

2 Waterhouse Square, London EC1N 2ST

On behalf of: Prudential Assurance Company Limited

November 2023





Town Planning Statement

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1 Executive Summary


- 1.1 This Town Planning Statement is submitted on behalf of Prudential Assurance Company Limited (the “Applicant”) in support of an application for full planning permission and listed building consent for the refurbishment and extension of 2 Waterhouse Square, London, EC1N 2ST.
- 1.2 The Applicant has appointed CO-RE to bring forward and manage the development on their behalf, alongside Orms Architects as lead designers with a full design team to deliver the proposals.
- 1.3 The Proposed Development seeks to sensitively refurbish and extend the existing building to provide high quality commercial floorspace (Class E). The proposals seek to enhance the existing building, reinstate the historic courtyard and repair the historic fabric of the Site. The proposals will enhance the Grade II* listed building and positively contribute to the Hatton Garden Conservation Area and local townscape.
- 1.4 “We Make Camden” is the Council’s updated vision for the Borough centred around six key ambitions:-
- 1) Camden is a borough where every child has the best start in life;
 - 2) Camden’s local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life;
 - 3) Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute;
 - 4) Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well;
 - 5) Everyone in Camden should have a place they call home; and
 - 6) Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.

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- 1.5 It is considered that the Proposed Development aligns with these ambitions by providing high-quality commercial floorspace within Camden, contributing positively to the community and the local area.
- 1.6 The Applicant and design team have engaged thoroughly with Camden’s Officers, other key stakeholders and the local community to inform the final design of the Proposed Development.
- 1.7 This Town Planning Statement provides an assessment of the Proposed Development (as defined in paragraph 2.6 below) in planning terms in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires planning applications to be determined in accordance with the Development Plan unless material considerations dictate otherwise.
- 1.8 The Proposed Development will provide significant public benefits, namely:
- The delivery of a high-quality architectural design, which responds to the local context and surrounding character and improves public access throughout the Site;
 - Enhance, utilise and ensure the longevity of a Grade II* listed building within the Hatton Garden Conservation Area;
 - The delivery of an energy efficient and sustainable development to address climate change pressures, including a commitment to achieve a BREEAM Excellent rating;
 - Maximising local recruitment both during construction and on completion of the development, including apprentices and training opportunities; and
 - Secure cycle parking throughout the development to encourage sustainable travel.
- 1.9 It is considered that the Proposed Development fully complies with the development plan and meets the objectives and aspirations for Camden and the Applicant. On this basis, we consider that planning permission should be granted.

2 Introduction

- 2.1 This Town Planning Statement has been prepared by Gerald Eve LLP on behalf of the Applicant, in support of an application for full planning permission and listed building consent for the refurbishment and extension to the existing office floorspace, providing of 29,853sqm (GIA) of commercial use (Class E) at 2 Waterhouse Square, London, EC1N 2ST (herein referred to as the “Site”).
- 2.2 The Applicant has appointed CO-RE to bring forward and manage the development on their behalf. CO-RE are central London developers with a commitment to delivering high quality design and value.
- 2.3 The Applicant has a commitment to delivering schemes of exceptional design quality (both internally and externally), with an occupier focus on wellbeing and sustainability that ultimately make a positive contribution to the vibrancy and vitality of London as the economic heart of the UK.
- 2.4 The Applicant has appointed Orms Designers and Architects, alongside a full project team to bring forward the proposals at the Site. The works are summarised in Section 6 of this Statement as well as in the accompanying Design and Access Statement.
- 2.5 In summary, the proposals include the refurbishment of the existing office floorspace, and the provision of 29,853 sqm of commercial floorspace (Class E) across the basement to the sixth floor. The refurbishment will include the demolition of the existing circular atrium in order to reinstate the historic courtyard and repair the historic fabric of the Site. External alterations for new facades and a glazed roof are proposed, with entrances and servicing being reconfigured. Cycle parking provision will be provided at the ground and lower ground floor.
- 2.6 Accordingly, full planning permission and listed building consent is sought for (herein referred to as the “Proposed Development”) the following:

“Refurbishment and extension of the existing building at 2 Waterhouse Square comprising the delivery of new Class E (commercial) floorspace, external alterations, reconfiguration of




entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.”

2.7 This Statement should be read in conjunction with the submitted plans and drawings as well as the following documents which are submitted in support of the planning and listed building consent applications:

- Completed Application Form (ref. PP-12288493), prepared by Gerald Eve LLP;
- Covering Letter, prepared by Gerald Eve LLP;
- Completed Ownership Certificate A;
- Additional CIL Information Form, prepared by Gerald Eve LLP;
- Town Planning Statement, prepared by Gerald Eve LLP including, draft Section 106 Heads of Terms;
- Site Location Plan, prepared by Orms;
- Existing Plans, Elevations and Sections, prepared by Orms;
- Proposed Plans, Elevations and Sections, prepared by Orms;
- Area Schedule, prepared by Orms;
- Drawing Schedule, prepared by Orms;
- Design and Access Statement (including Townscape Assessment), prepared by Orms;
- Acoustic Report, prepared by Hoare Lea;
- Sustainability Statement, prepared by Hoare Lea;
- Daylight and Sunlight Assessment, prepared by Point 2 Surveyors;
- Energy Statement, prepared by Hoare Lea;
- Construction Management Plan, prepared by Velocity;
- Transport Assessment (including delivery and servicing), prepared by Velocity;
- Heritage Statement prepared by KM Heritage; and
- Statement of Community Involvement, prepared by London Communications Agency.

2.8 This Statement provides an assessment of the Proposed Development against the relevant national, regional and local planning policy framework for the Site. It is structured as follows:


- A description of the Site and its Surroundings at Section 3;

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- A summary of the Planning History at Section 4;
 - A summary of the pre-application engagement with the London Borough of Camden and consultation with other stakeholders at Section 5;
 - A description of the Proposed Development in detail at Section 6;
 - A summary of the adopted and emerging Planning Policy Framework at Section 7;
 - An assessment of the land use considerations at Section 8;
 - An assessment of the design, bulk and massing considerations at Section 9;
 - An assessment of the historic environment and townscape considerations at Section 10
 - An assessment of the energy, sustainability and landscaping considerations at Section 11;
 - An assessment of the transport, noise, air quality and amenity considerations at Section 12;
 - A summary of Planning Obligations (including draft Heads of Terms) and the Community Infrastructure Levy arising from the Proposed Development at Section 13; and
 - Summary and Conclusions at Section 14.

2.9 The Applicant proactively entered into a Planning Performance Agreement (“PPA”) with Camden, and the Proposed Development has evolved through a series of pre-application meetings with Camden Council dating from October 2022, concentrating on topics such as design, heritage and townscape, energy and sustainability and transport.

2.10 The proposals were presented to Camden’s Design Review Panel on 9 June 2023 for scrutiny. The proposals have developed iteratively in direct response to Officer and DRP feedback.

2.11 The Applicant has also undertaken consultation with the local community, business groups, ward councillors, Camden Markets Team and community groups. The feedback received has resulted in design changes. Details of this engagement are included within the Statement of Community Involvement, prepared by London Communications Agency and summarised at Section 5 of this Statement.

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- 2.12 The Applicant has sought to maintain a clear and open dialogue with the community throughout the design phase to discuss the plans and receive their feedback, to ensure the plans benefit the community and the wider area.
- 2.13 This Statement provides a comprehensive review of national, regional and local planning policy and guidance relevant to the proposals. It assesses the degree to which the proposals accord with policies of the Development Plan and takes other material considerations into account, in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory tests.
- 2.14 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.15 The Proposed Development delivers social, environmental and economic public benefits which include but are not limited to; the optimisation of land to maximise floorspace, introduction of high-quality office floorspace, delivering high-quality commercial space, the introduction of green and blue roofs and solar PV panels and the introduction of cycle parking and associated end of trip facilities ensuring a more sustainable building, the delivery of a high-quality architectural design which responds to the local context and surrounding character and improves public access throughout the Site, altogether, enhancing and ensuring the longevity of a Grade II* listed building within the Hatton Garden Conservation Area.
- 2.16 Accordingly, as set out in detail in this Statement, it is considered that the Proposed Development is in accordance with the Development Plan, and as such the Application should be granted planning permission accordingly.

3 Site and Surroundings

3.1 This section describes the Site's location and context in greater detail. It is described further in the Design and Access Statement, prepared by Orms.

