



45-54 Saffron Hill and 3 Saffron Street

# PLANNING STATEMENT

March 2024

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## 1. INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Saffron Hill Investment Holdings Limited (the “Applicant”) in support of the following application to London Borough of Camden Council (“LBC or the “Council”) for full planning permission for the following:

*‘Demolition of existing car park and offices, and erection of a new building providing Class E Commercial floorspace and Class E café/restaurant space, along with associated landscaping and works’.*

1.2 The Proposed Development encompasses the following key features:

- Replacement of existing car parking space with Grade A Office Floorspace in a CAZ and central borough location;
- Architecture and materiality to respond to and enhance the surrounding townscape and conservation area, and remove the existing building which is noted as a negative contributor;
- Activated frontage on all aspects of the Site, including a new café/restaurant on the corner of St Cross Street and Saffron Hill;
- A substantial provision of Affordable Workspace;
- Significant improvements to public realm on St Cross Street;
- Provision of CPG Compliant levels of cycle parking.

### **Content of the Planning Application Submission**

1.3 The following documents have been submitted in support of this application, in agreement with LBC Officers:

<b>Application Documents</b>
Covering letter
Site Location Plan
CIL Additional Questions Forms
Planning Statement

Design and Access Statement Addendum
Townscape, Visual & Built Heritage Assessment
Energy Statement
Whole Life Carbon Assessment
Circular Economy Statement
Sustainability Statement
Pre-demolition audit
BREEAM Stage 2 Pre-Assessment
Regeneration Statement
Health Impact Assessment
Daylight and Sunlight Report
Air Quality Report
Structural Report (including Contaminated Land Assessment)
Basement Impact Assessment (including Appendices and Flood Risk Assessment/SUDS)
Ecology Appraisal
Noise Assessment
Outline Construction Management Plan
Transport Assessment and Servicing Strategy
Archaeological Assessment
Statement of Community Involvement
Fire Strategy

1.4 The remainder of this Planning Statement comprises the following sections:

- Section 2.0: Site and Surrounding Area;
- Section 3.0: Planning History;
- Section 4.0: Pre-Application Engagement;
- Section 5.0: Application Proposal;
- Section 6.0: Planning Policy Framework Overview;
- Section 7.0: Planning Policy Assessment;
- Section 8.0: Conclusion.

## 2. SITE AND SURROUNDING AREA

- 2.1. The Site measures 0.145Ha and is situated on Saffron Hill in the south-east of the Borough, bound by St Cross Street to the south, Saffron Street to the north, and Farringdon Road to the east. Directly adjacent to the Site lie 77-79 Farringdon Road, 75 Farringdon Road, and 59 Saffron Hill.
- 2.2. The surrounding area is characterised by a mix of residential and commercial uses with a mix of architectural styles. The general characteristics of the Hatton Garden area include narrow streets with oblique views of building façades, sloping topography, and several Victorian brick warehouses combined with later buildings of a mix of architectural styles. The Sub Area of Farringdon Road within which the Site lies is noted in the Hatton Garden Conservation Area Audit as *'lacking a distinct character owing to a large amount of rebuilding since the Second World War'*.
- 2.3. The existing building is occupied by a car park, providing 353 car parking spaces from basement to level 6, with offices on levels 7 and 8. The building is externally composed of a mostly metal façade, with pre-cast concrete elements at ground floor. Brickwork and textured concrete panels clad the cores.
- 2.4. The existing offices are occupied by the car park operator, NCP, and are of poor quality, failing to meet contemporary standards for office buildings. The premises offer low refit opportunity and future flexibility, with non-compliant fire escape arrangements, poor quality façade and windows which do not comply with Part L requirements, a low, energy inefficient wall:floor ratio, and lifts and WC provision that do not allow for disabled users.
- 2.5. The existing car park suffers from low floor to ceiling heights, and a split structure that means significant intervention would be required to provide level floorplates. Archive documents suggest that the car park was made using British Lift Slab construction system. Several car parks and residential blocks using this construction system have since been demolished due to safety concerns. It is unclear whether this car park suffers similar structural defects.
- 2.6. The existing public realm condition is of poor quality, with a constrained area between the kerb line and existing building line. The sloping site creates a half-level condition on Saffron Hill. As internal slab levels do not interface with the surrounding public realm levels, little of the ground floor is active, with large elements of solid, unexpressed elevation, and mechanical extract grilles exhausting directly onto the pavement.

- 2.7. The Site lies within the Hatton Garden Conservation Area. The Hatton Garden Conservation Area Appraisal and Management Strategy (2017) notes the existing building as making a negative contribution to the conservation area, included in one of 15 buildings cited as having *'a negative impact upon the character and appearance of the Area, for example because of inappropriate bulk, scale, height or materials, poor quality design or construction, or because they fail to address the street.'*
- 2.8. The existing building is neither listed, nor are there any statutorily listed buildings within the Site or in the immediate vicinity.
- 2.9. The Site is not subject to a Site Allocation in the Camden Local Plan. The Site lies within the Central Activities Zone, as well as LVMF Protected Vistas 2A.1 (from Parliament Hill) and 3A.1 (from Kenwood House Gazebo). As stated in the Camden Local Plan, the Site also lies within the Hatton Gardens Special Policy Area.
- 2.10. The Site has a PTAL rating of 6B (excellent), with Farringdon Station situated approximately 270m north-west of the Site. Chancery Lane London Underground station is located around 570m south-west of the Site.
- 2.11. The Site is located along the TfL Cycleways Cycleway 6 (northbound lane to the west on Saffron Hill and southbound lane to the east on the A201 Farringdon Road). The Cycleway connects Camden Town to the north with Elephant & Castle in the south.
- 2.12. The Site is subject to the following designations as identified on the LBC 2019 Policies Map:
- Central London Area
  - Hatton Garden Conservation Area
  - Hatton Garden Local Centre

### 3. PLANNING HISTORY

- 3.1. The Site has a relatively limited planning history, with the existing building constructed in the 1950s. Any relevant permissions are set out below.
- 3.2. Permission 36863 was granted on the 6<sup>th</sup> September 1983 for the '*continued use of the building as offices*'.
- 3.3. Permission PSX0204314 was granted on the 9<sup>th</sup> May 2002 for '*Replace existing crittal windows with white UPVC double glazed units, as shown on drawing numbers: 179-WIN\_ELE, SAF-WIN, SAF-7&8-elev 2-axis B, elves-axis B, elves-prop, elev 2-prop, 1 sheet drainage and screw positions, Manufacturers specification, 2 sheets photos*'.
- 3.4. Permission 2012/4162/P was granted on the 8<sup>th</sup> October 2012 for '*Alterations to existing roof terrace at 7th floor level in north-west corner fronting Saffron Hill, involving the replacement of existing uPVC windows with doors, the installation of a raised deck area with ramp and the replacement of existing metal balustrade with new aluminium balustrade all in connection with the existing office use.*'

## **4. PRE-APPLICATION ENGAGEMENT**

4.1. The Applicant has undertaken a thorough pre-application process and has made significant effort to engage with stakeholders. The Proposed Development has evolved in response to the consultation feedback, which has provided the applicant with a clear vision of what is expected of the scheme.

