

# **Planning Brief for Clerkenwell Fire Station**

October 2014

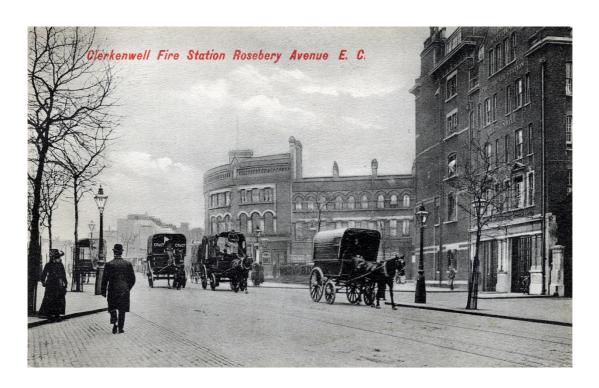


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# Clerkenwell Firemen (circa 1900)



Clerkenwell Fire Station (circa 1904)



## 1. Introduction

1.0.1 Clerkenwell Fire Station was one of the first purpose-built fire stations in London and is of significant historical interest. It remained in operation from 1873 until 2014. Following a legal direction by the Mayor of London, the London Fire and Emergency Planning Authority (LFEPA) took the decision to close the Station along with 9 other London fire stations in September 2013. The Station was closed in January 2014. LFEPA are now marketing the site for sale. This planning brief is intended to explain how any future development proposal for the site can meet the Council's planning policies.

# 1.1 Purpose

- 1.1.1 The brief sets out the relevant planning policies and standards that should be addressed by any future development proposal for the Clerkenwell Fire Station site. It also sets out some of the key planning and design issues and information that an applicant should include in any future application.
- 1.1.2 The planning brief will provide planning guidance for development management purposes. This brief will be taken as a material consideration in the determination of any planning applications for the future development of the site. However, national and local planning policy may change and any applications will be determined in light of the adopted planning policies at the time a decision on the application is made.

# 1.2 Background

- 1.2.1 Clerkenwell Fire Station was originally built by the Metropolitan Board of Works between 1871-73. The Station was one of a number of fire stations built in Victorian London to accommodate the newly created Metropolitan Fire Brigade. The Fire Brigade was formed in 1866 following the Metropolitan Fire Brigade Act (1865). The Act gave the Metropolitan Board of Works the powers to establish a professional fire brigade to protect life and property from fire throughout London. In 1889, the newly created London County Council (LCC) took control of the Fire Brigade along with the Board of Works' other functions.
- 1.2.2 By 1890 the Station had become the Superintendent's Station and therefore one of the most important stations in Central London. The Station was considered too small to accommodate the operational space required and the growing number of people working from the Station. The LCC extended the Station to the south-west in 1895-97. The improvements created a larger appliance room with an access onto the newly created Rosebery Avenue. This arrangement was considered safer than exiting onto the busier and narrower Farringdon Road. The works also created new accommodation above the Station for the people working from the Station.
- 1.2.3 However, within a few years, the Station soon became insufficient for the Brigade's continued growth. The LCC drew up plans to expand the Station further to the south-west and rebuild the original 1873 part of the Station. The works to deliver these plans took place between 1912-17. These works are credited with creating the building's distinctive front elevation that faces Rosebery Avenue and comprises a unified symmetrical façade made of red brick and Portland stone.
- 1.2.4 A number of alterations have occurred since the 1917 extension to accommodate the Fire Brigade's changing operational requirements. This includes the appliance room's timber doors, the modern drill tower in the yard and basement car park beneath the yard.

1.2.5 Clerkenwell Fire Station was closed in January 2014. The closure of the Station was part of a wider plan by the Mayor of London for the Fire Brigade to make substantial savings worth £29 million during 2014-16. As members of LFEPA initially voted against the Mayor's proposed savings on 18 July 2013, the Mayor of London issued a legal direction that compelled members of LFEPA to approve the proposed savings¹ at its meeting on 12 September 2013. The savings include closing ten fire stations, fewer fire engines and staff reductions. The site is now being marketed for sale by LFEPA.

#### **Objectives for Clerkenwell Fire Station**

- **1.2.6** The Council's objectives for any future development proposals for Clerkenwell Fire Station include to:
  - ensure that Clerkenwell Fire Station continues to be an important community asset that is publicly accessible to the local community;
  - refurbish the Grade II listed Fire Station building in a way that meets the Council's policies and standards and also modernises it for a range of different uses;
  - provide a museum in the Fire Station building or another publicly accessible social infrastructure use:
  - deliver a range of new homes, including affordable homes, to better meet local housing needs in the neighbourhood;
  - provide high quality amenity space, primarily for future residents, in the Fire Station's yard;
     and
  - ensure that any new buildings achieve a high standard of architectural design that improves the character and quality of the area.

#### **An Asset of Community Value**

- 1.2.7 Following an application from a local community group for the Clerkenwell Fire Station to be listed as an Asset of Community Value, the Council decided on 22 May 2014 to list the Fire Station as an Asset of Community Value. The listing applies to the whole site.
- 1.2.8 LFEPA wrote to the Council on 28 May 2014 formally stating their wish to sell the property. In line with the legislation affecting assets of community value, this notification triggered an initial six week moratorium preventing the sale of the property. On 1 July 2014 a community interest group wrote to the Council stating its intention to bid for the Fire Station. The notification from the community interest group has triggered a six month moratorium period, which prevents the sale of the property during this period. The period runs from 28 May 2014 to 26 November 2014.
- 1.2.9 No commercial sale of the property on the open market can be concluded until after 26 November 2014. However, LFEPA are permitted to sell the property to a community organisation during the period if the organisation can demonstrate they have sufficient funds to purchase the property. LFEPA are under no obligation to sell the property to any organisation.

<sup>&</sup>lt;sup>1</sup> Details of the savings are set out within the Fifth London Fire Safety Plan (September 2013). A copy of the plan can be accessed here - <a href="http://www.london-fire.gov.uk/lsp5.asp">http://www.london-fire.gov.uk/lsp5.asp</a>

#### 1.3 Public Consultation

- 1.3.1 A public consultation on the draft planning brief was held between 1 August 2014 to 14 September 2014. People were able to respond to the planning brief in a number of ways:
  - Send a text message with their views to 07825 098 960
  - Email their comments to <u>clerkenwellfirestation@islington.gov.uk</u>
  - Visit Islington Council and provide comments: <a href="https://www.islington.gov.uk/clerkenewellfirestation">www.islington.gov.uk/clerkenewellfirestation</a>
  - Request a consultation leaflet by email or by phone, and fill in the question and comment boxes at the back of the leaflet and then post it back to Islington Council by free post
- 1.3.2 Islington Council also held three drop-in events at the Holy Redeemer Church (24 Exmouth Market, London, EC1R 4QE) on the following dates:

16 August 2014 21 August 2014 4 September 2014 11.00am – 2.00pm 11.00am – 2.00pm 5.00pm – 8.00pm

- 1.3.3 The planning brief was also discussed at the Finsbury Ward Partnership on 10 September. The comments raised during the ward partnership meeting have been considered along with other comments received.
- 1.3.4 Prior to adoption, the consultation results will be published on the Council's website and can be found at <a href="www.lslington.gov.uk/ClerkenwellFireStation">www.lslington.gov.uk/ClerkenwellFireStation</a>. The Council's Executive will make the decision to adopt the final version of the planning brief on 23 October 2014.

#### 1.4 Council's role

- 1.4.1 Islington Council is the Statutory Planning Authority with responsibility for determining all planning applications made for this site, independently of all its other functions. The Council will take all material planning considerations into account when determining a future planning application for the site, including comments made by members of the public during consultation on any planning application.
- 1.4.2 The planning brief therefore seeks to give the local community, future developers and other interested parties guidance over the land uses, design and impact of any future development proposal that may be acceptable to the Council.

# 2. Planning context

- 2.1.1 The planning policy context comprises a series of planning policy documents from national to local level. More detail on the key planning policies is provided in Appendix 2 and key planning considerations are summarised in Section 4.2.
- 2.1.2 The Council makes planning decisions in the borough based on national, regional (London) and its own local planning policy. At a national level, the Government produces planning guidance that sets out a general framework for planning at the regional and local level. The National Planning Policy Framework was published in March 2012 and the National Planning Practice Guidance published in March 2014.
- 2.1.3 All planning decisions are guided by the Development Plan. In Islington this consists of the London Plan (a development strategy for Greater London produced by the Mayor of London) and Islington's local policies.
- 2.1.4 Islington's local policies are set out in several planning documents that together make up Islington's Local Plan (as shown in Figure 1 below). Islington's policies are required to be consistent with both national policy and the London Plan. The key document in the Local Plan is the Core Strategy. It sets out the strategic vision for what the Council wants to achieve in the future, where and how change will happen. Islington Council's Core Strategy was adopted in February 2011.

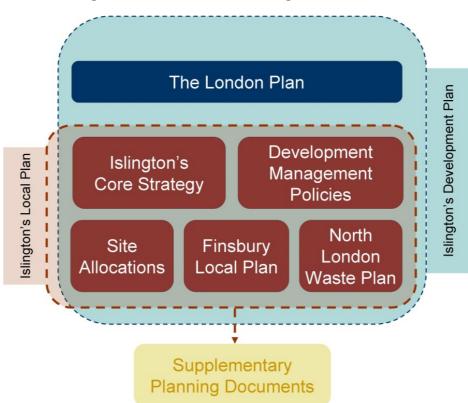


Figure 1 - Documents in the Islington's Local Plan

2.1.5 The planning brief also takes into account, and is consistent with policies contained within the Development Management Policies and the Finsbury Local Plan (both adopted June 2013).

