space in perpetuity.</p> <p>Reason: To ensure the development is adequately inclusive for those with mobility difficulties and to comply with Islington's Inclusive Design SPD (2014).</p>
12	<p>BREEAM (COMPLIANCE)</p> <p>CONDITION: The development shall achieve a BREEAM (2014 Non-domestic Refurbishment and Fit-out) rating of no less than 'Excellent' in accordance with the submitted BREEAM Report dated January 2019.</p> <p>REASON: In the interest of addressing climate change and to secure sustainable development</p>

13	Green/Brown Biodiversity Roof Feasibility Study
	<p>A) Prior to the superstructure work commencing on site, a feasibility study shall be submitted to and approved in writing by the Local Planning Authority assessing the structural capability of the building to incorporate an 80mm (minimum) deep Green or Brown Biodiverse Roof.</p> <p>B) Should the feasibility report conclude that a Green/Brown Roof is structurally feasible, the following additional details should be provided against condition 13:</p> <p>Confirmation that the Green/Brown Roof will be:</p> <p>a) biodiversity based with extensive substrate base (depth 80-150mm); b) laid out in accordance with plan 1666/43B hereby approved; and c) planted/seeded with a mix of species within the first planting season following the practical completion of the building works (the seed mix shall be focused on wildflower planting, and shall contain no more than a maximum of 25% sedum.</p> <p>The biodiversity (green/brown) roof 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. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.</p> <p>REASON: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity.</p>
14	Cycle Parking
	<p>CONDITION: The cycle parking hereby approved must be constructed in accordance with approved plan 006-TWA-XX-00-DR-AX-11 000 and provide no fewer than 80 spaces and be maintained as such thereafter.</p> <p>REASON: To ensure adequate cycle parking is available and easily accessible on site and to promote sustainable modes of transport.</p>
15	Building Management Plan
	<p>CONDITION: Details of measures to adequately mitigate light pollution affecting neighbouring residential properties shall be submitted to, approved in writing by the Local Planning Authority and implemented prior to first occupation of the new floorspace hereby permitted. These measures might include:</p> <ul style="list-style-type: none"> • Automated roller blinds; • Lighting strategies that reduce the output of luminaires closer to the façades; • Light fittings controlled through the use of sensors. <p>The approved mitigation measures shall be implemented strictly in accordance with the approved details and shall be permanently maintained thereafter.</p> <p>REASON: In the interests of the residential amenities of the occupants of adjacent residential dwellings.</p>

List of Informative:

1	Car-Free Development
	<p>Car-Free Development. All new developments are car free in accordance with Policy CS10 of the Islington Core Strategy 2011. This means that no parking provision will be allowed on site and occupiers will have no ability to obtain car parking permits, except for parking needed to meet the needs of disabled people.</p>

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 2019 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.

2. Development Plan

The Development Plan is comprised of the London Plan 2011, 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 2011 - Spatial Development Strategy for Greater London

4 London's economy

- Policy 4.2 Offices
- Policy 4.3 Mixed use development and offices

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

6 London's transport

- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.9 Cycling
- Policy 6.13 Parking

7 London's living places and spaces

- Policy 7.2 An inclusive environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.6 Architecture
- Policy 7.14 Improving air quality
- Policy 7.15 Reducing noise and enhancing soundscapes

8 Implementation, monitoring and review

- 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)

- Policy CS13 (Employment Spaces)

Strategic Policies

- Policy CS9 (Protecting and Enhancing Islington's Built and Historic Environment)
- Policy CS10 (Sustainable Design)
- Policy CS11 (Waste)

Infrastructure and Implementation

- Policy CS18 (Delivery and Infrastructure)

C) Development Management Policies June 2013

Design and Heritage

- DM2.1 Design
- DM2.2 Inclusive Design
- DM2.3 Heritage

Transport

- DM8.1 Movement hierarchy
- DM8.2 Managing transport impacts
- DM8.4 Walking and cycling

DM8.5 Vehicle parking

Employment

- DM5.1 New business floorspace
- DM5.2 Loss of existing business floorspace

Infrastructure

DM9.2 Planning obligations

Energy and Environmental Standards

- DM7.1 Sustainable design and construction statements
- DM7.2 Energy efficiency and carbon reduction in minor schemes
- DM7.4 Sustainable design standards

D) Finsbury Local Plan June 2013

BC3 Old Street

BC8 Achieving a balanced mix of uses

E) Site Allocations June 2013

Not Allocated

3. Designations

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

- Core Strategy Key Area – Bunhill and Clerkenwell;
- Employment Priority Areas (General);
- Central Activities Zone;
- Archaeological Priority Area - Moorfields;
- Finsbury Local Plan Area – Old Street;
- Article 4 Direction A1-A2;
- Article 4 Direction B1(c)-C3