4.2. This section sets out the programme of engagement that has been undertaken, which can be broadly categorised within the following stakeholder groups:

- LBC Officer Engagement;
- Public and Stakeholder Consultation;

4.3. Further details of the public consultation process are provided within the Statement of Community Involvement prepared by Kanda, which has been submitted in support of the application.

### **LBC Officer Engagement**

4.4. A series of pre-application meetings have been held with Camden Borough Council Planning and Design Officers, which has allowed the development to evolve in response to the feedback received.

4.5. Separate pre-application discussions have been held with LBC Planning Officers on:

- 20<sup>th</sup> April 2023;
- 25<sup>th</sup> May 2023;
- 22<sup>nd</sup> June 2023;
- 3<sup>rd</sup> August 2023;
- 4<sup>th</sup> October 2023 (Transport Workshop);
- 9<sup>th</sup> November 2023

4.6. The pre-application process has been generally positive, with the proposed development and the Applicant's engagement receiving general support from Officers. Pre-application feedback from Officers has been comprehensively responded to both during pre-application and within



the planning application, including a justification on the lack of housing and activation of the ground floor of the building.

- 4.7. The principle of development was supported by Officers, particularly the removal of the existing car parking spaces and replacement with new office space in a central borough and CAZ location. Officers also strongly supported the proposed cycle parking provision, which was noted as a substantial uplift from the existing condition and encouraging more sustainable modes of travel when compared to the existing car park.
- 4.8. After reviewing the justification provided by the Applicant, Officers agreed that the principle of demolition of the existing car park is acceptable, noting the impracticalities of retaining or refurbishing the car park, and the nature of the structure meaning that substantial intervention would be necessary as part of a substantial refurbishment scheme, which would fail to deliver the level of benefit provided by the Proposed Development. A 'Reclaim and Recycle' solution was supported on the basis of retaining any elements of the existing structure, where possible, and seeking to optimise the operational performance of the proposed building.
- 4.9. Officers were broadly supportive of the architectural approach, and noted the proposed building would represent '*a valid and high quality approach to the site and Conservation area*'. Officers also accepted the principle of adding storeys to the existing building, however noted this would be contingent on mitigating adverse impacts on local amenity.
- 4.10. In response to comments from Officers, the granularity of the ground floor façade was enhanced, and the texture and scale has been refined to align with the upper floors and the surrounding townscape.
- 4.11. The nature and quantum of affordable workspace was a recurring feature of pre-application discussions, and was revised in response to Officer comments. Officers ultimately supported the proposed offer, which would see the Affordable Workspace benefit from its own dedicated ground floor entrance, with a substantial quantum of space provided at basement level totalling 586sqm and equating to 6% of the office uplift.
- 4.12. The pre-application process concluded with Officers praising the proposed development and level of engagement, and supporting the submission of the planning application.

- 4.13. The Proposed Development was presented to the Camden Design Review Panel on the 15<sup>th</sup> September 2023. The Panel were supportive of the proposals and the principle of development, and noted the height and massing as being acceptable and an overall improvement to the Conservation Area.
- 4.14. The Panel encouraged the relocation of the café to the corner of St Cross Street and Saffron Hill, where it would provide greater contribution to the public realm. Improvements were also encouraged to the public realm on St Cross Street. In response to these requests, the Applicant team relocated the café and restaurant space to the corner, and implemented significant improvements to the adjacent public realm, creating a ‘pocket park’ on St Cross Street that would benefit from a widened pavement and several green features, a major improvement on the existing pedestrian environment.
- 4.15. The Panel also encouraged more granularity in the base of the building, and the flexibility and adaptability of the proposed office space to ensure it can accommodate future uses. Both of these requests have been fully taken into account in the final design of the development, which was presented to Officers at the final pre-application meeting on the 9<sup>th</sup> November 2023.
- 4.16. The Design Review Panel process has been constructive and cooperative, and the Applicant team have responded proactively to each of the comments raised by the Panel, improving the overall quality of the scheme.

### **Public and Stakeholder Consultation**

- 4.17. The Applicant undertook a detailed public consultation, with a series of targeted public engagement activities held to present the proposed scheme to local residents and stakeholders between January and February 2024.
- 4.18. In addition to establishing a website for the project, flyers were issued to 1,263 addresses in the local vicinity, inviting recipients to meet with the project team or provide their feedback.

- 4.19. The Applicant team held a meeting with local residents on the 19<sup>th</sup> February 2024, where the residents had the opportunity to raise any concerns, and the Applicant team provided a presentation on the scheme and consider how concerns would be addressed. Concerns raised included construction impacts, daylight/sunlight, overlooking and privacy, and the control of the building to preserve residential amenity.
- 4.20. The feedback received during the public consultation has been taken into account and a series of measures introduced to address residents' concerns, including the set back of terraces, soft landscaping and screening at terrace level, and a controlled construction logistics to mitigate adverse impacts on amenity. Detail of the design response is set out within the Design and Access Statement, and further detail of the feedback is provided within the Statement of Community Involvement.

## 5. PROPOSED DEVELOPMENT

- 5.1. This Planning Statement has been prepared on behalf of Saffron Investment Holdings Limited in support of the following application to London Borough of Camden Council for:

*'Demolition of existing car park and offices, and erection of a new building providing Class E Commercial floorspace and Class E café/restaurant space, along with associated landscaping and works'.*

### **The Proposals**

- 5.2. The proposals will see the demolition of the existing 8 storey building and the redevelopment of the Site to provide a new 9-storey building comprised of Class E Office floorspace on the ground and upper floors, Class E café and restaurant space on part of the ground floor, and affordable workspace at ground and basement level. Whilst the proposed use of the Class E ground floor space is café/restaurant use, and planning application documents and surveys have been drafted on this basis, flexibility is also sought for wider Class E uses.
- 5.3. The proposed development will fully activate the non-existent frontage around the site, with entrances proposed on Saffron Hill, St Cross Street, and Saffron Street. An active ground floor will be shared by a large office unit, the entrance to the affordable workspace on Saffron Hill, and the café and restaurant space on the corner of Saffron Hill and St Cross Street, which will bring activity to the area, and increase safety and natural surveillance in the surrounding environment.
- 5.4. A dedicated cycle entrance is located on Saffron Street, which provides access to cycle storage located in the basement as well as changing room facilities and lockers for all uses on the site.
- 5.5. Public realm improvements and a pocket park are proposed directly in front of the Café/restaurant entrance, which will optimise greening on St Cross Street and create space for pedestrians to dwell and users of the café space to spill out. The immediate locality is significantly lacking in public or green space, therefore the proposed improvements to St Cross Street should be noted as a major benefit of the proposals.
- 5.6. The upper levels of the building are stepped back to ensure that impacts on daylight and sunlight on neighbouring buildings are limited, and also result in the building slotting in amongst

surrounding townscape. An acoustic plant screen will be installed at roof level to ensure that noise from plant will be sufficiently attenuated to surrounding residential receptors.