- 2.1.6 The use of the building as a fire station is classified as social infrastructure. Development Management Policy DM 4.12 provides detailed policy guidance on such uses. Part A of the policy states that the Council will not permit any loss or reduction in social infrastructure uses unless a replacement facility is provided or the specific use is no longer required on site. Where a specific use is no longer required on site, the applicant must provide evidence demonstrating:
  - that the proposal would not lead to a shortfall in provision for the specific use within the local catchment area;
  - that there is either no demand for another suitable social infrastructure use on site (through marketing evidence), or that the site is no longer appropriate for social infrastructure uses; and
  - any replacement/relocated facilities for the specific use provide a level of accessibility and standard of provision at least equal to that of the existing facility.
- 2.1.7 The Finsbury Local Plan sets out a vision for the south of Islington for a 15 year period. This site is within the North Clerkenwell area. Policy BC 6 sets out the policy requirements for important development proposals that may come forward in this area. The policy requires new development to deliver a range of benefits including:
  - conservation and enhancement of heritage assets associated with the Rosebery Avenue Conservation Area:
  - refurbished and new buildings of high architectural design and local distinctiveness;
  - a range of types and sizes of new homes including family sized homes;
  - public realm improvements that facilitate walking and cycling and promote pedestrian activity; and
  - safeguarding of Clerkenwell Fire Station and other key community assets.
- **2.1.8** Finsbury Local Plan Site Allocation BC 44 provides specific policy requirements for any future development proposal for Clerkenwell Fire Station site. The justification is quoted below:

Refurbishment of existing Fire Station building for operational and potentially residential use, and sensitive infill development to the rear of the site comprising residential development and, potentially, active ground floor frontages.

The building contributes positively to the character of the Conservation Area. Sensitive infill development of a similar scale and massing to the Fire Station and neighbouring buildings offers an opportunity to improve the block interface with surrounding streets and enhance the character of the area in line with the Conservation Area Design Guidelines.

**2.1.9** The Site Allocation also includes the following design considerations and constraints:

The building is one of London's surviving original fire stations. A Grade II listed structure, it lies within the Rosebery Avenue Conservation Area and adjacent to the Grade II listed 40 Rosebery Avenue. Development proposals must conserve and enhance these heritage assets and retain operational activities on site.

The conversion of parts of the Fire Station building to residential use may be appropriate where the architectural and operational integrity of the listed building can be retained and where an adequate standard of amenity for occupants can be demonstrated. Advice on the management and adaptation of buildings of this type is provided in joint guidance issued by English Heritage and the London Fire Brigade in 2010 (London's Historic Fire Stations).

Infill development should protect the amenity of existing residents, demonstrate an understanding of the local and historic context and respond positively to heritage assets and their significance.

The site falls within protected viewing corridors defined by the London View Management Framework.

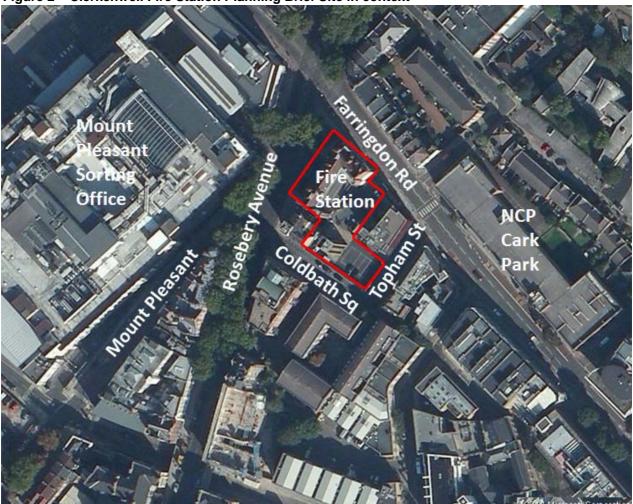
- 2.1.10 The building was Grade II listed in 1988 by English Heritage. The listing status protects both the exterior and interior of the building, the yard and boundary walls which all fall within its curtilage. English Heritage stated the following reasons for the listing:
  - It ranks among some of the best examples of a remarkable group of fire stations built by the LCC between 1900-1914, which are widely admired as being the among the most accomplished civic buildings produced by the renowned LCC Architects' Division in this rich and prolific period;
  - It exhibits the quality of materials and attention to detail which are the hallmarks of LCC design, and is virtually intact externally; and
  - The elevations and massing are well-composed, responding well to the prominent corner site.
- 2.1.11 The building falls within the Rosebery Avenue Conservation Area (CA 34), but the rear of the site does not. The rear of the site is located adjacent to the Clerkenwell Green Conservation Area (CA 01). Any proposed development at the rear of the site must consider both the Rosebery Avenue Conservation Area Design Guidelines and the Clerkenwell Green Conservation Area Design Guidelines.

# 3. Site description

### 3.1 Site location and context

3.1.1 Clerkenwell Fire Station is located in Clerkenwell ward. It is bordered by Farringdon Road to the north, Topham Street to the east, Coldbath Square to the south and Rosebery Avenue to the west. Major redevelopment sites within the site's vicinity include the Mount Pleasant Sorting Office and the NCP Car Park. The historic Exmouth Market lies to the north of the site. Figure 2 below shows the location of the site in relation to the surrounding street network and major development sites.

Figure 2 - Clerkenwell Fire Station Planning Brief Site in context



- 3.1.2 The site has the highest possible Public Transport Accessibility Level rating 6b<sup>2</sup>. The nearest underground stations are Farringdon and Angel. Farringdon Station is served by a number of underground lines, national rail services and from 2018 Crossrail services will run from this station. Angel Underground Station is served by the Northern Line. The site is also served by a number of bus routes including 19, 38 and 341 that run along Rosebery Avenue. There is a large forecourt in front of the Fire Station on Rosebery Avenue that enabled fire engines to exit the Station. The forecourt forms part of the public highway. It is not part of the Fire Station site and is owned by the Council as the highway authority.
- 3.1.3 The photos overleaf illustrate the building types surrounding the planning brief site.

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<sup>&</sup>lt;sup>2</sup> TfL Planning Information Database

# Site context photos – neighbouring buildings

# Rosebery Court, Coldbath Square



The Gazzano building, 167-169 Farringdon Rd





The Quality Chop House, 92-94 Farringdon Rd



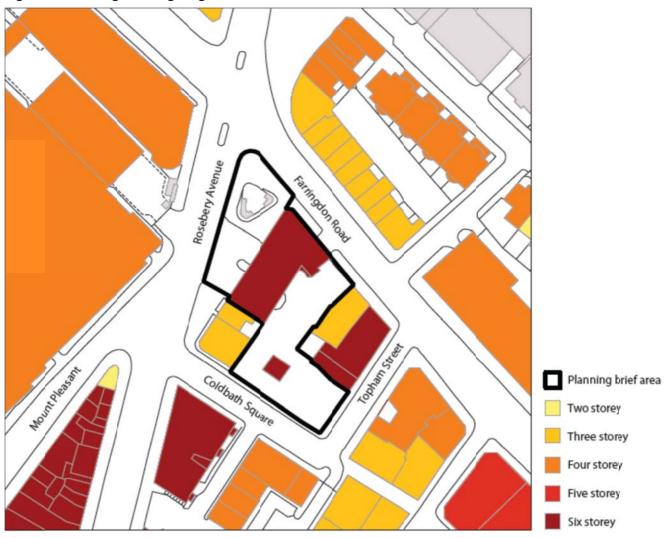
### 3.2 Land use

3.2.1 The Fire Station is a specific land use that is protected (sui generis). Any change of use of any part of the building or the surrounding site from its use as a fire station will require planning permission. The four floors of residential accommodation are ancillary to the building's use as a fire station. Use of these floors as residential accommodation will require planning permission. Further detail on land use is provided in Section 4.

# 3.3 Building Heights

3.3.1 The Clerkenwell Fire Station building is six storeys in height. Neighbouring buildings along Farringdon Road are generally three to four storeys in height. Buildings along Topham Street and Coldbath Square vary in height from three to six storeys. Buildings are generally higher along Rosebery Avenue with a number of six storey buildings in close proximity to the site, such as Rosebery Court (36A Rosebery Avenue). Figure 3 below shows the approximate building heights for neighbouring buildings in the area:

Figure 3 - Existing building heights



### 3.4 Site characteristics

3.4.1 The planning brief site is divided into the Fire Station building, the Fire Station's yard and the Fire Station forecourt area. Following consultation, the forecourt area has been included in the planning brief. The forecourt area includes the vehicle forecourt, footways, the underground former public toilets and a mature tree. The buildings adjacent to the planning brief area are not included within the brief. Figure 4 below provides a site plan.