The Site

3.2 Waterhouse Square is located at 138-142 Holborn however the specific unit that applies to this application Site is 2 Waterhouse Square only.

3.3 The Site is located to the north of Holborn (A40) bound by Brooke Street to the west, Leather Lane to the east, Beauchamp Street to the north and Holborn to the South.

3.4 The Site forms part of the Grade II* listed 'Prudential Assurance Building, 142 Holborn Bars', as identified within the Historic England list description. The Site is also located within the Hatton Garden Conservation Area.

3.5 The Site, in contrast to other parts of the former Prudential Assurance Building, consists largely of a substantial, late 1980s to early 1990s office building. This was attached to the rear of the former Prudential building which was developed over the period between 1885 and 1932.

3.6 There is a generous footpath to the south of the Site along Holborn responding to the busy street environment. In contrast Brooke Street is a quiet side street with limited vehicular or pedestrian traffic, similarly Leather Lane has limited vehicular access, and has pedestrian access leading to the Leather Lane market.

3.7 The Site has the following planning policy designations in accordance with the Camden Local Plan Policy Proposals Map (adopted July 2017 and most recently updated in January 2021):

- Holborn Growth Area;
- Central London Area;
- Blackheath Point to St Paul's Cathedral LVMF;
- Greenwich Park Wolfe statue to St Paul's Cathedral LVMF;
- Primrose Hill Summit to St Paul's Cathedral LVMF;
- Archaeological Priority Area; and

- Hatton Garden Conservation Area.

3.8 The Site has an excellent Public Transport Accessibility Level ('PTAL') with the highest rating of PTAL 6b. Chancery Lane underground station is located less than 100m to the west of the Site at the junction with Gray's Inn Road. Farringdon underground and overground station is located within 500m of the Site, serving the Elizabeth, Central, Circle, Hammersmith & City and Metropolitan line. There are also a number of nearby bus routes and networks that surround the Site.

3.9 The total site area within the application boundary is 4,113 sqm and is shown on the submitted Site Location Plan, prepared by Orms.

Surrounding Area


3.10 The surrounding area is predominantly commercial office and retail properties, characterised with a mix of contemporary and periodic historic architectural styles reflecting the Hatton Garden Conservation Area and the nearby Bloomsbury Conservation Area.

3.11 Immediately to the east of the Site is Vesage Court, a fourteen-storey residential complex and numerous retail units in more modern style with large tinted glazed facades.

3.12 The surrounding area is populated by traditional perimeter style blocks accommodating individual or a series of courtyards within the building envelope. This arrangement results in heavy solid massing presenting the blocks prominence along the key access routes. Most of these courtyards are hard surfaces with limited green space in the area other than Gray's Inn Gardens and Bourne Estate, both to the northwest of the Site.


3.13 The Site falls within Camden's Knowledge Quarter Innovation District designated in the Draft Site Allocations DPD. The Knowledge Quarter is one of the densest concentrations of scientific and knowledge-based organisations anywhere in the world, creating an incubator for the UK. Over recent years, the Knowledge Quarter has seen the introduction of key occupiers such as The Francis Crick Institute, Google, The Wellcome Trust, amongst many others.

3.14 There are a number of Listed Buildings within the surrounding area. These are outlined below:

- 
- St Albans Clergy House and attached railings with lamp holder (Grade II);
 - Church of St Alban the Martyr (Grade II*)
 - Obelisk marking city boundary on north side of roadway (Grade II);
 - Royal Fusiliers war memorial (Grade II*);
 - 1-4 Holborn bars (Grade I);
 - 4-6 Holborn bar and attached pump (Grade I);
 - 337 and 338 High Holborn (Grade II*);
 - Staple Inn Buildings and attached railings (Grade II);
 - The institute of Actuaries and attached railings (Grade II);
 - The hall and attached railings, Staple Inn (Grade II); and
 - Mercer’s school hall and adjoining buildings (Grade II*).

4 Planning History

- 4.1 Waterhouse Square is located at 138-142 Holborn however the specific unit that applies to this application Site is 2 Waterhouse Square only. An examination of Camden's planning register has been undertaken; the planning history presented below relates only to the immediate application site. All relevant planning history to the wider site of Waterhouse Square buildings is included at appendix A.
- 4.2 On 28 February 1996 listed building consent (ref. 9570384) was granted for the internal alterations to partitions, doors and stairways.
- 4.3 On 18 January 2007 planning permission (ref. 2006/5392/P) was granted for the change of use from retail use (Class A1) to office use (Class B1). This planning permission was granted renewal on 15 January 2010.
- 4.4 On 25 June 2010, planning permission and listed building consent (refs. 2010/2347/P and 2010/2371/L) was granted for the following:
- “External alterations including the replacement of shopfronts by new window openings to the east elevation at ground floor level and installation of new main entrance doors, frameless lobby and associated alterations to southern elevation on inner courtyard of office (B1).”**
- 4.5 On 15 December 2011, planning permission and listed building consent (refs. 2011/5218/P and 2011/5219/L) was granted for the installation of seats and planters to the external courtyards of offices.
- 4.6 On 18 September 2012, listed building consent (ref. 2012/3633/L) was granted for the following:
- “Internal alterations to include the insertion of partition walls, new flooring and lighting alterations at first and second floor level of existing offices (Class B1a).”**
- 4.7 On 1 July 2014, planning permission and listed building consent (refs. 2014/1685/P and 2014/1715/L) was refused for the following:



“Change of use of ground floor space from office (Class B1) to cafe (Class A3). Installation of new entrance doors, double glazed windows and associated internal alterations.”

- 4.8 On 7 March 2023, a Certificate of lawfulness for a proposed use (refs. 2023/0985/P and 2023/1167/L) was applied for for the infill of existing atria to provide additional office space at 2 Waterhouse Square. The applications are currently pending determination.
- 4.9 On 29 June 2023, planning permission and listed building consent (refs. 2023/1376/P and 2023/1807/L) was granted for the erection of single storey rooftop plant enclosure at 3 Waterhouse Square.



5 Pre-Application Consultation

- 5.1 This section summarises the outcome of the pre-application and consultation process and how the Proposed Development scheme has responded to comments received.
- 5.2 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 5.3 In respect of pre-application engagement, paragraph 39-43 of the National Planning Policy Framework highlights the important of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.
- 5.4 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and the more issues that can be resolved at pre-application stage, the greater the benefit.

Community Consultation and Engagement

- 5.5 London Communications Agency have undertaken a programme of consultation which is detailed in full in the submitted Statement of Community Involvement.
- 5.6 A consultation website launched on 31 March 2023, with key stakeholders contacted directly in March 2023 prior to the start of formal consultation. Letters were sent to 4,882 addresses in the local area inviting neighbours to comment on the proposals. An advertisement was placed in the Camden New Journal on 7 and 14 April 2023.
- 5.7 A public consultation event was held on 26 April 2023 at St Alban the Martyr, Brooke Street, with a preview of the event for market traders from the Leather Lane market held prior to the public event.
- 5.8 Feedback was largely positive, with attendees focussing on minimising construction impacts, and welcomed new commercial area which would further support the market and market traders.



London Borough of Camden

5.9 The Proposed Development has evolved through a series of pre-application meetings with Officers of the London Borough of Camden between October 2022 and July 2023. The Applicant entered into a Planning Performance Agreement with Camden. Workshops and formal meetings were held in relation to design, heritage and townscape, energy and sustainability and transport matters.

5.10 The key feedback that has been received is briefly summarised as follows:


- The approach to the architectural design is very positive and works within the Hatton Garden Conservation Area;
- The extension to the building appears comfortable;
- The sustainability aspirations of the project are supported;
- The retention of all perimeter structure is welcomed;
- The use of the commercial space at the ground floor must be considered carefully and be supported by local stakeholders and residents;
- Minimising construction impacts for local residents must be carefully considered; and
- A low amount of less than substantial harm would occur to designated heritage assets that need to be outweighed by public benefits.

5.11 The proposals have developed iteratively in direct response to Officer feedback, further detail on the design development of the proposals can be found in the Design and Access Statement prepared by Orms.

Design Review Panel

5.12 The proposals were scrutinised by Camden’s Design Review Panel (“DRP”) on 9 June 2023 and the written report was issued on 30 June 2023.

5.13 The DRP generally welcomed the proposals, specifically noting that the proposals were sympathetic to the listed building. The reinstatement of the historic courtyard and reworking of the facades were seen as benefits of the scheme. The DRP also supported the reduction in height of the atrium. The DRP made some recommendations for the design to be improved



and refined. This Design and Access Statement, prepared by Orms Architects summarises the key responses.