- 5.7. Low carbon design principles have informed the architectural approach from the outset, and the building is made up of a lightweight hybrid structure, an efficient skin with user control, and a streamlined expressed frame for the facade with careful setbacks and passive shading measures to ensure thermal comfort. The proposed development is designed with flexible floorplates, and will incorporate features to allow for the building's disassembly upon end of use.
- 5.8. The existing Site utilised on-street sections of single yellow line kerbside to facilitate deliveries. The Proposed Development will, in a similar manner, utilise existing on-street kerbside locations for the undertaking of deliveries, as agreed during pre-application discussions with LBC. The Development will receive deliveries via the section of single yellow like kerbside which is present within 10m of the Site on Saffron Street. This will provide a short transfer distance of goods between vehicles on-street and the back of house entrance to the Site.
- 5.9. The Development will provide two separate waste stores for the office and cafe land uses, both of which will be provided enabling collection directly from waste stores. The office waste store will be located internally to the north of the Site at ground floor level, accessible from Saffron Street via a service entrance. The office waste store will be lockable and not visible from Saffron Street, with access provided via a ramp to street level.
- 5.10. The café waste store will be located within the café floorspace in a back of house area, accessible via the main entrance to the café which is located on the St. Cross Street frontage in the southwest corner of the Site.
- 5.11. All waste collections will occur on-street using the appropriate on-street facilities (single yellow line kerbside on Saffron Street and double yellow line kerbside with single blips on Saffron Hill for café) during the controlled hours. Waste collection vehicles can stop within 10m of the building entrances to ensure that drag distances are minimised.
- 5.12. The following table summarises the existing and proposed floorspace by land use (Table 5.1):

Floorspace	Use Class	Floorspace (sqm GIA)
<b>Existing</b>		
Offices	Class E	1,310
Car Park	Sui Generis	10,425

<b>Total</b>		<b>11,735</b>
<b>Proposed</b>		
Offices	Class E	11,679
Café/Restaurant	Flexible Class E	173
<b>Total</b>		<b>11,852</b>

**Table 5.1 Existing and Proposed Development Floorspace Schedule**

- 5.13. The Proposed Development comes forward as car-free, however, should it be requested by LBC, the Applicant is willing to provide the appropriate financial contribution towards the delivery of an on-street blue-badge parking bay to provide accessible parking for future Site users. The Applicant met with LBC Transport Officers on the 4<sup>th</sup> October 2023, where it was agreed that the disabled bay could be introduced by the Council if demand arises in the future, and would be secured through the Section 106 accordingly.
- 5.14. The Proposed Development will deliver 205 long-stay cycle parking spaces at lower ground floor level for the office space, accessible from both a cycle lift and a cycle stair with a cycle ramp. The cycle parking will be accessible via an entrance from Saffron Street to the north. Owing to maintaining secure and separated access between the office and café uses, it is not possible to provide a shared cycle store at lower ground floor. As such, long-stay cycle parking for the café element on-site will be delivered within the unit, with space provided to be allowed for 6 cycles in line with London Plan standards.
- 5.15. The proposals will deliver 18 short-stay cycle parking spaces in the form of 9 Sheffield stands. These spaces will be located on St Cross Street as part of the new public realm proposals to the south of the Site, for use by visitors to the café/restaurant space.

## **6. PLANNING POLICY**

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise. The Development Plan is made up of the following documents:

- London Borough of Camden Local Plan (Adopted July 2017);
- The London Borough of Camden Policies Map (Adopted 2019);
- London Plan 2021 (Adopted March 2021).

6.2 This section assesses the relevant planning policy and guidance at national, regional and local levels, and specific topics relevant to the assessment of the Proposed Development in planning terms.

### **Planning Policy Framework and Site Designations**

6.3 In addition to the above, the wider planning policy framework for the Site has been taken into consideration. This includes the National Planning Policy Framework (NPPF) which carries material weight in decision making along with the relevant Planning Practice Guidance (PPG), the National Design Guide and Supplementary Planning Guidance (SPG).

6.4 This section sets out the planning policy framework and guidance of relevance to the Proposed Development and identifies planning designations that relate to the Site. References to specific policies and guidance are included where relevant in the Planning Policy Assessment of the Proposed Development in Section 7.

### **National Planning Policy**

6.5 The National Planning Policy Framework (last updated December 2023) (NPPF) focuses on the delivery of sustainable development and requires that there is a presumption in favour of sustainable development. The core planning principles include, amongst others, to “drive and support development” and to “encourage” the effective use of land by reusing land that has been previously developed.

- 6.6 Paragraph 157 of the NPPF states that the planning system should support a transition to a low carbon future in a changing climate, and help to shape places that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources including the conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.
- 6.7 This element of the NPPF is considered in further detail from paragraph 7.39 of this statement, however with reference to Paragraph 157 it is important to note the *'Marks and Spencer PLC vs Secretary of State for Levelling Up, Housing and Communities'* ruling, dated 1<sup>st</sup> March 2024, specifically the conclusion that *'there is in (NPPF) paragraph 152 (now 157) some encouragement for the reuse of buildings, but nothing that comes close to a presumption'*.
- 6.8 The NPPF notes that proposed development that accords with an up-to-date Development Plan should be approved without delay.
- 6.9 The NPPF is supplemented by an online suite of Planning Practice Guidance (PPG), which is updated periodically and the National Design Guide, which was published in October 2019.

### **Regional Planning Policy**

- 6.10 The London Plan 2021, adopted in March 2021, is the principal land use and planning guidance for London and forms part of the Camden Borough Council Development Plan. It sets out the spatial strategy and policy context for how and where growth should be accommodated across London. These objectives include:
- Optimising the development of previously developed land;
  - Promoting development in areas accessible by public transport; and
  - The potential of mixed-use development to strengthen communities and local economies.
- 6.11 The supporting documents submitted with the planning application also refer to the suite of published Mayor of London Supplementary Planning Guidance (SPG) documents which have helped to inform the composition of the Proposed Development.



**Local Planning Policy**

- 6.12 The Camden Local Plan and Policies Map, adopted in July 2017 and 2019 respectively, are the key policy documents for determining planning applications in the borough.

## **7. PLANNING POLICY ASSESSMENT**

- 7.1. This section reviews the Proposed Development against the policies of the Development Plan at regional and local level.