#### Front and rear elevations of the Fire Station building

3.4.2 The front elevation of the Clerkenwell Fire Station building faces Rosebery Avenue. It is a unified symmetrical façade made up of three component structures. It is the result of the 1912-17 rebuilding of the Fire Station. The front elevation is red brick (laid in an English bond) with Portland stone dressing at the ground floor level. This elevation is an example of the 'restrained arts and crafts style' of this period, in particular the stone detailing at ground, attic and roof storey levels. The large forecourt area in front of the building on Rosebery Avenue frames the building's impressive front elevation (see 3.4.8 for further information about the forecourt area). The rear elevation is yellow stock brick with iron railed landings on each floor. The roof is steeply pitched and made up of clay tiles. The site photos below illustrate some of the key features of the building's front and rear elevations:

#### Site photos - Front elevation





Stone detailing at ground floor level



Stone detailing at attic and roof levels



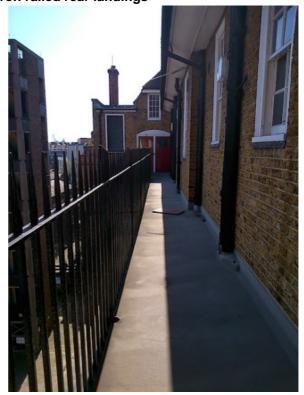
Rear elevation



The original drill tower



Iron railed rear landings



### The Fire Station building

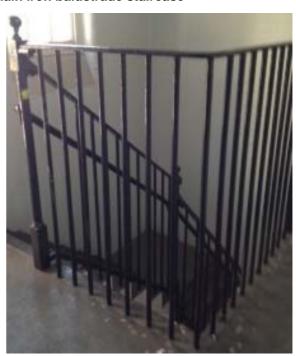
- 3.4.3 There are some important historic and architectural features within the Fire Station building including:
  - The appliance room: located on the ground floor, the appliance room served as the garage or engine room for the fire engines. There are four appliance bays within the room that can accommodate a fire engine. The open-plan arrangement, the traditional front and back doors, the visible steel girders, the utilitarian non-slip flooring materials and painted brickwork of the walls are distinctive features of the room.
  - The watch-room: also located on ground floor level, the purpose of the watch room was to receive all incoming alarms. The access between the watch room and appliance room is important as it helps to explain the operation of the building as a fire station.
  - The officer's mess: the officer's mess is located on the first floor. The purpose of the mess was to provide a space for fireman to eat and socialise. The mess room still contains the original dado timber panelling that is a distinctive feature of historic fire station mess rooms.
  - Residential accommodation: there are four floors of ancillary residential accommodation above the Fire Station. A number of original features remain such as the fireplaces, alcovecupboards, skirting boards, cornices (window ledges) and doors. In addition, the communal washroom, with the original washing and drying equipment, remains intact on the 6<sup>th</sup> floor. Since the flats were built, the layout of the flats has been significantly altered from their original plan-form.
  - Circulation space: the building accommodates the original internal drill tower, three poles, the main internal stair and the landings on the rear of the building.
- 3.4.4 The site photos overleaf illustrate some of the key features of the Fire Station building:

#### Site photos – Fire Station building

#### The appliance room



#### Main iron balustrade staircase



# Site photos – Fire Station building's residential accommodation







Site photos – Fire Station building's communal washroom





#### The Fire Station yard

- 3.4.5 The remainder of the site is made up of the Fire Station's yard. The Station's yard is an open space at the rear of the building. It is at ground level from the access on Farringdon Road and at raised ground level on Topham Street and Coldbath Square. This is due to the level differences across the site. The yard's primary purpose was to allow fire engines to enter from Farringdon Road into the appliance room. The yard's most distinctive feature is its open plan nature. The yard also includes a number of features:
  - Modern drill tower: an eight storey drill tower occupies part of the yard in the southern corner. This is of limited architectural and historical significance.
  - Stores: there are stores within the yard that were used to store fuel and other supplies for the fire engines.
  - Parking space: a modern basement car park is located below the yard. In addition some of the space within the yard has been used as parking spaces.
  - Boundary walls: boundary walls run along the site's southern and eastern boundaries on Coldbath Square and Topham Street. Due to the presence of these walls, the street frontage along this part of the site is inactive and blank.
- **3.4.6** The site photos below demonstrate some of the key features of the Station's yard:

#### Site photos - The Fire Station yard





#### **Fire Station site entrances**

3.4.7 The site has five entrances. There are three entrances on Farringdon Road, including a pedestrian entrance directly into the building, the original vehicular exit out of the building and a vehicular entrance into the yard. The main vehicular exit out of the building is on Rosebery Avenue. There is also an entrance from Topham Street that leads directly into the basement car park. The site photos below and overleaf show the site's five access points:

### Site photos - Site entrances

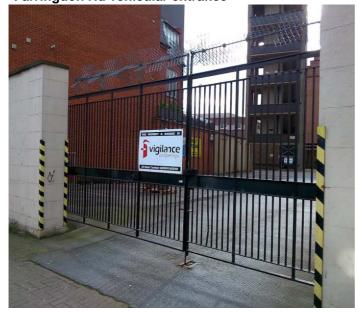
### Farringdon Rd pedestrian entrance



Original vehicular exit



Farringdon Rd vehicular entrance



# Site photos – Other entrances

Rosebery Avenue exit



**Topham St entrance** 



#### **Fire Station Forecourt area**

3.4.8 There is a large forecourt in the front of the Fire Station building on Rosebery Avenue. The forecourt area enabled fire engines to easily enter and exit the Station. There are also underground former public toilets located outside the Fire Station building on Rosebery Avenue and adjacent to the vehicle forecourt. A podium has been created on the footway above the toilets. The podium accommodates the entrances to the toilets and a vent structure. The entrances to the toilets also include attractive cast-iron railings, which are expected to be retained as part of any future refurbishment works. The photos below demonstrate the forecourt area's key features:

## Forecourt area photos



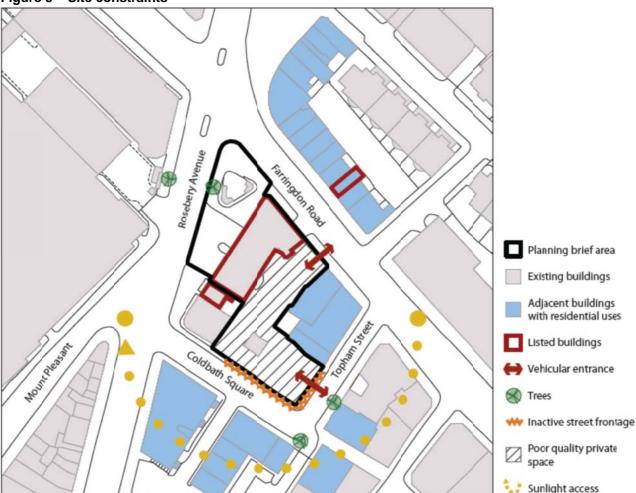
Underground former public toilets, Rosebery Avenue



#### 3.5 Site constraints

3.5.1 There are a number of constraints relating to the site. This section sets out these constraints in more detail. Some of these constraints are illustrated in Figure 5 below.

Figure 5 - Site constraints



### **Clerkenwell Fire Station**

3.5.2 The front and rear elevations remain virtually intact from the 1917 extension. The Council strongly discourages any alterations to the front and rear elevations. Development proposals for internal alterations should conserve the architectural integrity of the Fire Station. Wherever possible, proposals should maintain or return parts of the building to it's original plan form and function. For example, there is scope to refurbish the upper floors for contemporary residential use. Proposals should retain the Station's original features. Features, such as the original drill tower, help explain the building's original function as a fire station. Original materials should be retained and new materials must positively respond to the original materials. Paragraphs 4.2.2 to 4.2.9 provide more detail on which elements the Council expects to see conserved as part of any refurbishment proposal.

#### The Fire Station yard

3.5.3 The Station's yard forms an important component of the site. It supports the site's function and purpose as a fire station. It is, however, a poor quality private space that is currently inaccessible to the local community. Any future development proposal must raise the quality and explore ways to improve the accessibility of this space to the general public.

- 3.5.4 Any future development proposal for infill development within the Station's yard should demonstrate an understanding of the local and historical context and respond positively to heritage assets and their significance. In order to protect the Fire Station building's setting, the height of any new buildings must be must be lower than the Station building. Development along the Farringdon Road vehicular entrance will not be considered acceptable, because the vehicular entrance helps protect the setting of the Station's rear elevation and provides vehicular access for servicing and deliveries at the site.
- 3.5.5 The boundary walls around the yard's southern and eastern edges currently provide inactive and monotonous frontage. This is not in keeping with the perimeter block character of North Clerkenwell; where most building tend to face the street and have their main entrances directly onto the street. In line with Finsbury Local Plan Policy BC 6, any future development proposals should improve the quality of street frontages along these edges. This will ensure new development is more in keeping with the character of the area.

#### **Conservation Areas**

3.5.6 The Fire Station building lies within the Rosebery Avenue Conservation Area (CA 34). The south-east corner of the Station's yard sits adjacent to the Clerkenwell Green Conservation Area (CA 01). To be in keeping with the character of both conservation areas, any future development proposals should have regard to the Guidelines for both conservation areas. Wherever possible any future development proposal should also seek to enhance views out of the rear of the building into the Fleet Valley and improve views towards the rear of the building from the south and south-east, including the Clerkenwell Green Conservation Area, towards the rear of the building.

#### **Residential amenity**

3.5.7 Infill development within the yard should protect the amenity of the residents of neighbouring properties including consideration of outlook, privacy, direct sunlight and daylight. Furthermore, if any parts of the Station's building are converted to residential use, it must be demonstrated that a high standard of amenity can be achieved for future residents, as such residents could be exposed to high levels of noise and air pollution along Rosebery Avenue and Farringdon Road.

#### **Protected views**

3.5.8 The site falls within the Kenwood to St Paul's' vista. This forms part of the protected viewing corridors defined by the London View Management Framework Supplementary Planning Guidance (SPG).