6. Supplementary Planning Guidance (SPG) / Document (SPD)

The following SPGs and/or SPDs are relevant:

Islington Local Development Plan

- Environmental Design
- Urban Design Guide
- Inclusive Design (2014)
- Planning Obligations

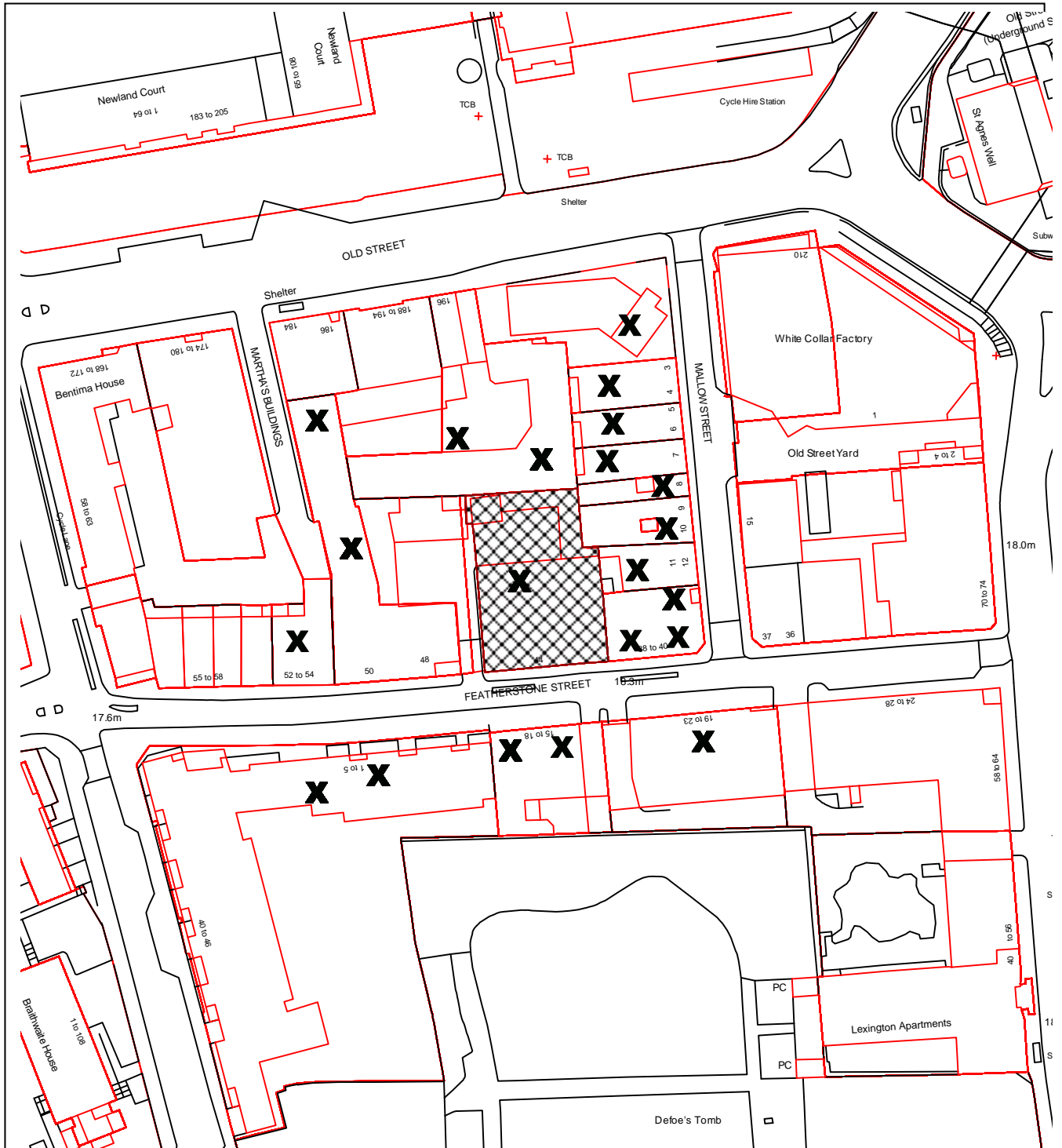
London Plan

- Accessible London: Achieving and Inclusive Environment
- Housing
- Sustainable Design & Construction
- Planning for Equality and Diversity in London

- BRE Guidance – Site Layout Planning for Daylight and Sunlight, A guide to good practice (Second Edition)

This page is intentionally left blank

ISLINGTON



This material has been reproduced from Ordnance Survey digital map data with the permission of the controller of Her Majesty's Stationery Office, © Crown Copyright.
P2019/0183/FUL

This page is intentionally left blank