### **Principle of Development**

- 7.2. The principle of development is supported by policy at a local, regional and national level. The National Planning Policy Framework contains a presumption in favour of sustainable development, which supports policy compliant development and encourages growth. Through their respective plans, both the Greater London Authority and the London Borough of Camden encourage intensification of commercial space in order to consolidate growth, in particular in the Central Activities Zone (CAZ) where the Site lies.
- 7.3. London Plan 2021 policies SD4 and SD5 seek to sustain and promote the CAZ as an international centre of business, promoting new office and commercial uses, and ensuring that development proposals increase office floorspace to meet strategic and local need.
- 7.4. The Proposed Development, with the provision of additional high-quality office, represents the definition of ‘sustainable growth and change’ that intensifies use whilst maintaining strong principles of environmental and social sustainability. The Proposed Development will both intensify and enhance the use of the Site, providing high-quality, sustainable office space. The café/restaurant space at ground floor level is supported by the GLA and has been noted in pre-application feedback as raising no strategic issues. As such, the proposed development fully complies with regional and local policy in terms of the principle of development.

### **Land Use**

- 7.5. Paragraph 123 of the NPPF supports the use of land for “objectively assessed needs, in a way that makes as much use as possible of previously-developed land”. The NPPF also encourages local authorities to seek multiple benefits from urban land through mixed use schemes, whilst taking opportunities to achieve net environmental gains.

- 7.6. London Plan 2021 Policy E1 supports improvements to quality, flexibility and adaptability of office space, and the increase of office stock in CAZ locations. Local Plan Policy E2 aligns with this, encouraging higher intensity redevelopment of premises or sites that are suitable for continued business use, if the level of employment is increased or maintained, if the redevelopment retains existing businesses on the site as far as possible, and if the development includes other priority uses such as housing and affordable housing. Local Plan Policy G1 promotes a strong local economy, and the delivery of additional office and employment floorspace within the borough. The proposal will deliver a minimum of 11,679sqm of Class E office floorspace, in full accordance with London and Local Plan Policy, and contributing significantly towards the economic targets of the borough.
- 7.7. Policy H1 of Camden Local Plan states the Council will look to maximise housing supply, including through, where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site. Policy H2 goes on to state that *'in all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.'*
- 7.8. Paragraph 3.47 expands on Policy H2, stating that The Council has set a threshold indicating that the requirement applies to developments adding more than 200sqm (GIA or gross internal area) on the basis of the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development.
- 7.9. Paragraph 3.48 expands on this, noting the following examples of proposals that would not be required to provide housing:
- the additional floorspace is 200sqm (GIA) or less;
  - the development is in the designated Hatton Garden area, where the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character;
- 7.10. The Proposed Development proposes less than 200sqm of additional floorspace (a 117sqm uplift against the existing building) and is located within the Hatton Garden Area, thus qualifying as an exemption for the requirements of Policy H2.

- 7.11. Nonetheless, as part of the pre-application process the Applicant has sought to justify the fully commercial nature of the Proposed Development to Officers. In the pre-application feedback issued in September 2023 (midway through the pre-application process), Officers stated that *'it has become clear that a purely commercial building is proposed with no housing provided within the scheme. The principle of this could be supported depending on the offer provided in the proposed building. The acceptability of no housing on this site hinges on the level of affordable workspace and successfully activation the ground floor which will play into the planning balance.'* The feedback goes on to state that *'the acceptability of no housing on this site hinges on the level of affordable workspace and successfully activation the ground floor which will play into the planning balance.'*
- 7.12. As established subsequently within this document, the Proposed Development as submitted contains a substantial affordable workspace offering of 586sqm that has supported by Officers and, along with the provision of high quality office space on the upper levels of the building, accepted as justification for the lack of housing within the proposed building. Likewise, the Proposed Development will activate the Site on all frontages and improve the pedestrian experience through the café and public realm improvements on Saffron Hill and St Cross Street.

### **Affordable Workspace / Hatton Garden Special Policy Area**

- 7.13. Policy E2 of the Local Plan states that within the Hatton Garden Special Policy Area, where proposals would increase the total gross internal floorspace by more than 200sqm, the Council will seek for 50% of the additional floorspace as affordable premises suitable for the jewellery sector. In the context of this policy, it is important to note that the proposed development will not create the total gross internal floorspace of the existing building by more than 200sqm. As a result, Policy E2 'Hatton Garden' is not applicable to the development.
- 7.14. Policy E2 of the Local Plan encourages the higher intensity redevelopment of premises or sites that are suitable for continued business provided that the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable. Where workspace has been specified as affordable, the Council's Inclusive Economy Team will work with developers to agree appropriate terms of affordability on a case by case basis.

- 7.15. A number of examples are provided within the Camden 'Employment Sites and Business Premises SPG', including the provision of set quanta of affordable workspace at 50% of comparable market rates.
- 7.16. The Proposed Development will provide 586sqm of affordable workspace, largely provided on a single floorplate at basement level, but also benefitting from a dedicated ground floor entrance on Saffron Street. The overall provision will represent 6% of the proposed office uplift, and has been agreed with Officers at pre-application stage as a meaningful offer that will allow small and medium-sized businesses in the Hatton Garden area to benefit from the development, particularly in light of the relative paucity of affordable workspace within the immediate vicinity. Users of the affordable workspace will also be able to benefit from the new café/restaurant space immediately adjacent to the ground floor entrance, as well as the pocket park created on St Cross Street.
- 7.17. Exact details of the proposed service charges, fit-out arrangements, and discount levels are proposed to be resolved through S106 discussions and an eventual agreement, but are proposed to be broadly in line with policy and recently consented developments.
- 7.18. In light of the above, and as agreed with Officers at pre-application stage, the affordable workspace offer is compliant with planning policy, and should be acknowledged as a further benefit created by the proposed development and a positive contribution to the local area that the existing development fails to provide.

### **Design**

- 7.19. Paragraph 135 of the NPPF states that when making planning decisions, local authorities should require the following from developments:
- Function well and add to the overall quality of the area;
  - Are visually attractive as a result of good architecture, layout and landscaping;
  - Sympathetic to local character and history;
  - Establish a strong sense of place;
  - Optimise site potential to sustain an appropriate mix of development;
  - create places that are safe, inclusive and accessible and which promote health and well-being.

- 7.20. Policy D3 of the London Plan 2021 requires buildings of the highest architectural quality to be provided and the use of details and materials that complement the local architectural character, encouraging optimal design in terms of layout, respect to heritage, and use of materials to complement the surrounding streetscape. Local Plan Policy D1 sets out that LBC will seek to secure high quality design in development and will require that development respects local and historic context, is sustainable in design and construction, integrates with the surrounding area, and incorporates high quality landscape design and amenity space.
- 7.21. The design of the building has evolved throughout pre-application meetings and consultation, seeking to embed the new buildings within the surrounding townscape, whilst incorporating a distinct quality. From its inception it has been underpinned by a vision to provide a development of the highest quality which creates a significant improvement for both occupants and local pedestrians, with a historically sensitive design and materiality aligning with the surrounding townscape.
- 7.22. The façade of the building will incorporate mixed materiality of a masonry base at ground floor levels, and a metal frame on the upper levels, comprised of a lightweight profiled spandrel, a recycled steel secondary frame, and a composite window system with timber internally and aluminium externally. Given the heterogenous use of materials in the surrounding context, the decision was made early on in the design process to use sustainability as the key consideration in the choice of materials, which was supported by Officers in pre-application discussions.
- 7.23. A significant proportion of the embodied carbon of the facade is based on the base steelwork required, therefore the proposals seek to reduce the carbon emissions of the proposals by utilising reclaimed steelwork, finished in a lightweight high quality bronze toned finish, such as bespoke PPC.
- 7.24. The ground floor materiality and entrances have been developed through discussions with LBC officers. A solid base is proposed to provide a strong defensible edge to the public realm and urban character of the area, and a palette high quality self-finish concrete has been chosen to provide a contemporary response to the varied masonry bases that exist across the local area, thus respecting local history whilst also achieving visual attractiveness as per the NPPF paragraph 135.