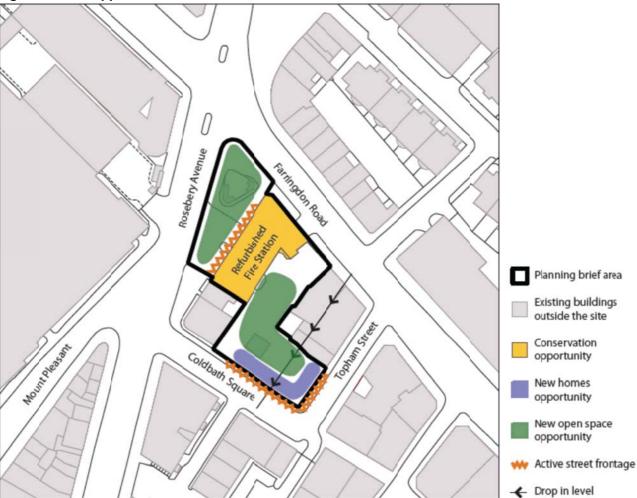
#### Social infrastructure

- 3.5.9 The Fire Station is classed as social infrastructure for planning purposes. The Council will not permit any loss or reduction in social infrastructure uses unless a replacement facility is provided or the specific use is no longer required on site. In the latter case robust evidence must be provided to demonstrate that any future development proposal would not lead to a shortfall in provision, any replacement provides an equal level of accessibility and standard of provision, and that there is no demand for another suitable social infrastructure use on site.
- 3.5.10 Given the architectural and historic interest of the Appliance Room, Watch Room, Mess Room and other parts of the building, a Fire Brigade museum is the Council's preferred use. A new museum would attract visitors who were also visiting the new British Postal Museum and Archive and reopened Mail Rail (due to open in 2016). If a new museum is not feasible, other publicly accessible social infrastructure uses would be appropriate, such as a public arts centre or a community centre.

# **3.6** Site Opportunities

3.6.1 This section explains the site's opportunities. Some of the planning brief's opportunities are shown in Figure 6 below.





#### **Conservation opportunity**

3.6.2 Islington's Core Strategy supports conservation-led regeneration proposals that conserve and enhance the borough's heritage assets. Any future development proposal will have the opportunity to set out how it will successfully refurbish this important historic asset in a way that retains the Fire Station's most important historical features and modernises the Station to accommodate a range of uses.

#### **Active street frontage**

3.6.3 Policy BC 6 encourages active ground floor uses across the site. Refurbishment of the Fire Station will create the opportunity to provide active street frontage on the ground floor of the Fire Station and along Topham Street and Coldbath Square.

#### Level differences

3.6.4 The Fire Station site drops in level from Farringdon Road to Coldbath Square. As part of the previous development of the site, the ground level was raised along Coldbath Square and parts of Topham Street to make the yard at one level. Any future development proposal should explore how they can exploit the drop in levels to make the most efficient use of the site, whilst also

delivering an accessible and inclusive environment. In particular, there may be scope to maximise the amount of residential floorspace along Coldbath Square through ensuring new buildings are similar in proportion to existing buildings along the north side of the street.

#### **New development**

3.6.5 The Finsbury Local Plan encourages development in this area that relates positively to neighbouring buildings and reinforces the predominant perimeter block character of North Clerkenwell. The Plan also encourages new development that breaks up the inactive, blank and monotonous frontages that surround some development sites in the area. Infill development along Coldbath Square and Topham Street can reinforce the perimeter block character of the area and provide an active street frontage.

#### **New homes opportunity**

3.6.6 Conversion of the upper floors of the Fire Station building and infill development along sections of the Station's yard facing Topham Street and Coldbath Square should deliver a range of new homes including affordable homes, especially social rented housing. There is also the opportunity to provide homes suitable for families, which is a priority within Finsbury Local Plan for North Clerkenwell.

#### Open space opportunities

- 3.6.7 Any future development proposal should provide high quality open space within the Station's yard. The open space will be mainly for use by future residents living within the site. Any proposal should also include a dedicated outdoor space that is attached to a new museum or publicly accessible social infrastructure use. This will help to preserve the historic relationship between the building and yard and improve public access into the yard. Maintaining the yard as an open space will help protect the setting of the Fire Station.
- 3.6.8 There is also an opportunity to transform the forecourt area into a high quality public space for the local community. Improvements could include an improved footway, seating and more greenery. There are also opportunities to use the former underground public toilets for a new community use. Any future development proposal should pay a contribution towards transforming the forecourt area including the former public toilets.

# 4. Development guidelines

4.0.1 This section outlines the key guidelines for any future development proposal for Clerkenwell Fire Station. The guidelines are intended to help explain how the Council will apply its planning policy framework. Further information on planning policies and guidance is provided in Appendix 2 of this planning brief.

# 4.1 Development objectives

**4.1.1** The development objectives are consistent with the Core Strategy objectives. The planning brief's objectives are set out below:

#### **Conservation (Core Strategy Objective 5)**

**4.1.2** The Core Strategy encourages conservation-led regeneration schemes that enhance Islington's historic environment. The Fire Station building is a historic asset and an important part of the borough's historic environment. Therefore any future refurbishment proposal must conserve and enhance the Station building.

#### Social infrastructure (Core Strategy Objective 9)

4.1.3 The provision of local services in accessible locations is supported by the Core Strategy. The Fire Station forms part of Islington's social infrastructure and is highly accessible to local residents. The Core Strategy identifies a need for new, improved or expanded community facilities in this area. Therefore, refurbishment proposals for the Station should provide a suitable social infrastructure use or uses.

#### Homes (Core Strategy Objectives 2 and 3)

4.1.4 The Core Strategy prioritises the delivery of new homes including a range of types and sizes to encourage mixed communities. The Fire Station sits within a highly unaffordable area of the borough, which also suffers from an acute shortage of family sized homes. Any future development proposal must deliver the maximum reasonable amount of affordable housing and some family sized homes. In line with Core Strategy Policy CS 12, 70% of the affordable homes provided on-site should be social rented housing.

#### **Design (Core Strategy Objectives 4 and 17)**

4.1.5 The Core Strategy expects new developments to provide a high quality and inclusive environment that promotes walking. Currently, the site's boundary walls are not in keeping with the character of the area. Any future development proposal should re-establish the perimeter block character of the area and provide active street frontage along Coldbath Square and Topham Street.

### 4.1.6 Open space (Core Strategy Objectives 4, 6 and 15)

The Council expects new developments to deliver high quality and accessible open spaces. Such spaces should also help to promote healthier and more active lifestyles. The Fire Station's yard is currently a poor quality and inaccessible private space. Any future development proposal should provide high quality amenity space for future residents within the Station's yard. Applicants will also be required to provide a dedicated outdoor space that is attached to a new museum or publicly accessible social infrastructure use.

# 4.2 Planning considerations

4.2.1 The Council expects the redevelopment of the planning brief site to positively contribute to making North Clerkenwell a focal point for the wider community. The following headings identify some of the key planning considerations for the site that any future development proposal should consider.

#### Conservation

- 4.2.2 As a Grade II listed building, Clerkenwell Fire Station is an important heritage asset. According to English Heritage, it is one of the best examples of a remarkable group of fire stations built by the LCC between 1900 and 1914. Importantly, the front and rear elevations are virtually intact, displaying the quality of materials and attention to detail that were the hallmarks of LCC civic design in the Edwardian period.
- 4.2.3 This brief seeks to ensure that any future development proposal delivers a refurbished and modernised fire station building that retains its architectural integrity. While any future development proposal will be expected to provide a modernised building that can accommodate a range of uses and meet Islington's standards, this should not be at the expense of its architectural and historic interest. Any future development proposal should ensure that the building continues to explain its role as a historic fire station through its layout, plan-form, features and materials. Any future development proposal will be required to submit a heritage statement that sets out how their proposal will achieve this (see Appendix 2, A2.2.33-34 for further information).
- 4.2.4 Any future development proposal must clearly take account of the key conservation and design policy requirements including the Conservation Area Guidelines for Rosebery Avenue and Clerkenwell Green.
- 4.2.5 In line with Finsbury Local Plan Site Allocation BC 44, development proposals are expected to follow the advice and important principles for refurbishing historic fire stations set out within the English Heritage/London Fire Brigade joint guidance note 'London's Historic Fire Stations'. The Guidance Note provides important principles for refurbishing London's historic Fire Stations.
- 4.2.6 The Guidance Note advises that, as a principle, the plan-form or layout of historic fire stations should be retained or returned to their historic designs. If layouts become redundant they should remain legible. If the layouts of the interior of the fire station change, it should be possible to understand the original layout from the proposed floorplan. Based on this overall principle, the brief seeks to ensure that the original plan-form and layout of the Station should be retained or returned in the following instances:
  - Appliance room: the relationship between the appliance room, watch room and entrances
    is of historic significance and should be maintained. Proposals should seek to retain the
    appliance room's original open-plan layout and historical character.
  - Mess room: the mess room retains its distinctive open plan aspect. Development proposals should propose a use that can accommodate the entire space.
    - Residential accommodation: the flats should be returned to their original layout. If this is not feasible, the original layout should remain legible in all the flats and at least one flat should be retained within it's original layout.
  - Circulation space: the building's internal circulation spaces, including the main stair should be retained. Proposals must retain the rear landings (balconies) and develop proposals for fully utilising the potential of these spaces to provide private amenity space for homes.