- 5.14 The pre-application process has been iterative, with Officer feedback informing the Proposed Development which has been refined as a result of this engagement.

Other Consultees

- 5.15 The Applicant and design team have reviewed the proposals with the Camden Markets team, Central District Alliance, Camden Cyclists and ward councillors.
- 5.16 The Applicant has sought to maintain a clear and open dialogue with the community throughout the design phase to discuss the plans and receive their feedback, to ensure the plans benefit the community and the wider area.
- 5.17 The Applicant has proactively worked with Camden Officers, statutory consultees and key stakeholders in the development of these proposals in line with the National Planning Policy Framework and the Localism Act 2011.

6 Proposed Development

- 6.1 This section should be read in conjunction with the Design and Access Statement which has been prepared by Orms Architects. It contains a full description of the Proposed Development and the rationale for its design, scale, layout, access and materiality.
- 6.2 For the avoidance of doubt, full planning permission and listed building consent is sought for:
- Refurbishment and extension of the existing building at 2 Waterhouse Square comprising the delivery of Class E (commercial) floorspace and a flexible commercial (Class E) and bar (sui generis) unit, external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.**
- 6.3 The Applicant's vision for the Site is to retain as much of the existing structure as possible, while revitalising the existing building to meet changing office demands and provide a more sustainable building, in addition to delivering high quality public realm within the Square.
- 6.4 The Proposed Development is summarised as follows:
- Retain where possible the existing structure of the building and as much of the existing material as possible;
 - Remove the glass roof structure. Internally, the existing atrium will be removed to enable the historic courtyard to be reinstated. A new glazed roof will be installed above the courtyard;
 - Recladding the existing building fronting Brookes Street and Greville Street;
 - A new architecture for the north building;
 - Create a new infill bridge; and
 - Internally, the proposal seeks to refurbish the existing commercial accommodation, which is almost completely modern fabric. The overall refurbishment has been designed to respond to the historic significance of the building.
- 6.5 Table 1 below summarises the floor areas of the existing building and the Proposed Development on the basis of gross internal area.

Table 1: Gross Internal Area

Floor	Existing sqm	Proposed sqm	Change sqm
Basement	3033	3033	/
Lower ground	3091	3601	+510
Ground	4186	3846	-338
First	3792	3657	-135
Second	3847	3875	+28
Third	3843	3854	+11
Fourth	3697	3659	-38
Fifth	3144	3048	-96
Sixth	592	1256	+664
Total	29226	29853	+627

- 6.6 Table 2 below summarises the floor areas of the existing and the Proposed Development on the basis of gross external area.

Table 2: Gross External Area

Floor	Existing sqm	Proposed sqm	Change sqm
Basement	3089	3089	/
Lower ground	3209	3692	+483
Ground	4381	4105	-276
First	4001	3909	-92
Second	4035	4127	+92
Third	4026	4111	+85
Fourth	3837	3929	+92
Fifth	3299	3354	+55
Sixth	663	1397	+734
Total	30540	31713	+1,193

- 6.7 The predominant use of the Site will remain within an office use with some active commercial uses and a flexible commercial/bar use provided at ground floor.



Bulk, Height and Massing


- 6.8 The massing and architectural expression of the north building has been developed from analysis of the Hatton Garden Conservation Area. The key features which have informed the façade works are the plot widths, chimneys and gables, sculpted form, plinth expression, window pattern and definitive corners.
- 6.9 The approach to the massing has been derived from the need to retain as much of the existing structural frame as possible. Approximately 30% of the structure would be demolished to allow for reconfiguration of the existing floors.
- 6.10 A new façade treatment is proposed on the north building which will give the building an entirely new appearance more sympathetic to its surroundings.

Façade and Materiality

- 6.11 The new facades proposed on the northern building better respond to Hatton Garden Conservation Area and the surrounding Brooke's Market. These facades will be high quality masonry facing material, with a simpler and ordered relief and detail.
- 6.12 The new facade materials have been selected to sit more comfortably with the surrounding brick buildings of Brooke's Market and the wider conservation area, whilst also being complementary to the historic terracotta facades of the Waterhouse Estate. Where possible, the existing pink granite will be re-used either on-site or off-site. This is being explored in further detail.

Energy, Sustainability and Urban Greening

- 6.13 Sustainability is a key aspect of the Proposed Development in all manners, not only in terms of BREEAM and life-time carbon reduction but in its operational phase in terms of health and wellbeing. The Proposed Development would be highly sustainable with central plant equipment relocated to 3 Waterhouse Square. The Energy Strategy for the building proposes an all-electric solution with no gas or CHP boilers to minimise greenhouse gas emissions. Low-



zero carbon technologies such as an Air Source Heat Pump are proposed with photovoltaic panels at roof level.

6.14 The submitted Sustainability Statement, prepared by Hoare Lea sets out that the Proposed Development is set to achieve an overall 35% reduction in carbon dioxide emissions over Part L 2021 using SAP 10 carbon factors.

6.15 A BREEAM pre-assessment has been prepared by Hoare Lea and is found in Appendix A of the Sustainability Statement. It concludes that the development will achieve a minimum score of 80.21% 'Excellent' for the proposals.

6.16 The sustainability considerations are discussed in detail at section 11 of this statement.

Cycle Parking

6.17 The Proposed Development would provide 422 long-stay cycle parking spaces. These would be provided at lower ground level and can also be accessed via two cycle lifts and two sets of shallow stairs with wheeling ramps (four ramps in total).

6.18 Associated facilities including changing rooms, showers, lockers, and drying rooms are proposed at the basement level directly below the cycle store, accessed via stairs and lifts.


6.19 A total of 35 short-stay cycle parking spaces will be provided. 16 of the spaces would be provided for the office at ground floor level. It is not possible to accommodate the remaining 19 spaces within the site boundary. It is therefore proposed to utilise the public highway on Brooke's Market or Beauchamp Street. The location of these spaces will be agreed with LB Camden and secured through a legal agreement.

7 Planning Policy Framework

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 7.2 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:
- The London Plan, published in March 2021; and
 - The Camden Local Plan, adopted in July 2017.
- 7.3 The National Planning Policy Framework, published in July 2021, Planning Practice Guidance (“PPG”) and Camden Planning Guidance are material considerations.

National Planning Policy Framework and Guidance

- 7.4 The Ministry of Housing, Communities and Local Government (now the Department for Levelling-up Housing and Communities “DLUHC”) published the revised National Planning Policy Framework (“NPPF”) in July 2021.
- 7.5 The NPPF sets out the Government’s economic, environmental and social planning policies for England. It summarises, in a single document, all previous national planning policy advice. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.6 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The NPPF explains that the policies of the Framework, taken as a whole, constitute what the Government considers sustainable development to mean in practice.
- 7.7 The presumption in favour of sustainable development in the new policy guidance is designed to ensure that the planning system as a whole focuses on opportunities. The presumption, in



practice, means that significant weight should be placed on the need to support economic growth and housing delivery through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles of sustainability in the Framework.

- 7.8 The NPPF makes clear that the policies should apply unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (paragraph 49). Specifically, paragraph 19 states that the planning system should do all that it can to promote sustainable economic growth in order to create jobs and homes to meet the challenges of global competition alongside a low carbon future. The NPPF states that significant weight should be placed on the need to support economic growth and housing delivery through the planning system.
- 7.9 The PPG is an online resource which is maintained by the DLUHC and is regularly updated. It provides guidance relating to a number of planning matters, the Conserving and Enhancing the Historic Environment PPG is considered relevant to the Proposed Development.
- 7.10 On 22 December 2022, DLUHC consulted on reforms to national planning policy being considered as part of the Levelling Up and Regeneration Bill. The consultation concluded on 02 March 2023 and included a revised NPPF which proposes changes to plan making, housing delivery and targets and the role of density and the presumption in favour of sustainable development. It also sought views on future changes to plan-making, decision making and aspirations for national development management policies that would not come forward immediately.
- 7.11 On Monday 24 April 2023, the Rt Hon Rachel Maclean, Minister of State for Housing and Planning confirmed at the Levelling Up, Housing and Communities Select Committee that the Government had received over 26,000 consultation responses which were still being considered and could not commit to a timeframe for the publication of the revised NPPF.