- 7.25. Multiple entrances have been proposed, to reduce the ‘corporate’ character of the entrance and better align with the context of the conservation area. Between Saffron Hill and the Office Entrance there is a level change of almost two metres, providing each entrance with a distinct appearance, adding a variety to the ground floor. The activation of frontage and natural surveillance around the Site will improve the safety of local pedestrians, whilst the introduction of level access and DDA ramps will ensure the building is inclusive and accessible.
- 7.26. The design of the Proposed Development has been carefully curated to slot seamlessly into the surroundings of the Site, and achieves this through appropriate use of materiality, massing, and overall design, achieving a sense of place and contributing to the wider Conservation Area through the replacement of and improvement on the existing building. In terms of design, the Proposed Development represents a vast improvement on the existing and consented buildings and accords with planning policy at borough and regional level.

### **Amenity**

- 7.27. Policy A1 of the Camden Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours, and will seek to ensure that amenity of surrounding occupiers is protected in terms of visual privacy and outlook and artificial lighting levels.
- 7.28. Paragraph 6.3 of the Local Plan goes on to state that *‘protecting amenity is a key part of successfully managing Camden’s growth and ensuring its benefits are properly harnessed. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.’*
- 7.29. Camden’s Amenity Supplementary Guidance (2021) encourages 18m distance between windows of habitable rooms in existing properties directly facing the proposed development, however goes on to note that there *‘may be circumstances where a separation distance of 18m cannot be achieved. In these instances, mitigation measures should be incorporated to ensure overlooking is reduced to an acceptable level.’*
- 7.30. The SPG goes on to note potential examples to mitigate overlooking including the positioning of buildings at an angle to make it less likely that people will be able to see into neighbouring habitable rooms, and soft landscaping such as trees and shrubs as privacy screens.

- 7.31. A constraint of the Site is its close proximity to neighbouring buildings, with the distance between the existing building and the Ziggurat Building across Saffron Street currently 6.2m on the lower levels, which will be slightly increased to 6.5m as a result of the Proposed Development. The middle levels of the existing building sit between 7m and 10m from the Ziggurat Building, and the Proposed Development will broadly replicate this albeit with a different configuration, with a 10m separation in the middle of the building and 7m-8m separation on the edges.
- 7.32. On the proposed fifth floor terrace, the separation distance will be 12.5m, broadly reflective of the 9m-12.5m separation distance of the existing building.
- 7.33. It is recognised that the separation distance falls short of the 18m encouraged by policy, however this is due to the narrow constraints of the Site, and the Applicant team have undertaken careful design consideration to ensure that surrounding amenity is respected. The building will be set back on its northern boundary, with terrace separation levels stepping from 12m, 14m, 18m, and 23m moving up the building from fifth to eight level.
- 7.34. To ensure that the privacy of neighbouring residents is maintained, proposed floor levels have been staggered in height by around half a storey with the Ziggurat building, which will minimise the possibility of overlooking. Alongside this, the introduction of deep planted zones on the perimeter of the building will provide a natural screen and buffer, preventing office users to approach the edge of the building from the fifth to eight floor. The height of the proposed planting will be higher than eye level, further preventing overlooking. The planting will be a combination of deciduous and evergreen plants, with a sufficient proportion of evergreen plants included to ensure that the screen is preserved year round. Details of the planting and maintenance measures will be secured via condition.
- 7.35. The existing upper floors of the building are operated by the NCP car park and offices, and have no controls or mitigation to prevent overlooking or light spill. The Proposed Development, as an alternative, has been sensitively designed to consider and mitigate these issues. The car park operates 24/7, which means residents experience overlooking by a daily and 'unpredictable' number of visitors, including on evenings and weekends. The Proposed Development's function as a predominantly commercial space means that the offices would typically be occupied from Monday to Friday, and only during working hours.



- 7.36. The existing building also has no control over light spillage. Light Spillage of the Proposed Development will be mitigated and will improve significantly on the existing condition. The existing building has no conditions on use of lights, which remain on for 24 hours for security and H&S purposes. The Proposed Development will provide a managed approach with light pollution mitigation measures, including PIR (passive infrared) sensors, and the use of external lighting will be subject to appropriate planning conditions.
- 7.37. Overall, it is acknowledged that the site suffers from constraints and contributes negatively towards the amenity of neighbouring occupiers, however the Applicant has demonstrated within this Application that the Proposed Development will improve on the existing condition through a more appropriate use of the Site, and planning conditions and mitigative measures to ensure that surrounding amenity is respected.

### **Principle of Demolition**

- 7.38. NPPF Paragraph 157 states that *'the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*
- 7.39. Local Plan Policy CC1 states that the Council will *'require all development 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.'*
- 7.40. Parts E and F of Policy CC1 requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and expect all developments to optimise resource efficiency.
- 7.41. The Applicant team have undertaken extensive work at pre-application stage to explore possibilities for the retention, refit, or minor refurbishment of the existing building, in accordance with the established hierarchy in GLA and LBC guidance. Further detail and a visual guide to the design options considered are set out in Section 3 of the Design and Access Statement.

- 7.42. The existing building, with its low ceiling heights, multiple level changes, and a small column grid, significantly limits the potential for the re-use or conversion of the space, which has been demonstrated and agreed with Officers. The premises are of poor quality when assessed against contemporary standards for office building but more importantly, they present low refit opportunity and future flexibility as demonstrated by the points below:
- Current fire escape arrangements do not conform to modern fire regulations.
  - Poor quality facade and windows. These do not comply with modern U-values and overheating Part L requirements.
  - Current plant provision results in an inefficient building in terms of energy use. This means a high rate of operational carbon per sqm per year continues to be emitted.
  - Existing WC provision does not meet modern office expectations.
  - Existing lifts need to be investigated to determine whether they comply with Part M / accessibility requirements.
- 7.43. A refit of the building would be insufficient to cover the fundamental works required for this building to be a commercial building, therefore has been discounted. Retrofit of the building would create numerous problems, namely a scheme that would fail to meet the standards of modern commercial/office space, characterized by inadequate daylight and a poor performance in carbon and energy terms, and would have low potential for future reuse. As a result, retrofit has been discounted.
- 7.44. As the building is split into three sections, a substantial refurbishment and extension would need to take out the middle core of the building and replace it with an extension, aligning the floor plans and adding two floors above. Columns would be removed and replaced with beams to provide support, and the middle section would be 'stitched' to the floors around it. The fundamental issue with this option is that the intervention required would be significant, resulting in overall emissions comparable to a full demolition and rebuild, and would result in a building with small grids and low floor to ceiling heights, a low quality and poorly performing office floorspace in terms of energy and sustainability, and poor potential for future reuse. As a result, this option has been discounted.
- 7.45. Following a consideration and discounting of three alternative intervention options, the proposed demolition of the existing building and redevelopment of the Site is justified in practical terms, and, on a wider level, will allow for the delivery of flexible, high quality floorspace, operational