- 4.2.7 The Guidance Note also advises that, as a principle, items of significance should be protected. It states that if features are deemed redundant then they should remain legible and original materials must be retained. Based on this principle, the brief seeks to retain a number of the Station's features and items of significance. The list below is not exhaustive and additional items may be required when a full planning application is submitted:
  - Materials: the mess room's dado wood panelling, the glazed wall tiles within the building's
    main stair and the fireplace tiles should be retained along with the rest of the building's
    historic fabric. If any future development proposal wishes to replace the appliance room's
    doors, these should be replaced with traditional panelled timber folding doors with glazing
    in the upper sections and painted red.
  - Fixtures and fittings: proposals should retain the original built-in cupboards, original fireplaces, main stair's iron balustrade, the rear landing's iron railings, poles, pole-housing and associated joinery and historic signage. Any future development proposal should also develop innovative ways to use the original drill tower.
  - The communal washroom: the washroom (laundry) has particular historic importance.
     Proposals are required to develop innovative ways of preserving and enhancing this room with its existing fixtures and fittings for a more contemporary use. It could be used as part of a museum located within the Fire Station building.
- 4.2.8 Any future development proposal, which includes new development in the site's curtilage, will also need to consider the impact upon the setting of the Fire Station building, the listed buildings at 40 Rosebery Avenue and 94 Farringdon Road and the impact on Rosebery Avenue and Clerkenwell Green Conservation areas. A perimeter block approach along Coldbath Square and Topham Street is likely to offer the best solution in terms of impact on the setting of the listed buildings and the neighbouring conservation areas. Infill development along Farringdon Road entrance to the site would not be considered acceptable, because it would harm the setting of the Station building's rear elevation.
- 4.2.9 New development is encouraged to use brick and modern materials that can creatively and positively respond to the architecture of the Fire Station. In doing so, development proposals should consider how the use of such materials improve the setting of the Station and enhance the character of Rosebery Avenue and Clerkenwell Green Conservation Areas. The use of render will not be permitted.

#### Social infrastructure

- **4.2.10** The Fire Station is classed as social infrastructure for planning policy purposes. In line with Development Management Policy DM 4.12, any future development proposals will be expected to incorporate suitable social infrastructure uses for the Fire Station building.
- 4.2.11 The Council's preferred use for the lower floors of the building, including the basement, ground floor and first floor is as a museum for the London Fire Brigade. The basement could be used to house the London Fire Brigade's archive, which would ensure that the museum and archive continue to be housed in in the same location. As mentioned previously, the appliance room, watch room and mess room all have historic and architectural interest. If a museum was housed within the Fire Station, there would also be opportunities to use the communal washroom and/or the drill tower as part of the museum. Any future development proposal should use part of the Station yard as an outdoor area that is attached and ancillary to the Museum/publicly accessible social infrastructure use. It should be accessible via the building and from Farringdon Road. This space will help to improve public access into the yard and maintain the historic relationship between the Fire Station building and the Station yard. It could be used as an outdoor café area or an outdoor exhibition space.

- **4.2.12** With excellent public transport links, the Fire Station would be highly accessible to potential visitors. It would also be located in close proximity to the proposed British Postal Museum, which is due to open in 2016 next to the Mount Pleasant Sorting Office. Visitors to either museum would benefit from the close proximity of the two museums to each other.
- **4.2.13** If this is not feasible, any development proposal should include other publicly accessible social infrastructure uses. Appropriate uses include a public arts centre or a community centre.

#### **New homes**

- 4.2.14 The Council would welcome proposals for residential use. Finsbury Local Plan Site Allocation BC 44 accepts that there is scope to convert the upper floors of the Fire Station building into residential accommodation and provide residential uses in parts of the Station's yard. Such proposals should seek to deliver a range of types and sizes of new homes that meet the Council's housing policies. In line with Finsbury Local Plan Policy BC 6, this should include some family-sized homes. Future applicants are encouraged to engage with the Council at an early stage to discuss their proposed mix of housing types and sizes.
- 4.2.15 Core Strategy Policy CS 7 requires major developments in Bunhill and Clerkenwell to improve the public realm, provide ample private or semi-private and public open space in the Finsbury area. Any future development proposal should use the Station's yard to provide a high quality accessible open space primarily for use by future residents. Any proposed open space should be overlooked by the Fire Station building and new development in the Station's yard.

#### Affordable homes

- 4.2.16 The public consultation on the draft planning brief found that the majority of respondents supported the delivery of the maximum number affordable homes on the site. Nearly a third of all comments about the planning brief were about affordable housing. Many respondents wanted new homes to be affordable for people that live and work in the local area. These responses clearly support the planning brief's objective to ensure the maximum amount of affordable homes is provided across the planning brief site.
- **4.2.17** In line with Core Strategy Policy CS 12, any future development proposal must provide the maximum reasonable amount of affordable housing. 70% of affordable homes provided must be social rented housing. The Council will only consider delivery of affordable rented homes in lieu of social rented homes where certain minimum conditions are met, including:
  - confirmed delivery agreement between a developer and a Registered Provider (housing association);
  - affordable rent units will be delivered at rents equivalent to target rents (as determined by Government guidance on rents for social housing); and
  - a legal agreement with the Council that ensures target rent in perpetuity for new affordable rent properties.
- 4.2.18 The Council will shortly publish a guidance note on affordable rent. The note will provide detailed guidance for developers and registered providers on the Council's approach to affordable rent homes in Islington, including guidance on rent levels for affordable housing that are appropriate to Islington.
- 4.2.19 The Affordable Housing Statement should provide information on the level and mix of affordable housing (see Appendix 2, A2.2.7). In line with Core Strategy Policy CS 12, a viability assessment will be required to demonstrate that the maximum reasonable amount of affordable housing, especially social rented housing, has been provided on-site (see 4.2.20-4.2.23 for further information).

#### **Development viability**

- **4.2.20** Core Strategy Policy CS 12 requires that a viability assessment is submitted to the Council for any future development proposal for the planning brief area. The viability assessment should be shared with the Council prior to the submission of a planning application.
- 4.2.21 The Council adopted the Planning Obligations SPD in November 2013. This sets out the Council's approach to assessing development viability. The SPD, at paragraph 9.31, states that "there are currently a number of sources of guidance relating to development viability. These guidance notes take a range of approaches to certain aspects of development viability. It is for the Council to determine the most appropriate approach to be taken in each case. Applicants and their agents should discuss this with the Council at an early stage."
- 4.2.22 The existing use value plus a landowner premium is a commonly taken approach to 'benchmark' or 'threshold' the land value. The premium is based on a land payment that is likely to release the land for development, taking into account the circumstances of the site. The Council considers that the existing use value plus a landowner premium is the most appropriate approach to take for the planning brief site. A viability assessment for any future development proposal for Clerkenwell Fire Station should benchmark the land value based on the site's existing use as a fire station, plus a premium to release the site for development.
- 4.2.23 The Council's development plan policies must be fully taken into account when a viability assessment is prepared for any future development proposal for the site, in particular Core Strategy Policy CS 12. A viability assessment must demonstrate that the maximum reasonable amount of affordable housing has been provided. Policy CS 12 requires 50% of housing, over the development plan period, should be affordable at a ratio of 70% social rented and 30% intermediate. Therefore, 50% affordable housing must be the starting point when determining whether the maximum reasonable amount of affordable housing has been provided. If it is found that the site is unviable when tested with 50% affordable housing, affordable housing provision should be tested at levels close to 50%, and then incrementally until the maximum reasonable level has been established.
- 4.2.24 If a future development proposal for the Fire Station falls short of the development plan requirements, a review mechanism will be required as part of a section 106 agreement for the site. In these circumstances, a revised viability assessment will be required prior to the implementation of the scheme. If the revised assessment demonstrates that the proposed development is capable of providing additional affordable housing, or other requirements that would have otherwise been necessary, the developer will at that point be required to provide this.
- 4.2.25 Information on preparing an appropriate viability assessment is provided in Islington's Planning Obligations SPD paragraphs 9.29 to 9.46. The council intends to set out guidance in a Development Viability Supplementary Planning Document (SPD) on the application of policies in the Development Plan in relation to how viability matters are dealt with when determining planning applications. Any subsequent guidance on viability produced by Islington Council should also be followed.

#### General design principles

4.2.26 New development should be accessible, appropriate to its context, and designed to improve the character and quality of the area and the way it functions. Plans should address requirements for sustainability, inclusivity, security, biodiversity, landscaping and security. Inclusive design principles must be applied to the design of all buildings and spaces. All new homes, including those created through change of use, will need to meet Islington's housing standards. Further information on these requirements is contained within Appendix 2.

4.2.27 The site's southern and eastern boundary walls along Topham Street and Coldbath Square provide inactive and blank frontage. Furthermore, there are no buildings along this section of the site. In line with Finsbury Local Plan Policy BC 6 Part B, new buildings should re-establish the perimeter block character along Topham Street and Coldbath Square. In addition, any proposed new building should face the street with their main entrances onto the street, providing active street frontages.

#### Height, scale and massing

- 4.2.28 Site Allocation BC 44 aims to reinforce the perimeter block character of the area around the site. In order to help achieve this, new development should be of a similar scale and massing to neighbouring buildings. The height of any new building should be similar to neighbouring buildings and lower than the Fire Station. This will help to reinforce the perimeter block character of the area and protect the setting of the Fire Station. The acceptability of the exact height of new buildings will also depend on the design, treatment of roofs and the layout of development proposals.
- 4.2.29 Applicants should consider whether the drop in levels across the site can be exploited to maximise floorspace along Coldbath Square. This could be achieved through developing buildings similar in proportion to existing buildings along the north side of Coldbath Square.
- 4.2.30 The site falls within the 'Kenwood to St Pauls' viewing corridor (London View Management Framework SPD), any development proposal will need to take this strategic view into account when determining the height and shape of any future development proposal. Where necessary applicants will need to provide appropriate supporting material to verify the visual impact of the view.