The London Plan

- 7.12 The London Plan is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London.
- 7.13 The London Plan is centred around 'Good Growth', with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The Plan recognises the key role of Central London as a driver for London and the wider UK economy with the Central Activities Zone (CAZ) being critical in supporting growth.
- 7.14 The London Plan places great emphasis on sustainable development for major applications, especially those that are referable to the Mayor. This includes maximising energy efficiency, carbon offsetting and assessment of the whole life carbon implications of demolition to be considered.

Other Greater London Authority ("GLA") Guidance

- 7.15 The following GLA London Planning Guidance ("LPG") are also considered to be material to the determination of this application:-
- Accessible London (2014);
 - Planning for Equality and Diversity (2007);
 - Character and Context (2014);
 - Public London Charter (2021);
 - Energy Planning Guidance (2020);
 - Be Seen energy monitoring (2021);
 - The control of dust and emissions in construction (2014);
 - Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (2019);
 - The Mayor's Transport Strategy (2018) ;
 - Whole Life Carbon (2022);
 - Good Quality Homes For all Londoners (2021);
 - Housing (2016);

- Shaping Neighbourhoods: character and Context (2014);
- Sustainable Transport, Walking and Cycling Guidance (2022);
- Air Quality Neutral (2023);
- Air Quality Positive (2023); and
- Urban Greening Factor (2023).

7.16 In addition, the draft Fire Safety London Planning Guidance document (2021) will also be considered in the preparation and assessment of the proposals.

Local Planning Policy

7.17 The Camden Local Plan was adopted in July 2017 and sets out how development will be managed within the borough. The Plan seeks to address a number of challenges; adapting to Camden’s growing population and to social change, the supply and cost of housing in the borough, maintaining a successful economy and improving opportunities, inequalities, health and wellbeing, improving transport, quality of the environment and crime and safety.

7.18 To address these challenges, the Plan sets three key objectives:-

- 1) Developing new solutions with partners to reduce inequality and improve health and wellbeing;
- 2) Creating conditions for and harnessing the benefits of economic growth; and
- 3) Investing in our communities to ensure sustainable neighbourhoods.

7.19 The Council’s objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. The Plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

7.20 Camden Planning Guidance (“CPG”) provides further detailed guidance in assessing development in the Borough. Those considered in the preparation and assessment of the proposals include:

- Access for All CPG (2019)

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- Air Quality (2021)
 - Amenity (2021)
 - Biodiversity (2018)
 - Design (2021)
 - Developer Contribution CPG (2019)
 - Employment sites and business premises (2021)
 - Energy efficiency and adaptation (2021)
 - Housing (2021)
 - Planning for health and wellbeing (2021)
 - Transport (2021)

Emerging Local Planning Policy

7.21 Camden Council have now commenced a review of their Local Plan.

7.22 Camden first consulted on their draft Site Allocations Local Plan ('SALP') between 13 February and 27 March 2020. A second round of consultation was undertaken between 30 November 2021 and 24 January 2022 to reflect national, regional and neighbourhood level planning law and policy changes.

7.23 A call for sites and issues and options on the Local Plan Review was carried out between 4 November 2022 and 13 January 2023. The responses received as part of this will feed into the preparation of the draft Local Plan that is anticipated to be published for consultation later in 2023.

7.24 Whilst this draft SALP is still at an early stage, and having regard to the three tests set out in Paragraph 48 of the NPPF, currently very limited weight can therefore be applied to the policies within it. The aspirations of the draft SALP, particularly for the Knowledge Quarter, have been taken into account in the assessment of the proposals.

Policy Considerations

7.25 The following sections of this Statement consider the Proposed Development against the following key planning considerations:



- Land Use and Principle of Development;
- Design, Bulk and Massing;
- Historic Environment and Townscape; and
- Energy and Sustainability.


7.26 Other Material Considerations including daylight, sunlight and amenity; ecology and landscaping; transport, car and cycle parking; deliveries, servicing and waste; noise and air quality are also reviewed in detail.

8 Land Use

- 8.1 This section of the statement appraises the Proposed Development against land use policy considerations.

Principle of Development

- 8.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.
- 8.3 Chapter 1 of the new London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.
- 8.4 London Plan Policy GG1 encourages development to seek to ensure changes to the physical environment achieve an overall positive contribution to London.
- 8.5 London Plan Policy GG2(C) sets out that development should proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services infrastructure and amenities by public transport, walking and cycling.
- 8.6 London Plan Policy GG2(D) highlights that proposals should use a design-led approach to determine the optimum development capacity of sites.
- 8.7 London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites.
- 8.8 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the Site, providing a mix of uses in accessible parts of the Borough (including self-contained



housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000 sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the Borough, with Central London playing a key role in facilitating that growth.


- 8.9 Supporting paragraphs 2.7-2.8 in the Local Plan set out that the Council wants to promote and encourage high quality developments with high densities to make the most efficient use of Camden’s land and buildings, particularly in the most accessible parts of the borough. Whilst also seeking to improve the quality of the environment, protect the amenity of occupiers and neighbours and meet other planning objectives.

Assessment

- 8.10 The application proposes a more efficient use of the land, which is consistent with the aims of sustainable development. The Proposed Development seeks to optimise previously developed urban land, which is well served by public transport, registering a PTAL 6b rating.
- 8.11 The Proposed Development would reuse the existing structure and façade to utilise the land more effectively. The proposals will provide the opportunity to increase the density of the Site in accordance with the character of the surrounding area whilst ensuring that the impacts of the development are acceptable in environmental terms. The Proposed Development will incorporate sustainable materials and design, where appropriate, which will result in a more energy efficient building.
- 8.12 The Proposed Development will therefore bring an outdated and inefficient building into use whilst also contributing to the provision of high-quality new commercial floorspace within the Borough in accordance with the NPPF, London Plan Policies GG1, GG2 and D3 and Policy G1 of the Local Plan.


Employment and Office Use

- 8.13 The NPPF sets out the Government’s commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century. Paragraph 81 of the NPPF goes on to state that



significant weight should be given to supporting economic growth and productivity, taking into account local business needs and opportunities for development.

- 8.14 London Plan policy GG5 sets out principles for growing a good economy to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners. London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites. Policy E1 echoes this and makes specific reference to improvements to the quality, flexibility and adaptability of office space. Policy E1(C) of the London Plan is clear that the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market should be supported and promoted.
- 8.15 Policy SD4 of the London Plan states that the unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced.
- 8.16 Chapter two of the Camden Local Plan sets out the Council's spatial strategy for growth. Paragraph 2.52 states that the Council recognises the unique character and challenges of Central London, in particular in balancing its economic, social and cultural role. The Council will support the concentration of educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter.
- 8.17 Policy E1 of the Local Plan supports the provision of a range of business and employment floorspace including the intensification of existing employment sites and direct new office development to the growth areas, Central London and the town centres to meet expected demand of 695,000sqm by 2031.
- 8.18 Policy E2 of the Local Plan reiterates that the Sites which are suitable for continued business use will be protected and the intensification of employment uses will be supported provided they are maintained or increased.
- 8.19 Part f) of Policy E2 sets out that the Council will consider higher intensities of redevelopment of premises or sites that are suitable for continued business provided that the proposed premises includes floorspace suitable for start-ups, small and medium-sized enterprises



(SME), such as managed affordable workspace where viable. Paragraph 5.44 of the Local Plan sets out that affordable SME workspace will be secured through a planning obligation for large scale employment developments with a floorspace of 1,000sqm or more. This is reflected at paragraph 36 of the Employment sites and business premises CPG.


- 8.20 Part g) of policy E2 requires schemes to increase employment opportunities for local residents including training and apprenticeships. Paragraph 63 of the Employment sites and business premises CPG states that developments of over £3 million in build costs will be required to recruit one construction apprentice through Camden Council, or its nominated partner, for every £3 million of build cost where the length of the project allows.

Assessment

- 8.21 The Proposed Development will deliver 29,853sqm (GIA) of high-quality flexible office (Class E) space to a shell and core standard which is supported by planning policy at a regional and local level. The proposed office space has been flexibly designed to cater for future office requirements and has been designed to cater for one or more tenants in the building. The proposal represents an increase in 627 sqm (GIA) of office floorspace. Office floorspace is a key supporting function for Camden's growing Knowledge Quarter and will contribute to the principle of clustering within the CAZ.
- 8.22 As the proposals results in an uplift of 627 sqm of commercial floorspace, the requirement to provide affordable SME workspace is not triggered in accordance with the Local Plan.
- 8.23 The Proposed Development would comply in full with policies GG5, SD4, E1 and D3 of the London Plan and policies E1 and E2 of the Local Plan and the Employment sites and business premises CPG.