performance, and benefits that would not have been achievable through other options within the hierarchy. Nonetheless, the Applicant team has sought to reduce overall emissions through the retention of foundations from the existing building, and will seek to reuse and recycle materials from the existing building where possible, as detailed within the Circular Economy Statement.

- 7.46. As set out above, the principle of demolition is considered to be fully justified in policy terms, and has been agreed as such with Camden and GLA Officers at pre-application stage

### **Townscape, Heritage, and Visual Impact**

- 7.47. Paragraph 135(c) of the NPPF states that developments should be “sympathetic to local character and history, including the surrounding built environment”, and the NPPF goes on to stress ‘great weight should be given to an asset’s conservation.’

- 7.48. Paragraphs 206-208 of the NPPF establish the criteria to be applied to development where harm would be caused to heritage assets:

*206. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

*207. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*

*d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

*208. 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.*

- 7.49. This approach is echoed in London Plan 2021 Policy HC1, which seeks to ensure development does not result in harm to heritage assets or their surroundings. Likewise, London Plan 2021 Policies HC3 and HC4 seek to ensure that development does not cause any adverse impact to the views identified in the London View Management Framework.
- 7.50. Local Plan Policy D1 and D2 seek to preserve and enhance Camden’s heritage, requiring development to sensitively respect the surrounding historic assets, and avoid causing harm to any heritage assets or Conservation Areas.
- 7.51. The Proposed Development lies within the Hatton Garden Conservation Area. The THVIA submitted in support of this application concludes that the character and appearance of the Conservation Area would be enhanced by the high-quality proposed development, which would also preserve the character and appearance of the setting, and remove the negative contribution of the existing building. The THVIA concludes that the Proposed Development would not harm the heritage significance of any listed structures or non-designated positive contributors to the Hatton Garden Conservation Area included in the assessment. As such the proposed development is in accordance with the NPPF, the London Plan Local Plan Policies D1 and D2 in respect of the impact of the proposed development on heritage.

#### **Daylight/Sunlight**

- 7.52. NPPF paragraph 135, part F states that developments should maintain a high standard of amenity for existing and future users. London Plan 2021 Policy D6 provides further clarity, stating “the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space”. Local Plan Policy A1(f) and paragraph 6.5 sets out that Camden will consider the impact on Daylight/Sunlight from proposed developments

when deliberating whether to grant planning permission. Paragraph 6.5 establishes that Camden will use the most recent BRE guidance when making this consideration.

- 7.53. The Daylight and Sunlight Assessment submitted in support of this application has assessed the impact of the Proposed Development in terms of daylight and sunlight on surrounding windows, and sunlight in surrounding amenity spaces.
- 7.54. The technical analysis demonstrates that 83% of the windows assessed will adhere to the BRE Guidelines for VSC. In terms of NSL, 91% will adhere to the BRE criteria while 96% of the rooms assessed will adhere to the BRE Guidelines for APSH.
- 7.55. The only properties identified as likely to experience any noticeable alterations in daylight and sunlight are Ziggurat Building to the north, and Da Vinci House to the south of the Site. The remaining properties will all either full comply with the BRE guideline numerical targets, or in the case of 81-89 Farringdon Road experience a single minor deviation from the targets in respect of one room, such that the alteration is unlikely to be perceptible.
- 7.56. For the Ziggurat Building, the only effects arise in terms of the VSC form of assessment, with the NSL daylight distribution results demonstrating full compliance and the APSH sunlight results indicating a virtually compliant position with the exception of three fractional transgressions. In almost all cases, whilst there are relative reductions in VSC that exceed the BRE numerical targets, because of the very narrow street and current building to building relationships, the existing VSC levels are already low such that even small changes can manifest as disproportionately higher relative reductions.
- 7.57. When examining the retained VSC levels, the absolute losses are generally small and the retained levels are consistent with what is presently being experienced by other residents within the building. Therefore, combined with the very good NSL and APSH results, the Proposed Development is not considered to give rise to an unacceptable degree of harm to this building.
- 7.58. In regard to Da Vinci House, whilst it is recognised that there will be some alterations in daylight to some flats, the VSC results indicate that the vast majority of these will be within 10% of the BRE numerical targets and therefore considered minor adverse. Where a handful of more noticeable reductions arise, the retained levels of VSC remain consistent with what is currently being enjoyed elsewhere around the Site.

- 7.59. The NSL Daylight Distribution results show that the majority of flats will retain BRE compliant levels with only 2 of the 15 flats experiencing a more noticeable degree of change, but will continue to retain reasonable levels of daylight within the rooms in the context of an urban location.
- 7.60. Overall, the scheme performs well from a daylight, sunlight and overshadowing perspective and has been consciously designed to minimise effects upon surrounding properties. While the proposals will result in some alterations in daylight and sunlight to some of the surrounding properties, the retained levels are generally commensurate with this locality and any residual impacts are indicative of what one would expect when developing a scheme within a Central London location. On balance and taking into account all of the contextual factors pertinent to this site, it is our view that the daylight, sunlight and overshadowing position should be considered acceptable.

### **Transport**

- 7.61. Chapter 9 of the NPPF is dedicated to promoting sustainable transport. Within the chapter, the following requirements are established from development (paragraph 116):
- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
  - Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
  - create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
  - Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
  - be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

- 7.62. Chapter 10 of the London Plan 2021 is dedicated to transport. London Plan 2021 Policy T1 establishes the main targets, which aim to ensure 80% of all trips in London are made by foot, cycle or public transport by 2041. In support of this London Plan 2021 Policy T4 requires development to reflect and be integrated with current and planned transport access, capacity and connectivity, which should be demonstrated through Transport Assessments.
- 7.63. London Plan 2021 Policy T2 establishes the ‘Healthy Streets Approach’ and requires development to demonstrate how they will improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.
- 7.64. London Plan 2021 Policy T5 establishes minimum requirements for cycle parking and requires cycle parking to be designed and laid out in accordance with London Cycling Design Standards. The relevant required standards are as follows:

Use Class	Long Stay	Short Stay
A2-A5 (Now Class E) Restaurants and Cafes	1 space per 175 sqm GEA	1 space per 20 sqm GEA
B1 (Now Class E) Business Offices	1 space per 75 sqm GEA	1 space per 500 sqm GEA for the first 5,000 sqm, with 1 space per 5,000 sqm GEA thereafter