#### **Residential Amenity**

- 4.2.31 Any future development proposal should protect the amenity of residents in neighbouring buildings. Development Management Policy DM 2.1 requires consideration of a number of issues to achieve this including access to direct sunlight and daylight, privacy and outlook. A full planning application for the site will be required to submit a full daylight/sunlight assessment, which will assess the impact of any future development proposal upon residents' access to direct sunlight and daylight (See Appendix 2, A2.2.18-19). A future development proposal that was significantly detrimental to residents in neighbouring buildings would not be permitted.
- 4.2.32 Any future development proposal will also be required to demonstrate a high standard of amenity can be achieved for future residents. These residents could be exposed to high levels of noise and air pollution along Rosebery Avenue and Farringdon Road. A full planning application for the site will be required to submit an Air Quality Assessment and Noise and Vibration Assessment. These assessments must demonstrate that residents will enjoy a high standard of amenity in regard to air quality and noise (See Appendix 2, A2.2.20-21).

### Inclusive design

- **4.2.33** The Council expects the urban design and architecture of any future development of the site to be of the highest quality. As identified in Core Strategy Policy CS 9, this will enhance and protect Islington's built environment, making it safer and more inclusive.
- 4.2.34 The Council also expects an inclusive and best practice approach to development and would expect the development of this site to reflect those principles and processes and accommodate new technologies, practices and attitudes. New development should produce aesthetically pleasing, functional environments that can be enjoyed by everyone, taking into account age, gender and disability. Development Management Policy DM 2.2 (Inclusive Design) provides more detail on the Council's requirements. The Inclusive Design SPD and Streetbook SPD explain how development proposals can meet these requirements.

4.2.35 All homes on the site should also be designed and managed to adapt to the changing needs and circumstances of users over their lifetime. In accordance with Core Strategy Policy CS 12 Part H, the Council will require that residential development on the site complies with 'flexible homes' standards, with at least ten per cent of housing being wheelchair accessible or easily adaptable for residents who are wheelchair users. 'Flexible homes' standards are set out in detail in Islington's Inclusive Design SPD.

#### Landscaping and biodiversity

4.2.36 Any development must demonstrate that it protects existing site ecology and makes the fullest contribution to enhancing biodiversity, including through the incorporation of biodiversity-rich green roofs on new development, soft landscaping, bird and bat boxes. Negative impacts from construction also need to be considered and mitigated against where possible. A landscape plan should be submitted as part of any proposal (see Appendix 2, Section A2.2.23).

#### Sustainability and Climate and Change

- 4.2.37 Any new development must meet the highest standards of sustainable design and construction and promote sustainability through long term management (see Appendix 2, A2.2.24 for further information on the Council's requirements).
- 4.2.38 As part of any future development proposal, a Sustainable Urban Drainage System (SUDS) will need to be incorporated. As there is a drop in level across the site, this feature should inform the development of a SUDS across the site. Any proposed SUDS should be consistent with Development Management Policy DM 6.6 and London Plan Policy 5.13.
- 4.2.39 As part of Islington's commitment to delivering a reduction in energy demand, Development Management Policy DM 7.3 requires that any major development is designed to connect to a Decentralised Energy Network. This is further supported by Finsbury Local Plan Policy BC 6 Part E that requires major developments in North Clerkenwell connect to an existing or planned network.
- 4.2.40 When applicants are considering which measures can effectively mitigate and adapt to the effects of climate change, Development Management DM 2.3 Part G requires development proposals to explore all opportunities that do not harm the significance of heritage assets. Where conflict with climate change objectives is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of heritage assets.

#### **Access and circulation**

- 4.2.41 In accordance with Development Management Policy DM 8.6, all deliveries and servicing should be undertaken off-street and seek to mitigate the impact of servicing on traffic and parking congestion on local roads. To reduce road safety conflicts and congestion, all servicing/delivery vehicles should enter and exit the site in forward gear.
- 4.2.42 Any future development proposal should ensure appropriate levels of access for emergency services, servicing and refuse collection vehicles. Applicants are encouraged to maintain the Farringdon Road entrance as sole vehicular entrance for the site. Retaining this entrance will require minimal alterations and help protect the setting of the Fire Station building's rear elevation from Farringdon Road. If an applicant wishes to service on-site from another entrance to the site, such as from Topham Street or Coldbath Square, they should enter into early discussions with the Council on the suitability of such arrangements.

#### Transport and parking

4.2.44 The redevelopment of the site should encourage future occupants to use more sustainable modes of transport that reduce congestion on the local road network. The site is well served by public transport and a range of shops and local services can be accessed by foot or bicycle. Applicants

will be required to develop a full Transport Assessment and Travel Plan. Amongst other matters, any future development proposal should set out how it will encourage walking and cycling (see Appendix 2, A2.2.26-29).

- 4.2.45 Paragraph 8.37 of Development Management Policies also requires all parking related to the existing use and/or building must be included within the site boundary for any future application for that building. In line with the Core Strategy Policy CS 10 and Development Management Policy DM 8.5, any future development should also be strictly car-free unless it is essential for operational reasons.
- 4.2.46 New residents will not have the right to a Controlled Parking Zone permit. However, existing Islington on-street or estate parking permit holders (who have established permits of at least 1 year) will retain their right to a Controlled Parking Zone Permit if they move to a new home within the site.
- 4.2.47 The needs of disabled people and access to wheelchair accessible homes will be taken into account. Wheelchair parking spaces should be provided within the curtilage of the site.
- **4.2.48** The number of cycle parking spaces should be provided in line with Islington's standards. Spaces should also be secure, sheltered, integrated, conveniently located, adequately well-lit, step-free and accessible.

#### **Construction activities**

4.2.49 The Council will seek to ensure that disruption to local residents is minimised during all phases of construction. Core Strategy Policy CS 18 and the Planning Obligations SPD on Code of Construction Practice detail the Council's approach to this issue. Given the built up residential nature of much of the surrounding area, working hours of the sites and weekend working should be carefully selected to minimise the disruption to local residents.

# **Appendix 1 – Statement of community impact**

Who	Benefits	Concerns	Mitigating measures
Residents of neighbouring properties	Active ground floor uses along Topham Street and Coldbath Square have the potential to improve natural surveillance and levels of community safety	Potential for overlooking by new buildings in Coldbath Square and Topham Street	New buildings will be located to comply with design guidance on distances between habitable rooms
		Disruption during construction of new blocks and refurbishment of the fire building.	The Council will seek to ensure disruption to local residents is minimised. In line with Core Strategy Policy CS 18, development proposals will be required to sign up to the Council's Code of Construction Practice. This will require a careful consideration of working hours including weekend working.
Residents within the area	Potential for new high quality development and a successful refurbishment of the Fire Station building.	Poor design, in terms of height, scale massing or materials has the potential to impact on the setting of nearby listed buildings and the character of neighbouring conservation areas	Appropriate designs to ensure all new buildings are of very high architectural quality and contribute to the character of the Conservation Area and the setting of nearby listed buildings.
	New homes deliver a range of affordable homes to meet local housing needs.  New affordable homes also help to house people living in temporary accommodation and/ or over-crowded accommodation	New development mainly delivers private apartments that are unaffordable for most parts of the local community.	Islington's Core Strategy requires major developments to deliver the maximum reasonable level of affordable housing. 70% of any new affordable housing should be charged at social rents. The remaining 30% should be for intermediate tenures, such as shared ownership or submarket rent.

	New development delivers a range of new homes that can meet local housing needs including family sized homes.	New development delivers mainly 1 and small 2-bed apartments that are not suitable for local families.	Islington's Development Management Policies DPD and the Finsbury Local Plan require new development in North Clerkenwell to a range of types and sizes of new homes including family sized homes.
	Potential for new community facilities to serve the local community	No suitable social infrastructure uses are provided as part of a redevelopment proposal. A key community asset is turned into a private development that does not provide benefits for the whole community.	In line with Development Management Policy DM 4.12, the planning brief specifically requires developers to develop proposals to convert parts of the Fire Station building for other suitable social infrastructure uses.
	Existing Islington residents retain their right to a parking permit.	New residents create pressure on on-street parking spaces and add to congestion on local roads.	The development will be required to be car-free. New residents will be forbidden from securing an on-street parking permit. However, existing Islington on-street or estate parking permit holders (who have established permits of at least 1 year) will retain their right to a Controlled Parking Zone permit if they move to a car free development within the borough.  To help encourage more travel by bicycle, new development must meet the Council's high standards on cycle parking (1 space per bedroom).
Local businesses within the area	New residents within the Fire Station building and new blocks use local shops and services.	New development creates new retail, cafes and restaurants that compete with local provision in Exmouth Market and	The planning brief requires that new retail, café and restaurant provision complements existing local provision.

		other locations.	
Future occupants of housing	Provision of high quality housing, affordable housing and homes suitable for families.	New homes may be provide insufficient levels of amenity for future residents especially in terms of noise and air pollution.	Development proposals must demonstrate that a high standard of amenity can be achieved for future residents.  In particular proposals will need to demonstrate how they will mitigate the high levels of noise and air pollution along Rosebery Avenue and Farringdon Road.  This approach is supported by Site Allocation BC 44 of the
	Redevelopment of the site provides high quality amenity space for future occupants.	Redevelopment leaves existing car parking and servicing hard standing spaces unchanged. Residents do not have access to high quality open space.	Finsbury Local Plan  Islington's Development Management Policies set out detailed and robust standards on amenity space requirements. This will ensure that any new development provides adequate levels of amenity space for new homes.

# **Appendix 2 – Planning requirements**

# A2.1 Key planning policies

A2.1.1 The following sections identify most of the key policies relevant to any future development of the Clerkenwell Fire Station planning brief site. However, this list is not exhaustive, and any future development of the site should comply with all of the planning policies that are relevant.