Mixed Use Policy and Residential Accommodation

- 8.24 Chapter 5 of the NPPF provides a framework for delivering a sufficient supply of homes by setting out how Local Authorities should assess, and plan for housing need to be met through sufficient land being available to meet housing need.




8.25 Policy SD5 of the London Plan states that new residential development should not compromise the strategic functions of the CAZ. Part C states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development. Part F of the policy states that mixed use residential/office proposals should be supported where there is an equivalent or net increase in office floorspace.

8.26 Policy H1 of the Local Plan sets out that self-contained housing is the priority land use across the Borough.

8.27 Policy H2 of the Local Plan seeks to deliver a balance of residential and non-residential development within Central London. Further guidance is set out within the Housing Camden CPG adopted in January 2021. The policy requires development proposals involving an increase of floorspace greater than 200 sqm GIA in the Central London Area to provide 50% of all additional floorspace as self-contained housing. Where housing is required as part of a mix of uses, the Council will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, they will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

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

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

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


8.29 Where affordable housing cannot practically be provided on site, or offsite provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing offsite in the same area, or exceptionally a payment-in-lieu.

Assessment

8.30 Considering the provision of residential floorspace, in accordance with Policy H2, The Proposed Development would see a total uplift of all uses of 627 sqm (GIA). Under policy H2, this generates a requirement for half of the uplift in floorspace, equating to 313.5 sqm, to be provided as housing as part of a mix of uses, unless the criteria a-j set out in paragraph 8.30 above justify a payment in lieu to fund off site housing.


8.31 The Proposed Development is considered against the criteria within Policy H2 below and it is concluded that provision of residential use on-site should not be required.

8.32 **Part A, the character of the development, the Site and the area** – in terms of character of the development, the proposal is seeking to refurbish the existing office building to provide a more sustainable and efficient commercial building within the Holborn Growth area and Central London location. The Site is an existing office building and it is sought to retain this character by retaining a single commercial use at the building, with the addition of active commercial uses at ground floor. It is felt that this use would help reinforce the character of



the area by intensifying the existing office accommodation within the growth area and complementing the popular Leather Lane Market.

- 8.33 **Part B, site size, and any constraints on developing the Site for a mix of uses** – it is considered that providing any amount of residential floorspace within the building would significantly impact on the ability to deliver quality commercial floorspace. It would reduce the size of office space available and would provide a layout that would impact the connectivity and circulation within the building, interrupting the configuration around the cores. The quality of residential accommodation provided on site would be poor as a result of this. Any housing would also take up a considerable amount of active ground floorspace.
- 8.34 **Part D, whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses** – any residential provision would need to be at the same level as office floorspace. Accordingly, there is the potential for disruption across the uses.
- 8.35 **Part F, the need to add to community safety by providing an active street frontage and natural surveillance** – if a new residential entrance was required, this would impact the active frontage provided at ground floor level and the public realm enhancements provided with the scheme. A residential entrance would be blank, given the need to provide adequate bike and waste storage rooms at ground level.
- 8.36 **Part H, the impact of a mix of uses on the efficiency and overall quantum of development** – the provision of residential floorspace in this location would decrease the commercial floorspace within the Holborn growth area and central London location. A further core would also be needed to facilitate this additional use and would mean that the overall efficiency of the commercial use would reduce. The residential floorspace would also likely be inefficient given the residential requirement would deliver 2 or 3 market residential units which would require their own entrance, core, bike and bin store.
- 8.37 **Part J, whether an alternative approach could better meet the objectives of the Local Plan** – it is considered that a wholly commercial scheme would provide benefits when considered against the following policies:

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- Policy E1 – the additional commercial accommodation would help the council meet its 2031 commercial growth target;
 - Policy CC1 – not providing an additional core would mean that demolition could be kept to a minimum which would have benefits in terms of embodied energy and heritage;
 - Policy TC4 – a new active use would be provided in lieu of a residential entrance.

8.38 The Applicant presented an option for alternative off-site residential close to the Site during pre-application discussions, however, this was not considered to be suitable.

8.39 For the reasons identified above, it is considered that the Proposed Development represents an exceptional circumstance, and it is proposed that a payment in lieu of housing delivery is instead provided in accordance with the cascade at Local Plan Policy H2. The above would also protect the main commercial function of the CAZ, in accordance with London Plan Policy SD5.

9 Design Bulk Massing

- 9.1 This section of the Statement evaluates the design attributes of the Proposed Development against the planning policy requirements and standards as well as considering the heritage and townscape impacts.
- 9.2 This section contains a brief overview of the relevant legislation and the planning policy context particularly relevant to the design and massing of the Proposed Development.

Planning Policy Context

- 9.3 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 126 states that the creation of high quality beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 9.4 Paragraph 130 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the Site, and create places that are safe.
- 9.5 At paragraph 132, the NPPF states that design quality should be considered throughout the evolution and assessment of a scheme. It encourages early discussion between the applicant, LPA and local community; ensuring commercial and local interests are aligned.
- 9.6 Planning Practice Guidance Design: process and tools, which supports section 12 of the NPPF, states that LPAs are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area.



London Plan

- 9.7 London Plan Policy GG1 seeks to ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- 9.8 London Plan Policy D1 seeks to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape and to establish optimised site capacities for site allocations.
- 9.9 This policy goes on to note that development should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.
- 9.10 Policy D3 requires development to make the best use of land by following a design-led approach that optimises the capacity of sites, ensuring that development is the most appropriate form and land use for a site.
- “The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity”
- 9.11 Policy D4 states that the design of development proposals should be thoroughly scrutinised. The scrutiny of a Proposed Development’s design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issues.
- 9.12 London Plan Policy D5 Inclusive Design requires development proposals to achieve the highest standards of accessible and inclusive design. Design and access statements for development proposals should include an inclusive design statement. When dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design at an early stage.





Camden Local Plan

- 9.13 Policy C6 of the Local Plan seeks to promote access for all by expecting all buildings and places to meet the highest standards of accessibility and inclusive design.
- 9.14 Further detailed design guidance is set out within the Design CPG published in March 2019.
- 9.15 It is not considered that the building would be classified as a “tall building” in line with paragraph 7.35 of the Local Plan for the purposes of design assessment and therefore policy D9 of the London Plan is not considered.

Assessment

- 9.16 The Proposed Development has been designed by Orms Architects to an exemplary standard and architectural detail with careful and appropriate consideration for its surroundings.
- 9.17 The Site sits within the Hatton Garden Conservation Area and is considered to be a neutral contributor to the Conservation Area, with the proposed works taking inspiration from the surrounding characteristics of the Conservation Area.
- 9.18 The architectural proposals involve a number of key elements:
- Retain where possible the existing structure of the building and as much of the existing material as possible.
 - Remove the glass roof structure and move plant to building no.3. Internally, the existing atrium will be removed to enable the historic courtyard to be removed. A new glazed roof will be installed above the courtyard.
 - Recladding the existing building fronting Brookes Street and Greville Street.
 - North architecture for the north building
 - Create a new infill bridge.
 - Internally, the proposal seeks to refurbish the existing commercial accommodation, which is almost completely modern fabric. The overall refurbishment has been designed to respond to the historic significance of the building.

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- 9.19 The Design and Access Statement, prepared by Orms includes a detailed appraisal of the immediate context to the Site and the wider conservation area. It is demonstrated that the Holborn area is characterised by bookends and gable ends. In contrast, the Brookes Market façade creates a negative drop in the main shoulder between two such bookends. This interrupts the horizontal language by aligning with the top line of mansards. Vertically, the Site incorporates a range of typologies and elements.
- 9.20 Within the wider context, the Conservation Area is characterised by features which have informed the façade works namely the plot widths, chimneys and gables, sculpted form, plinth expression, window pattern and definitive corners.
- 9.21 The Proposed Development seeks to respond to the overall bulk and massing of the surrounding townscape and takes consideration of the context within this part of the Conservation Area. The key element of the physical works to the Site is the restructuring and cladding of the Leather Lane façade and Greville Street elevations.
- 9.22 The approach to the massing has also been derived from the need to retain as much of the existing structural frame as possible, whilst also giving consideration to the varying townscape contexts. Approximately 30% of the structure would be demolished to allow for the reconfiguring of the existing floors, introduction of new cores and a lightweight extension with a new façade treatment giving the building an improved appearance that is more sympathetic to its surroundings.
- 9.23 In terms of appearance, the Proposed Development presents an opportunity to completely renew and refresh the appearance of the modern facades on the north building and make it more sympathetic to its surroundings. The individual elements of the new façade are described and illustrated clearly within the accompanying Design and Access Statement. The new facade materials have been selected to sit more comfortably with the surrounding brick buildings of Brooke’s Market and the wider conservation area, whilst also being complementary to the historic terracotta facades of the Waterhouse Estate. It is also the aspiration to re-use some of the pink granite (where possible to do so) and this is being explored in further detail.