**Table 7.1: London Plan 2021 Cycle Parking Minimum Standards**

- 7.65. Camden’s Local Plan and ‘Transport’ CPG (2021) builds on the requirements of the London Plan, requiring ‘developments to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan. The Council will also seek an additional 20% of spaces over and above the London Plan standard to support the expected future growth of cycling for those that live and work in Camden.’
- 7.66. The Transport CPG goes on to encourage the safe, secure and accessible location of cycle parking and facilities, stating that ‘cycle parking should be provided off-street, within the boundary of the site and close to the site entrance. Cycle parking needs to be accessible (in that everyone who uses

*a cycle can easily store and remove it from the cycle parking) and secure (in that both wheels and the frame can easily be locked to the stand). Security is a critical concern and careful consideration must be given to the location, design, enclosure and surveillance of all cycle parking.'*

- 7.67. The Proposed Development seeks to deliver both long-stay and short-stay cycle parking in line with the London Plan and Camden's Local Plan requirements, delivering 205 long-stay cycle parking spaces at lower ground floor level for the office space, accessible from both a cycle lift and a cycle stair with a cycle ramp; and 18 short-stay cycle parking spaces in the form of 9 Sheffield stands, located on St Cross Street as part of the new public realm proposals to the south of the Site.
- 7.68. It is acknowledged that the Proposed Development provides a slightly lower provision against the standards in terms of short stay cycle parking, however, due to the typically constrained local highway network and inability to offer short-stay cycle parking within the café unit itself due to its size, it is considered that the approach to delivering short-stay cycle parking for 18 cycles is a suitable provision contextually that benefits the public realm and streetscape by avoiding clutter.
- 7.69. London Plan 2021 Policy T6 establishes that development should be car-free in the CAZ and Opportunity Areas, except for disabled parking spaces. This is reiterated in Policies T6.2 and T6.3, which apply to standard office parking, and maintain that development should be car free.
- 7.70. Local Plan Policy T2 states that Camden will limit the availability of parking and '*require all new developments in the borough to be car-free.*' Part C of the Policy goes on to state that Camden will support the redevelopment of existing car parks for alternative uses.
- 7.71. The Proposed Development will not provide any car parking spaces, fully complying with London Plan and Local Plan Policies. With a reduction of 353 car parking spaces from the existing building, the proposals fully align with the aim of Policy T2 with the redevelopment of sites in central, publicly accessible locations to promote more sustainable means of travel.
- 7.72. Whilst the Proposed Development comes forward as car-free, should it be requested by LBC, the Applicant is willing to provide the appropriate financial contribution towards the delivery of an on-street blue-badge parking bay to provide accessible parking for future Site users. The Applicant met with LBC Transport Officers on the 4<sup>th</sup> October 2023, where it was agreed that the disabled bay could be introduced by the Council if demand arises in the future, and would be secured through the Section 106 accordingly.



- 7.73. As shown in the Transport Assessment, the Site has a PTAL rating of 6b, which is the highest possible standard, demonstrating that the Site is well served by public transport, with close connections to Underground stations and bus stops. The Site is also well connected to the existing cycle network with excellent access to the strategic cycle network. As a result, the removal of the existing car parking spaces should not be seen as placing any unsupportable demand on parking spaces in the vicinity, as the level of public transport and cycling facilities mean that occupants and employees of the building are unlikely to commute by car.
- 7.74. Delivery and Servicing is another key policy consideration at regional and local level. London Plan 2021 Policy T7 requires development proposals to facilitate safe, clean and efficient delivery and servicing, with adequate off-street loading bays to be provided where possible.
- 7.75. The Proposed Development will, in a similar manner to the existing building, utilise existing on-street kerbside locations for the undertaking of deliveries, as agreed during pre-application discussions with LBC. The Development will receive deliveries via the section of single yellow kerbside which is present within 10m of the Site on Saffron Street. This will provide a short transfer distance of goods between vehicles on-street and the back of house entrance to the Site.
- 7.76. The Proposed Development is anticipated to generate approximately 30 deliveries per day, which is a 27-delivery increase compared to the existing Site. In terms of vehicle trip generation more generally, it is important to consider that the removal of the existing car park will result in a significant overall reduction in vehicle movements, with any increase in servicing demand associated with the Proposed Development being offset by this. The delivery and servicing strategy of the Proposed Development has been discussed with Camden Transport Officers at pre-application meetings and has been agreed as appropriate on this basis.
- 7.77. As shown by the above, the Proposed Development incorporates a considered, appropriate transport strategy, and should receive policy support on this basis.

### **Air Quality**

- 7.78. Air Quality is a material consideration for development at all spatial levels. In paragraph 170, the NPPF states that “Planning policies and decisions should contribute to and enhance the natural and local environment by: preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water

or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality”. This is echoed by London Plan 2021 policy SI1, which seeks for developments to be Air Quality Neutral, and states that “developments will minimise emissions of air pollution from both static and traffic generated sources”. Local Plan Policy CC4 sets out that LBC will ensure the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

- 7.79. The Air Quality Assessment Addendum submitted in support of this application concludes that the overall impact on air quality, following proposed mitigation measures, will be insignificant, and as such the Proposed Development is in accordance with National, Regional and Local Policy in terms of air quality.

### **Energy/Sustainability**

- 7.80. Chapter 14 of the NPPF focusses on the need for new development to be sustainable and low carbon. Amongst other requirements, development is encouraged to reduce greenhouse gas emissions, such as through its location, orientation and design, and by drawing its energy supply from decentralised, renewable or low carbon energy supply systems.
- 7.81. This is further defined by London Plan 2021 Policy SI2, which establishes set emission targets for developments to meet. Policy SI2 contains a requirement for non-residential development to reduce CO<sub>2</sub> emission by at least 35% below Building Regulations Part L 2013. London Plan 2021 Policy SI2 also requires development to follow an ‘Energy Hierarchy’ of methods used to reduce energy consumption, which comprise using less energy (Be Lean), supplying energy more efficiently (Be Clean), and using renewable energy (Be Green), listed in order of priority.
- 7.82. The Energy Statement submitted in support of the application provides details of the proposed energy efficiency measures and Low Carbon Technologies which will be implemented to achieve a 15% reduction in CO<sub>2</sub> Emissions over current Part L of the Building Regulations.
- 7.83. Passive design and building efficiency has been identified as the most effective route for achieving significant energy demand savings and this approach provides a 17.06% reduction in heating energy demands over the minimum requirements of Part L 2021, and enables a displacement ventilation system with Air Source Heat Pump systems to deliver Space heating and a Water Source Heat Pump to deliver DHW.