#### **London Plan**

- A2.1.2 The London Plan is available for download at the following web address: http://www.london.gov.uk/priorities/planning/londonplan
- A2.1.3 Key policies from the London Plan that are relevant to the planning brief area include (but are not limited to):
  - Policy 2.12: Central Activities Zone predominantly local activities
  - Policy 3.5: Quality and design of housing developments
  - Policy 3.8: Housing choice
  - Policy 3.14: Existing housing
  - Policy 3.18: Education facilities
  - Policy 5.13: Sustainable Urban Drainage
  - Policy 7.2: An inclusive environment.
  - Policy 7.4: Local character
  - Policy 7.5: Public realm
  - Policy 7.8: Heritage asset and archaeology

#### **Core Strategy**

- A2.1.4 Islington Council's Core Strategy is available for download at the following web address: http://www.islington.gov.uk/services/Planning/planningpol/local\_dev\_frame/pol\_corestrat/
- A2.1.5 Key policies from the Core Strategy that are relevant to the planning brief area include, (but are not limited to):
  - Policy CS 7: Bunhill and Clerkenwell
  - Policy CS 9: Protecting and enhancing Islington's built and historic character
  - Policy CS 10: Sustainable design
  - Policy CS 12: Meeting the housing challenge
  - Policy CS 13: Employment spaces
  - Policy CS 15: Open space and green infrastructure

### **Development Management Policies DPD**

- A2.1.6 Islington Council's Development Management Policies DPD is available for download at the following web address:
  - https://www.islington.gov.uk/services/planning/planningpol/local\_dev\_frame/Pages/development-management-policies.aspx
- A2.1.7 Key policies from the Development Management Policies DPD that are applicable to the planning brief area include, (but are not limited to):
  - Policy DM 2.1: Design
  - Policy DM 2.2: Inclusive design
  - Policy DM 2.3: Heritage
  - Policy DM 2.4: Protected views
  - Policy DM 3.1: Mix of housing sizes
  - Policy DM 3.3: Residential conversions and extensions
  - Policy DM 3.4: Housing standards
  - Policy DM 3.5: Private outdoor space
  - Policy DM 3.6: Playspace
  - Policy DM 3.7: Noise and vibration (residential uses)
  - Policy DM 4.4: Promoting Islington's town centres
  - Policy DM 4.12: Social and strategic infrastructure uses
  - Policy DM 6.1: Healthy Development
  - Policy DM 6.5: Landscaping, trees and biodiversity
  - Policy DM 6.6: Flood prevention
  - Policy DM 7.1: Sustainable design and construction
  - Policy DM 7.3: Decentralised energy networks
  - Policy DM 7.4: Sustainable design standards
  - Policy DM 7.5: Heating and cooling
  - Policy DM 8.2: Managing transport impacts
  - Policy DM 8.5: Vehicle parking

#### **Finsbury Local Plan DPD**

- A2.1.8 Islington Council's Finsbury Local Plan is available to download from the following web address: <a href="https://www.islington.gov.uk/services/planning/planningpol/local\_dev\_frame/Pages/finsbury-local-plan.aspx">https://www.islington.gov.uk/services/planning/planningpol/local\_dev\_frame/Pages/finsbury-local-plan.aspx</a>
- A2.1.9 Key policies from the Local Plan include (but are not limited to):
  - Site Allocation BC 44: Clerkenwell Fire Station
  - Policy BC 6: North Clerkenwell and Mount Pleasant
  - Policy BC 8: Achieving a balanced mix of uses
  - Policy BC 9: Tall buildings and contextual considerations for building heights

#### Other policy documents

- **A2.1.10** Other relevant planning policy documents relevant to the planning brief site include:
  - Urban Design Guide Supplementary Planning Document (2006)
  - Planning Obligations Supplementary Planning Document (2013)
  - Inclusive Design in Islington S Supplementary Planning Document (2014)

- Streetbook Supplementary Planning Document (2012)
- Environmental Design Supplementary Planning Document (2012)
- Roseberry Avenue Conservation Area Guidelines (2002)
- Clerkenwell Green Conservation Area Guidelines (2002)
- London View Management Framework Supplementary Planning Guidance (2012)

## **A2.2** Planning application requirements

A2.2.1 The Council strongly recommends that pre-planning application discussions be undertaken prior to submitting a planning application, so that the Council and developer can discuss the proposal and determine the relevant documents and information that will be needed to process any planning application. Full details of pre-planning procedure and applicable fees can be obtained from Council's web site at <a href="https://www.islington.gov.uk">www.islington.gov.uk</a> or by contacting the planning division on:

Email: <u>Planning@islington.gov.uk</u>

Tel: 020 7527 2813Fax 020 7527 2731

For a development on this site a full planning application is required.

#### Validation requirements

- A2.2.2 The Council uses an online planning application system. Paper versions of all planning application forms are available. For this site Form 004 should be completed. For more information go to the following web address:

  www.islington.gov.uk/services/planning/Pages/default.aspx?extra=4
- A2.2.3 The online planning system is accompanied by a standard set of validation requirements. That is, the list of documents that must be included with a planning application. For a full list of the validation requirements refer to the Planning Advice Note: Planning Applications validation requirements. This document can be found at the following web address <a href="http://www.islington.gov.uk/DownloadableDocuments/Environment/Pdf/planapps/validation\_requirements.PDF">http://www.islington.gov.uk/DownloadableDocuments/Environment/Pdf/planapps/validation\_requirements.PDF</a>
- A2.2.4 There are a number of key documents that would need to be included. The following sections provide more detail on some of the key validation requirements for the planning brief area.

#### **Planning Statement**

- A2.2.5 A planning statement will be required as part of a full planning application. Applicants are required to include a range of information within the Statement including
  - A summary of the proposed development and its key impacts;
  - A description of the site, its context and planning history;
  - A summary of relevant national, regional and local planning policies and guidance and explanations as to how/why the proposed development accords or fails to accord with them;
  - Details of consultations with the wider community, local planning authority and statutory and other consultees
- A2.2.6 If any loss of social and strategic infrastructure floorspace is proposed, the Statement must include a full justification. The justification must addresses the requirements set out within

Development Management Policy DM 4.12, Paragraph 4.65 of Development Management Policies and Appendix 11 of Development Management Policies.

### **Heritage Statement**

- A2.2.7 A heritage statement will be required. The heritage statement should demonstrate a clear understanding of the significance of the affected listed buildings, their settings and surrounding conservation area. The statement must also explain the impact of the development proposal upon the listed buildings and conservation area.
- A2.2.8 The Council recommend that an assessment of the historic and architectural significance of the building and its setting should be undertaken at the outset and used to drive any redevelopment proposals for the site. The assessment should be undertaken by a heritage professional with experience of assessing historic buildings. To understand significance, the assessment must understand the building in the context of the historical development of the London Fire Brigade, focusing on architecture and service provision, in order to understand what is special about this building.

#### **Affordable Housing Statement**

A2.2.9 An affordable housing statement will need to be prepared as part of a full planning application. The statement should set out the level and mix of proposed on-site affordable housing provision, numbers of habitable rooms, and floorspace of habitable areas. The statement should also set out the approach and justification for the level of affordable housing, and provide details of any Registered Providers acting as partners in the development along with details of nomination rights and a schedule of accommodation.

#### **Viability Assessment**

A2.2.10 As any future development proposal is expected to include at least ten residential units, a viability assessment will be required. Sufficient information must be provided on an open book basis to enable the viability of the proposed development to be comprehensively assessed. The assessment must be provided prior to the submission of the planning application. The assessment should be prepared in line with the guidance set out within Paragraphs 9.29-9.47 of the Council's Planning Obligations SPD.

#### **Design and Access Statement**

- A2.2.11 The purpose of a Design and Access Statement is to explain how the proposals have evolved and their suitability for the site. It is an opportunity for the developers and designers to demonstrate their commitment to sustainable, inclusive and accessible design and how they will meet various obligations placed on them by legislation and local policies.
- A2.2.12 The Design and Access Statement should be primarily be concerned with:
  - the proposed layout;
  - the proposed height, scale and massing of any new development; and
  - the relationship with the wider street network including movement into and across the site
- A2.2.13 The Statement should also establish the principles and spatial framework that will facilitate compliance with Building Regulations (as a minimum) and wherever possible best practice. The Statement should clearly identify:

- the philosophy and approach to inclusive design;
- the key issues of the particular scheme, including identified constraints, e.g. listed buildings;
- the sources of advice and guidance used;
- evidence of consultation, planned or in progress, with disabled people in the local community, including feedback and how this has been/ will be included into the design process; and
- how the principles of inclusive design will be implemented into the scheme, including maintenance and management
- A2.2.14 The Statement should be viewed as part of the process; as a tool to demonstrate that all relevant issues have been considered throughout the design and construction stages. At the planning stage it should clearly demonstrate the applicant's approach to inclusion and show how all potential users, taking into account ability, age and gender differences can enter the site, move around the site, enter and circulate the buildings and use the facilities, including sanitary provision.
- A2.2.15 It is recommended that a marked-up plan at an appropriate scale, including sections showing relevant gradients and any changes in level, is submitted with the Design and Access Statement. The statement should give details of any national standards used, e.g. BS8300:2009 and Inclusive Mobility (outdoor pedestrian guidelines), and in the case of residential development, Lifetime Homes and Wheelchair Housing Standards.
- A2.2.16 Major schemes applicants are advised to appoint an appropriately skilled and independent access consultant or access champion to work with designers and the project team through to completion of the project.
- A2.2.17 The applicant would also be advised at this stage to consider the implications of the Equalities Act 2010, to ensure that the design and management of the scheme uphold the spirit of the Act and mitigate the chances of any legal challenges.
- A2.2.18 Further guidance on the preparation of Design and Access Statements can be found on the Council website at the following web address:

  <a href="http://www.islington.gov.uk/services/planning/planninginisl/plan conserve/urban design/inclusive/pages/AccessStatements.aspx">http://www.islington.gov.uk/services/planning/planninginisl/plan conserve/urban design/inclusive/pages/AccessStatements.aspx</a>

## **Daylight / Sunlight Assessment**

- A2.2.18 Daylight/Sunlight assessments are required where there may be a potential adverse impact on current levels of sunlight / daylight enjoyed by adjoining properties or building(s), including associated gardens or amenity space. Or where new residential properties are created within a restricted setting.
- A2.2.19 The assessment should conform to the methodology identified in the Building Research Establishment guidance 'Site layout planning for daylight and sunlight: A guide to good practice' (2011). It should identify and examine the impacts upon existing properties and sites with extant planning permissions. In restricted settings the report should also cover the final daylight and sunlight values achieved within the proposed scheme.