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- 9.24 The Proposed Development would provide level access to all uses into the building through the undercroft from Waterhouse Square. Ramps are proposed within the external courtyard to facilitate access for all users.
- 9.25 It is considered that the Proposed Development would secure the delivery of a high-quality building that respects and positively responds to the local context and character of the Conservation Area. The building has been designed to be highly sustainable and provide an active ground floor commercial frontage to design out crime and antisocial behaviour. The Proposed Development will refurbish the existing building and would contribute to extending its operational lifetime.
- 9.26 It is considered the Proposed Development would provide an exemplary and highly sustainable design in a prominent location allocated for growth and change. The proposals have also been considered by Camden’s Design Review Panel. The proposals therefore fully comply with the NPPF, London Plan Policies D1, D3-D5, Local Plan policy C1 and C6 and the Design CPG.

10 Historic Environment and Townscape

- 10.1 This section considers the Proposed Development against relevant national, regional and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This section also considers the Proposed Development in respect of townscape views and impact heritage assets, notably the Grade II* Waterhouse Square and its setting, as well as the surround heritage assets and their settings.
- 10.2 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the submitted Heritage Statement prepared by KM Heritage and submitted as part of the application and should be read alongside this Section of this Statement.

Legislation

- 10.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 10.5 The need to apply this test was reiterated by the Court of Appeal in the case of *Catesby Estates Ltd v Steer and Secretary of State for Communities and Local Government v Steer* [2018] EWCA 1697 sets out three general principles to be applied when considering the setting of a Listed Building. The Judgement sets out at paragraphs 28 to 30, inter alia that:
- 1) It is necessary for the decision maker to understand what the setting of a listed building encompasses even if its extent is difficult to delineate exactly, and whether the Proposed Development is within the setting, or related to it in some way; and



2) There is no single approach to identify the extent of a listed building's setting and how one experiences a listed building within its changing surroundings are not limited only to sight.

10.6 The Judgement is clear that the setting of a Listed Building is not limited to how one visually experiences a heritage asset through sense of sight; in judging the impact development may have on the significance of a Listed Building and its setting, regard should be given to its physical surroundings and how that informs the relevant "experience" of that heritage asset.


10.7 The Government has attached great importance to conserving and enhancing the historic environment at Chapter 16 of the NPPF.


10.8 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

10.9 As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

10.10 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

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- 10.11 Paragraph 199 states that, when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 10.12 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.13 The NPPG on Conserving and Enhancing the Historic Environment provides further guidance in assessing the impact of development proposals which affect heritage assets. It sets out that "significance" derives not only from a heritage asset's physical presence, but also from its setting. It sets out that "Public Benefits" may follow from many developments and could be anything that delivers economic, social, or environmental objectives as described at Paragraph 8 of the NPPF.
- 10.14 Paragraph 20 of the PPG acknowledges that the public benefits which flow from a development can be anything that delivers economic, social or environmental progress. The benefits should flow from the proposals and be of a nature and scale to be of benefit to the public interest at large and should not just be a private benefit. However, benefits do not have to be visible or accessible to the public in order to constitute public benefits.
- 10.15 Paragraph 206 of the NPPF states that 'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.
- 10.16 The PPG on Conserving and enhancing the historic environment supports section 16 of the NPPF. Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the



potential effect and acceptability of development proposals. Significance derives not only from a heritage asset's physical presence, but also from its setting therefore a thorough assessment of the effect on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

London Plan

- 10.17 The policy in the London Plan states in HC1(C) that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. In turn, development proposals should avoid harm and identify enhancement opportunities encouraging heritage considerations early in the design process.
- 10.18 London Plan Policy HC1(D) makes it clear that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 10.19 London Plan Policy HC3, in relation to strategic and local views, notes that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Supporting paragraph 7.3.1 continues by saying development can make a positive contribution to the views and this should be encouraged, but where development is likely to compromise the setting or visibility of a key landmark it should be resisted.
- 10.20 This policy goes on in HC4, noting development proposals should not harm, and should seek to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and where possible enhance views.



Local Plan

10.21 Policy D2 of the Local Plan states that the Council will preserve and where appropriate, enhance Camden's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.

Heritage Impact

10.22 The Heritage statement, prepared by KM Heritage concludes that there is no harm caused to the Site as a Grade II* listed building, the Hatton Garden Conservation Area, nearby listed buildings and locally listed buildings in the surrounding area. The proposals are considered to respond positively to the established historic context by replacing a generic building with one that has better integrated into the listed building. The Proposed Development is demonstrated to comply with Paragraph 199 of the NPPF in that it conserves the special architectural or historic interest and no harm to heritage significance is caused. Paragraphs 200, 201 and 202 of the National Planning Policy Framework are therefore not engaged in consideration of the proposed works. Paragraph 203 is not relevant in this instance. The proposal is therefore shown to comply with relevant policies within the Development Plan.

10.23 In the event that the decision makers take a different view, it is considered that the public benefits flowing from the development are significant and in line with paragraph 202 of the NPPF, where the level of harm is assessed to be of less than substantial harm, this harm should be outweighed by the public benefits of the proposals. The public benefits arising from the proposals are significant and set out below.

Environmental Benefits

10.24 The positive impacts that will be delivered as a result of the Proposed Development will greatly improve the local environment by:


- Re-using and adapting the existing structure;

- Providing a highly sustainable new building which uses recycled and low carbon materials;
- Improving the townscape and street scene by creating a new, coherent building of a high-quality design;
- Delivering a building which achieves a BREEAM score of “Excellent” as a minimum for the office element at pre-assessment stage with aspirations for “Outstanding”;
- Achieving a 35% improvement over the Building Regulations Part L 2021 Target Emission Rate.
- Promoting sustainable modes of travel with a focus on cycling and end of trip facilities;
- Promoting urban greening along the proposed biodiversity and ecology benefits;
- Installation of new central plant space on building 3 to make the estate more energy efficient (included as part of the wider redevelopment of the building);
- Installation of photovoltaic (PV) panels at roof level to supplement the electrical energy generation; and
- Introduction of blue and green roofs with SuDs benefits.

Economic Benefits

10.25 The Proposed Development makes a number of economic contributions to Camden through:

- Providing new high-quality office accommodation to support the economic function of the CAZ;
- Increasing the employment density of the Site as a result of more efficient floorplates and plant equipment;
- Increasing the footfall within the area, in turn supporting local businesses;
- Optimising the use of the land to maximise the commercial floorspace and provision of residential floorspace through a payment in lieu;
- Investment in the Camden economy through local procurement during construction; and
- Providing opportunities for local jobs and construction apprenticeships through the construction phase of the development.



Social Benefits

- 10.26 The Proposed Development makes a contribution to social well-being in Camden through:-
- Reducing crime and antisocial behaviour through design improvements and increasing natural and passive surveillance;
 - Pedestrian and cycling improvements through the Site;
 - Opportunities for local people to undertake construction apprenticeships;
 - Sustainable office space for workers with a focus on wellbeing;
 - Provision of outdoor amenity space of the commercial occupiers; and
 - Providing level access to all users of the building and accessible features within the external courtyard.

Townscape Impacts

- 10.27 An assessment of the Townscape impact has been prepared by KM Heritage and is included within the Design and Access Statement. This assessment appraises each of the key views included within the Design and Access Statement, as previously agreed with LB Camden through the pre-application phase of the development.
- 10.28 Broadly, the Proposed Development is found to enhance the surrounding townscape, providing 'clarity' and 'simplicity'. The scheme is considered to respond well in terms of scale, massing, façade design and materiality to the importance and significance of Waterhouse Square. The proposed works create a clear visual separation between the old and new elements of the estate, particularly the new active frontage and entrance on Greville Street and Leather Lane.
- 10.29 On balance, the Proposed Development is considered to enhance the surrounding townscape and Conservation Area. It therefore complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It also preserves and enhances the setting of non-designated heritage assets (nearby locally listed buildings). The proposed scheme is consistent with the design and heritage policies of the National Planning Policy Framework, the London Plan and Camden's Local Plan.