- 7.84. Whilst London Plan establishes a minimum target of 20% energy reduction through ‘Be Green’ measures, the Proposed Development will achieve a 21.97% reduction through a combination of PV panels, Air Source Heat Pumps, and other renewable measures.
- 7.85. The strong performance of the Proposed Development exceeds the planning policy requirement of a 35% reduction against Part L, in terms of ‘Be Lean’, ‘Be Green’ and overall, achieving an overall score of 35.28% underlining its sustainable credentials and demonstrating its alignment and exceedance of policy guidelines. Therefore, in terms of energy and sustainability, this application should be supported.

#### **Noise/Vibration**

- 7.86. Paragraph 180 of the NPPF states that “new development should mitigate and reduce to a minimum potential adverse impact resulting from noise, and avoid noise giving rise to significant adverse impacts on health and quality of life”. London Plan 2021 Policy D14 draw parallels with this, requiring development to avoid adverse noise impacts from new development and preserve the acoustic environment. Local Plan Policy A4 sets out that the Council will seek to ensure that noise and vibration is controlled and managed and LBC will not grant planning permission for developments likely to generate unacceptable noise and vibration impacts or development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided.
- 7.87. The Noise and Vibration assessment prepared by Sandy Brown in support of this application demonstrates that noise levels can be sufficiently controlled during construction and operation of the development, so that a high-quality acoustic environment is maintained for all future occupants, and surrounding receptors. The Noise and Vibration Assessment sets out appropriate noise limits for the plant based on background noise levels in the locality, which can be limited via planning condition.
- 7.88. Appropriate conditions will be placed on the planning permission to prevent adverse impacts on surrounding amenity from building users, including a prevention on loud music being played, large gatherings, or the use of the terrace outside of certain hours.
- 7.89. As such, the Proposed Development is in accordance with planning policy in respect of noise.

**Nature Conservation and Biodiversity**

- 7.90. Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain from 12<sup>th</sup> February 2024.
- 7.91. Local Plan Policy A3 sets out that LBC will seek to preserve and enhance biodiverse features through development, including the assessment of developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 7.92. A Biodiversity Net Gain assessment has been carried out as part of the planning application, and calculated that the proposed development is likely to lead to a net gain of 0.30 biodiversity units, through the installation of green features on terrace and roof levels and within the public realm. As the baseline value of the Site is negligible, with a Nil score attributed, the Proposed Development constitutes a net gain percentage of 100% in habitat units within the metric, thus achieving full compliance with the aims of the Environment Act 2021 and Local Plan policy. Securing the ongoing maintenance of this uplift will be secured by planning condition or S106 obligation as provided for in the Environment Act 2021.
- 7.93. Policy G5 of the London Plan 2021 states that ‘Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.’
- 7.94. Expanding on this, Policy G5 states that the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. Given there is no residential use proposed as part of the Proposed Development, a UGF score of 0.3 is therefore attributable.
- 7.95. The Urban Greening Factor for the Proposed Development is 0.31, exceeding the target established in the London Plan through a combination of high-quality green roof accommodating wildflower and sedum, green wall, and ground floor planters and urban trees in the public realm.

- 7.96. To conclude, the Proposed Development fully complies with national, regional and local policy in terms of biodiversity and urban greening, and represents a significant improvement on the complete lack of such features on the existing site.

### **Health and Wellbeing**

- 7.97. Local Plan Policy C1 sets out that LBC will promote healthy communities with measures to help contribute to healthier communities to be incorporated in a development where appropriate. Local Plan Policy C1 requires proposals for major development proposals to include a Health Impact Assessment (HIA).

- 7.98. In accordance with the requirements of Policy C1, a Health Impact Assessment has been prepared by Hatch Regeneris and accompanies the planning application submission. The assessment concludes that no significant health impacts resulting from the development have been identified and that the proposed development will have a neutral or positive impact across all 11 categories set by the Healthy Urban Development Unit (“HUDU”). The Health Impact Assessment has also identified several positive health impacts that can be broadly summarised as follows:

- Improved accessibility and travel;
- Access to work and training, and a positive contribution to construction and permanent employment opportunities.
- Contribution to social cohesion through improved street and space design;
- Positive response to climate change issues.

### **Basements**

- 7.99. Local Plan Policy A5 sets out that LBC will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to neighbouring properties; the structural, ground, or water conditions of the area; the character and amenity of the area; the architectural character of the building; and the significance of heritage assets.
- 7.100. Policy A5 states that, in determining proposals for basements and other underground development, the Council will require an assessment of the development proposal’s impact on

drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment.

- 7.101. The proposed development comprises a single storey basement. The planning application is, in accordance with Policy A5, accompanied by a Basement Impact Assessment, prepared by HTS. The Impact Assessment considers the relationship of the proposed basement with neighbouring properties, structural stability and impact on drainage, flooding and groundwater conditions.
- 7.102. The proposed basement is part of a comprehensively planned site, and it has been demonstrated in the accompanying Basement Impact Assessment, and other supporting documentation, that the construction of it will not harm neighbouring properties or structural, ground or water conditions of the area. As such the proposed development is in accordance with Local Plan Policy A5 in respect of the proposed basement.

## 8. CONCLUSIONS

- 8.1 The Proposed Development will deliver a substantial quantum of high quality office space and affordable workspace in a CAZ location, provide enhancements to the landscaping and pedestrian experience, and create a sustainable new building that will make a more positive contribution to the conservation area.
- 8.2 The Proposed Development fully accords with planning policy and will provide a wide range of planning benefits whilst causing minimal impact.
- 8.3 The design has been carefully considered to provide a building which enhances the surrounding townscape, and achieves better synchrony with the neighbouring buildings, and the historical context of the Conservation Area. Active frontages will be enhanced on all aspects of the building, befitting the CAZ location and improving natural surveillance, whilst the introduction of the pocket park on St Cross Street will provide much needed green space within the area, enhancing the pedestrian experience. The design has received strong support from both the Design Review Panel and LBC Officers during pre-application.
- 8.4 The Proposed Development encompasses the following key features:
- Activated frontage on all aspects of the Site, including a café/restaurant at ground floor level;
  - Carefully crafted architecture and materiality to better respond to and enhance the surrounding townscape and Conservation Area;
  - 586sqm of Affordable workspace, with a dedicated entrance at ground level.
  - Enhanced and expanded office space in a CAZ location and the intensification of a highly accessible central London site;
  - Flexible floorplates, allowing the site to maximise its potential and ensure the building's continued use;
  - Policy compliant levels of cycle parking and facilities, encouraging sustainable transport for occupants and visitors.

- Public realm improvements through the widening of pedestrian routes and the creation of a pocket park on St Cross Street.
- Strong Energy and Sustainability Credentials, achieving BREEAM 'Excellent' and exceeding 35% reduction against Part L 2021.

8.5 In summary, the Proposed Development will provide a range of planning benefits and a better alignment with the local context than the existing and consented buildings. The design has been configured to minimise any impacts from the development and has been informed through productive engagement with LBC officers and the Camden Design Review Panel. In light of the above, planning permission should be granted for the Proposed Development.