#### **Air Quality Assessment**

A2.2.20 The planning brief is located within an area of poor air quality and, therefore, an air quality assessment will be required. If residential uses are proposed, the assessment should include details of how any such uses can be successfully accommodated through effective mitigation measures.

#### **Noise Impact and Vibration Assessment**

A2.2.21 Noise impact and vibration assessments are required for development proposals that include residential uses and other noise sensitive development. If any future development proposal includes residential uses and/or other noise sensitive development, a noise assessment should be prepared by a suitably qualified acoustician, detailing Noise Exposure Categories and concomitant impact and mitigation measures, including layout, design and insulation.

### **Health Impact Assessment (HIA)**

A2.2.22 All major development are required to submit a HIA. This should demonstrate the impact of the proposal on health, wellbeing and health inequalities. A screening HIA is required for residential developments between 10-199 residential units at pre-application stage to assess whether a full HIA is required. The Council's HIA Guidance Note provides guidance on what information should be provided for each stage of the HIA process. A copy of the Note can be found here: <a href="http://www.islington.gov.uk/publicrecords/library/Planning-and-building-control/Publicity/Publicconsultation/2014-2015/(2014-05-28)-2.-HIA-guidance-note-2014.pdf">http://www.islington.gov.uk/publicrecords/library/Planning-and-building-control/Publicity/Publicconsultation/2014-2015/(2014-05-28)-2.-HIA-guidance-note-2014.pdf</a>

#### Landscape Plan

A2.2.23 All major and minor development proposals that contain significant elements of landscaping are required to submit a landscape plan. Any future development proposal should submit a landscape plan that is consistent with Development Management Policy DM 6.5 (Landscaping, trees and biodiversity). Appendix 12 of the Development Management Policies provides further details on which elements the Council expects to be included within any landscape plan.

#### **Sustainable Design and Construction Statement**

- A2.2.24 The Sustainable Design and Construction Statement (SDC) should set out how the development will comply with Core Strategy Policy CS 10, Development Management Policies, especially DM 7.1 and London Plan Policies within Chapter 4A. The SDC key areas include:
  - Energy and carbon emissions: the SDC Statement should include an Energy Statement.
     The statement should demonstrate compliance with the total (regulated and unregulated)
     CO2 emissions target in Core Strategy Policy CS10.
  - BREEAM and Code for Sustainable Homes: a BREEAM or CSH pre-assessment should be included. This should summarise the design strategy for how the proposed development will achieve either BREEAM Excellent or CSH Level 4.
  - Water consumption: details of how water efficiency has been maximised and a predicted water use target should be provided. A feasibility analysis of using rainwater harvesting or greywater recycling is also required.
  - Biodiversity and landscaping: all development should assess whether they are likely to have an impact on biodiversity. Details of where a development will enhance biodiversity should also be included.
  - Climate change adaptation: the statement should include details of which measures will

- be used to reduce surface water run-off and avoiding overheating.
- Materials, waste and construction impacts: the statement should demonstrate how the scheme has minimised materials use, including by minimising waste and the impacts of demolition and construction.
- Operational sustainability: details are required of how the development will be managed to promote effective and sustainable performance in use. This should include a Green Performance. A draft of this plan should be submitted along with the SDC Statement.
- A2.2.25 Further guidance on what information the Sustainable Design and Construction Statement should include for major planning applications can be found in Appendix 7 of the Environmental Design SPD. The document is available for download from the following web address:

  <a href="https://www.islington.gov.uk/services/planning/planningpol/pol\_supplement/Pages/Environmental-Design.aspx?extra=13">https://www.islington.gov.uk/services/planning/planningpol/pol\_supplement/Pages/Environmental-Design.aspx?extra=13</a>

### **Transport Assessment**

- A2.2.26 The Transport Assessment for any future development of the planning brief area should be prepared in accordance with the Council's Development Management Policies. In particular, Transport Assessment should pay particular regard to the policies contained within Chapter 8 and Appendix 5 of the Development Management Policies.
- A2.2.27 A Transport Assessment is required to assess the impact of any future development proposal for the planning brief area on transport infrastructure, including the capacity of roads, public transport and walking and cycling infrastructure, and detail action to mitigate this impact. It should present qualitative and quantitative information about the anticipated transport and related environmental impacts before, during and after implementation of the proposed development, including details of the accessibility of the site by all transport modes and all users, including disabled people, and the likely modal split of journeys to and from the site. For instance, if the local underground stations are inaccessible to mobility impaired users, this will reduce the convenience of the site. Any development should therefore consider from the outset a range of accessible sustainable transport options, such as; safe drop off, storage and charging facilities for mobility scooters and accessible cycle parking.
- A2.2.28 The Travel Plan for any future development of the planning brief area should be prepared in accordance with Appendix 5 of the Council's Development Management Policies and submitted with any planning application.
- A2.2.29 Travel Plans are required to detail the developer's response to the Transport Assessment, and to deliver sustainable transport objectives with a package of measures to promote sustainable transport, including measures to achieve a modal shift to the most sustainable forms of transport: walking and cycling.

#### **Waste Management**

- **A2.2.30** The Waste Management Plan for the site should indicate:
  - the estimated volumes and types of waste produced by the development
  - the size and location of waste and recycling stores and how recyclable material and other waste will be delivered to these stores
  - the equipment specified for containing the waste
  - the proposed collection point and the method for transferring waste to this location

- A2.2.32 The development must have on-site provision for secure and easily cleaned refuse storage. The facilities provided must comply with the requirements for off-highway containment of refuse set out in Islington Council's Refuse and Recycling Storage Guidance for Architects. Waste collection arrangements should accord with Building Regulation H6.
- A2.2.33 Full details of proposals should be included on all plans submitted and advice can be obtained from Islington's Street Environment Services at any stage during design works.

# **A2.3** Planning obligations

- A2.3.1 Planning obligations are used as part of the planning application process in order to address specific issues arising from a development proposal. They are normally agreed between the Council, land owners and developers within legal agreements (Section 106 agreements) and are intended to make a development acceptable which would otherwise be unacceptable in planning terms.
- A2.3.2 The agreements include obligations which are specific requirements to be fulfilled by developers to ensure that impacts arising from new developments are addressed and that sufficient infrastructure and facilities are in place to cope with additional residents, workers and visitors in the new development. Planning obligations can help to ensure that new development is sustainable and assists in meeting the objectives of the Council's Core Strategy and other relevant policies.
- A2.3.3 The Council will therefore seek to enter into a Section 106 (S106) agreement as part of any planning application for development, in accordance with the Council's adopted guidance on planning obligations, to mitigate additional pressures on local infrastructure and facilities, and to ensure the scheme is compliant with planning policy where relevant.
- A2.3.4 Possible S106 Heads of Terms for this site will include (but will not be limited to) the following matters:
  - Provision of affordable housing on site in line with the Council's adopted policy
  - A financial contribution towards public realm improvements around the planning brief site including the Clerkenwell Fire Station forecourt area and the underground former public toilets
  - The repair and reinstatement of the footways and highways adjoining the development and payment to cover the costs of any other works relating to the necessary alteration of the public highway
  - Compliance with the Code of Employment and Training and the facilitation of construction work placements during the construction phase of the development
  - Compliance with the Code of Local Procurement
  - Compliance with the Code of Practice for Construction Sites and payment of a monitoring fee

- Submission of a Full Travel Plan and relevant updates on progress
- Management agreement for vehicle servicing, deliveries and refuse collection
- Submission of a community access and management plan
- Council's legal fees in preparing the S106 and officer's fees for the monitoring and implementation of the S106

# **Community Infrastructure Levy**

- A2.3.1 The Community Infrastructure Levy (CIL) is a new mechanism for securing funding from development for infrastructure to support the development of the area.
- A2.3.2 The Council adopted its CIL Charging Schedule on 1 September 2014. Islington's CIL applies to all developments granted planning permission on or after that date. CIL is replacing the use of Section 106 agreements for securing development funding for many types of infrastructure. In general, S106 agreements will continue to be used after the adoption of CIL to address other policy requirements such as the delivery of affordable housing and other site specific issues.
- A2.3.3 The Council is also the Collecting Authority for the Mayor of London's CIL for developments in Islington and this will be used to fund the delivery of Crossrail. The Mayoral CIL applies to developments granted planning permission on or after 1st April 2012. The operation of the Mayor of London's CIL and Islington's CIL is determined by the Planning Act 2008 (as amended) and the Community Infrastructure Levy Regulations 2010 (as amended).