11 Energy and Sustainability


- 11.1 This section of the Statement assesses the proposed energy and sustainability strategy for the Proposed Development against policy standards.

Policy Context

- 11.2 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 11.3 Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives: an economic objective, a social objective and an environmental objective. The latter is in place to contribute to protecting and enhancing the natural, built and historic environment including making effective use of land, helping to improve biodiversity, minimising waste and pollution and mitigating and adapting to climate change including moving to a low carbon economy.
- 11.4 Paragraph 152 reiterates that the planning system should support the transition to a low carbon future in a changing climate. Particular importance is placed on shaping places in ways that contribute to radical reductions in greenhouse gas emissions, minimising vulnerability and improving resilience, encouraging the reuse of existing resources including the conversion of existing buildings and supporting renewable and low carbon energy and associated infrastructure.

London Plan

- 11.5 Policy SI2 of the London Plan states that major development should be net zero carbon by achieving reductions in greenhouse gases in operation and through the energy hierarchy of; “be lean, be clean, be green, be seen”. Part C of the policy sets out that a minimum on site reduction of 35% is required for major development, 15% of which should be achieved through energy efficiency measures for non-residential development.



11.6 Policy SI3(A) of the London Plan relates to energy infrastructure, as boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals.

11.7 Policy SI7 of the London Plan supports reducing waste and supporting the circular economy to support resource efficiency.


Camden Local Plan

11.8 In July 2019, Camden declared a climate emergency and subsequently published a Climate Action Plan setting out how the Council will work towards zero carbon by 2020.

11.9 Policy CC1 of the Local Plan sets out that the Council will require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation by promoting zero carbon development, requiring all development to reduce carbon dioxide emissions through the London Plan energy hierarchy and to promote sustainable travel.


11.10 Part E of the policy requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. The supporting text at paragraph 8.17 of the Plan states that all proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Paragraph 8.19 of the Plan states that the Council will expect developers to consider the service life of buildings and their possible future uses to optimise resource efficiency.

11.11 Policy CC2 of the Local Plan requires all development to be resilient to climate change by promoting sustainable design and construction measures. Developments involving conversions of over 500sqm should achieve BREEAM “Excellent” non-domestic buildings. The Energy Efficiency CPG sets out minimum requirements for 60% of all Energy and Water BREEAM credits and 40% of all Material BREEAM credits being achieved.

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- 11.12 Policy CC3 of the Local Plan seeks to reduce flood risk and maximise water efficiency through the use of Sustainable urban Drainage Systems (SuDS) to achieve greenfield runoff rates where feasible.
- 11.13 The Water and Flooding CPG published in March 2019 sets out detailed standards for promoting water efficiency including rainwater harvesting, recycling water through grey water systems and SuDS.
- 11.14 London Planning Guidance Camden Planning Guidance have also been considered in respect of energy and sustainability matters.

Assessment

- 11.15 A suite of documents have been prepared and are submitted with the application relating to sustainability. The Design and Access Statement, prepared by Orms Architects, Sustainability Statement prepared by Hoare Lea (including the Sustainability and Energy Camden Proforma and the BREEAM Pre-Assessment), should be read alongside this Statement.
- 11.16 Sustainability is a key aspect of the Proposed Development in all manners, not only in terms of BREEAM and life-time carbon reduction but in its operational phase in terms of health and wellbeing.
- 11.17 The Proposed Development is underpinned by the ambition to retain the existing frame and provide the most sustainable building, minimising demolition and maximising retention and reuse. High performance materials will be used across the new aspects of the building and the design will optimise the durability and lifespan of the building. surface water run-off will be reduced through Sustainable Urban Drainage Systems and biodiverse roofs and blue roofs will be installed where appropriate.
- 11.18 Be lean measures have been optimised for the Proposed Development including a façade upgrade to optimise building envelope performance minimising unwanted infiltration, heat gains, and heat losses. Natural daylighting has been achieved through glazing provision whilst balanced with minimising unwanted solar gain during summer months. The existing listed



façade will benefit from a window upgrade to reduce infiltration and improve thermal performance where a full façade upgrade is not possible due to listed building requirements.

- 11.19 General ventilation to the building will be provided by air handling units (AHUs) located in basement plant rooms. Full details of the proposed strategy and provide within the accompanying Design and Access Statement.
- 11.20 The Citigen heat network lies within a 1km from the Site, however connection is not proposed due to this network currently being fed by fossil fuel generators. This is in contradiction to the Proposed Development aspiration to be fossil fuel free in line with becoming a net zero carbon site by 2050. Instead, the Proposed Development will be fed from a local heat network fed from combined air source heat pumps serving three buildings on the wider Waterhouse Square site. This will enable heat recovery between the buildings on site, recovering heat from cooling operation to feed domestic hot water demand.
- 11.21 The development will also be provided with a PV array to generate on site renewable energy.
- 11.22 In addition to Part L compliance modelling the Proposed Development will be assessed against the NABERS Design for Performance scheme to predict operational energy at design stage and to then verify this after a year of operation. This will ensure the design intent is achieved in operation and ongoing monitoring of energy consumption will be implemented to track and optimise building consumption in use.
- 11.23 Taking the above into consideration, the Proposed Development is set to achieve an overall 35% reduction in carbon dioxide emissions over Part L 2021.
- 11.24 A BREEAM pre-assessment has been prepared by Hoare Lea and is found in Appendix A of the Sustainability Statement. It concludes that the development will achieve a minimum score of 80.21% 'Excellent' for the proposals.
- 11.25 The Proposed Development will be highly sustainable and fully accord with the NPPF and the presumption in favour of sustainable development, London Plan Policy SI2, SI3 and SI7, Local Plan Policies CC1-CC3, the Energy Efficiency CPG and Water and Flooding CPG.



12 Transport, Deliveries and Servicing

12.1 The following section sets out the approach to transport and servicing.

Planning Policy Context

12.2 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainably.

12.3 Paragraph 104 of the NPPF seeks to promote sustainable transport and states that “Transport issues should be considered from the earliest stages of plan-making and development proposals.”

12.4 Paragraph 110 requires development proposals to ensure that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the Site can be achieved for all users;
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

London Plan

12.5 London Plan Policy T1 stipulates that Development Plans should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. It also requires all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.

12.6 Policy T5 sets out the Mayor's approach to cycling and cycle parking. Developments should provide cycle parking at least in accordance with the minimum standards set out in the Plan. The following standards are relevant to the Proposed Development:

- 1 long stay space per 75 sqm
- 1 shot stay space per 500 sqm (first 5,000 sqm), thereafter, 1 space per 5,000 sqm

12.7 Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

12.8 Policy T6 states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport.

12.9 Policy T7 requires development proposals to facilitate safe, clean and efficient delivery and servicing. In achieving this, proposals should provide adequate space for servicing, storage and deliveries, with a priority for off-street servicing. On-street servicing should only be provided where off-street servicing is not possible.

Local Plan

12.10 Policy T1 of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in Camden by supporting public realm improvements and the pedestrian environment, promoting cycling and providing high quality parking and end of trip facilities in developments. Policy T2 of the Local Plan requires all new development in the Borough to be car free. Policy T4 of the Local Plan requires developments over 2,500sqm to provide Construction Management Plans, Delivery and Servicing Management plans and Transport Assessments.

12.11 The Transport CPG published in March 2019 provides detailed guidance relating to deliveries and servicing, cycle parking and end of trip facilities.




Assessment

Parking

- 12.12 Cycle parking will be provided in line with the London Plan and the London Cycle Design Standards, resulting in a significant improvement to the existing building.
- 12.13 The Proposed Development would provide 422 long-stay cycle parking spaces. These would be provided at lower ground level and can also be accessed via two cycle lifts and two sets of shallow stairs with wheeling ramps (four ramps in total). Associated facilities such as showers, lockers, changing rooms and drying facilities would be provided at the basement level.
- 12.14 A total of 35 short-stay cycle parking spaces will be provided. 16 of the spaces would be provided for the office at ground floor level. It is not possible to accommodate the remaining 19 spaces within the site boundary. It is therefore proposed to utilise the public highway on Brooke's Market or Beauchamp Street. The location of these spaces will be agreed with LB Camden and secured through a legal agreement.
- 12.15 It is proposed that the development would be car free. In the event that a Blue Badge holder requires a parking space, a Camden Green Badge will be purchased for the holder.
- 12.16 Taking into consideration the above, the proposed parking levels are demonstrated to comply with London Plan minimum requirements set out in Policies T5 and T6, as well as Policy T1 and T2 of the Local Plan.

Deliveries and Servicing

- 12.17 A dedicated refuse store is provided at lower ground level. On waste collection days, the refuse bins will be wheeled to and from the refuse store to the goods lift, and then to the existing loading bays for collection.
- 12.18 Deliveries and servicing for the development will continue to be from the existing loading area. The loading area is a designated off-street loading area, accessed from Brooke Street



to the west of the Site. Three 8m bays and three 6m bays are provided within the existing development.

12.19 Access to the loading area will be closed when not in use. Deliveries will be pre-booked and managed to prevent vehicles waiting on street.

12.20 The delivery and servicing proposals have been prepared to ensure the continued successful operation of servicing activity and refuse collection at the Site on a day-to-day basis. It ensures that there are limited opportunities for conflict with pedestrians and other vehicles and that the servicing of the Development would not affect the free flow or environmental condition of the highway. The proposed delivery, servicing and waste strategies have been discussed with both Transport for London and Camden Council Highways Officers. The development proposals accord with national, regional and local policies.




13 Other Material Considerations

- 13.1 This section provides an assessment of other relevant material considerations including; daylight, sunlight and amenity.

Daylight, Sunlight and Amenity

- 13.2 Paragraph 127 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.
- 13.3 Policy D13 of the London Plan introduces the Agent of Change principle which seeks to manage noise and other potential nuisances through good design and locating uses in appropriate locations.
- 13.4 Policy A1 of the Local Plan sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider:
- Visual privacy and outlook;
 - Sunlight, daylight and overshadowing;
 - Artificial lighting levels;
 - Transport impacts;
 - Construction phase impacts
 - Noise and vibration levels;
 - Odour, fumes and dust;
 - Microclimate;
 - Contaminated land; and
 - Impact upon water and wastewater infrastructure.



Assessment

- 13.5 The Proposed Development has been assessed in terms of its potential for impact on the amenity of the surrounding sensitive receptors. A Daylight and Sunlight Analysis has been prepared by Point 2 which has been submitted as part of the planning application.
- 13.6 Having regard for the findings of the Vertical Sky Component (VSC) and No Sky Line (NSL) tests for daylight and Annual Probable Sunlight Hours (APSH) test for sunlight, there are three properties (1-23 Cranley Buildings Brookes Market; Baldwins Gardens, Brookes Court; and Evelyn Buildings, Brookes Market) which experience reductions beyond the BRE guidelines. The Assessment has considered ten neighbouring properties in total, in addition to those listed above, all windows meet the BRE guidance for daylight and sunlight or only experience minor alterations in daylight and sunlight, which are considered acceptable in this urban context.
- 13.7 On balance, whilst some of the windows experience reductions for VSC, NSL and ASPH in excess of BRE guidance for some windows within the three properties, the existing daylight levels are low and therefore the actual reduction in daylight levels is relatively low. Indeed, the effect of the change can be considered acceptable as the actual reductions are small or the retained values are in line with or above Point 2 we would consider an adequate or good level of daylight for an urban area.
- 13.8 Point 2 have prepared a comprehensive analysis which concludes that the light losses to neighbouring properties will not alter how any of the most impacted rooms are used. The report sets out that there is a good level of daylight amenity within the Proposed Development which is commensurate with comparable development in many cases, higher than what one would ordinarily see for a residential development within central London. The Proposed Development is therefore considered to comply with Local Plan Policies A1(f) and D3 and paragraph 127 of the NPPF.




Noise

- 13.9 The NPPF contains guidance on noise management in planning decisions. Paragraph 185 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts.
- 13.10 London Plan Policy D13 states the 'Agent of Change' principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Part D notes that development proposals should manage noise and other potential nuisances by:
- Ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area; and
 - Exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations.
- 13.11 Separating new noise sensitive development where possible from existing noise generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.
- 13.12 Policy D14 of the London Plan notes that development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life.
- 13.13 Policy A4 of the Local Plan sets out that noise and vibration in developments will be managed, and planning permission will only be granted for noise generating equipment (including plant and machinery) if it can be operated without causing harm to amenity. Detailed standards are set out in Appendix 3 of the Local Plan.

Assessment

- 13.14 An Acoustic Report has been prepared by Hoare Lea and has been submitted with the application. An assessment has been carried out to determine the existing environmental sound levels at the Site to establish the baseline acoustic environment. An assessment of



noise ingress and emissions as a result of the Proposed Development has then been prepared to determine the impact of the development.

13.15 Regarding noise ingress, the assessment demonstrates that external noise ingress can be readily controlled with standard façade constructions and double-glazing window configurations. Ventilation, heating, and cooling demands are to be supplied mechanically and so users will not be reliant upon façade openings.

13.16 For noise emissions, the assessment of the proposals indicates that plant noise levels are expected to range from 0 – 6 dB below prevailing background sound levels when assessed the nearest noise-sensitive receivers. This aligns with the “Amber” noise thresholds as set out within Camden Local Plan and would be considered indicative of low impact in the context of BS 4142.

13.17 The proposals are therefore considered compliant with the strategic objectives of Camden’s Policy A4 which seeks to prevent “development likely to generate unacceptable noise and vibration impacts” as well as paragraph 185 of the NPPF.

14 Planning Obligations and the Community Infrastructure Levy

- 14.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 14.2 The NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It repeats the tests set out above and then states that where planning obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, where appropriate, be sufficiently flexible to prevent planned development being stalled (paragraphs 54-57).
- 14.3 Policy DM1 of the Local Plan sets out that Council will use planning obligations, where appropriate to (i) support sustainable development, (ii) secure the infrastructure, facilities and services to meet the needs generated by development and (iii) mitigate the impact of development.

Community Infrastructure Levy

- 14.4 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG. The relevant MCIL2 rates are as follows:
- Office- £185 per sqm.
- 14.5 Camden CIL came into effect on 30 October 2020. The CIL tariff for sites located within Central Camden (i.e. Zone A) are charged at the following rates:
- Office- £110 per sqm.



Developer Contributions CPG (March 2019)

14.6 The CPG sets out how the Council will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that financial contributions will be sought in respect of affordable housing, open space, infrastructure to address the Site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

Draft Heads of Terms

14.7 At this stage, it is anticipated that the following Section 106 contributions and obligations involved with this development could include:

- Carbon Offset Contribution;
- Section 278 Highway works;
- Delivery and Servicing Management Plan;
- Travel Plan Monitoring;
- Energy, Renewable Energy Efficiency and Sustainability Plans;
- Construction Management Plan;
- Processing and monitoring charges;
- Mixed Use Contribution and
- Affordable Housing Contribution.

15 Summary and Conclusions

- 15.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Town Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 15.2 This application is submitted following pre-application engagement with both Camden Council Officers through entering into a Planning Performance Agreement, and the local community and other key stakeholders as described in the Statement of Community Involvement, prepared by London Communications Agency and at Section 5 of this Statement.
- 15.3 During this process, there have been alterations to the scheme in terms of the building massing and design, demonstrating that the design team have responded positively to feedback received.
- 15.4 The Proposed Development has been designed to an exemplary standard by Orms Architects, supported by a full design team to revise an iconic building in an exciting area of growth and change. The Proposed Development would secure the delivery of high-quality commercial floorspace for Camden.
- 15.5 A contextual, responsive and highly sustainable design approach would turn the Site into a positive contributor to the Hatton Garden Conservation Area, refurbishing the existing building which is poor quality and achieving a BREEAM excellent rating.
- 15.6 The Proposed Development will sensitively refurbish and extend the existing building to provide high quality commercial floorspace (Class E). The proposals seek to enhance the existing building, reinstating the historic courtyard and repairing the historic fabric of the Site to enhance the Grade II* building and positively contribute to the Hatton Garden Conservation Area and local townscape.
- 15.7 The Site benefits from excellent public transport accessibility and would optimise the use of land on a previously developed Site in an area allocated for commercial growth.



15.8 As set out in this Statement, the Application complies with the relevant statutory tests, policies within the NPPF, the London Plan, the Camden Local Plan, and the principles of the presumption in favour of sustainable development. From this Statement, it is concluded that there are no material considerations of sufficient weight to determine that these applications are other than in accordance with the Development Plan. The proposals constitute sustainable development. On this basis, planning permission should be granted accordingly.

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