

Application ref: 2023/0513/PRE
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Mike Moon

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Dear Sir/Madam

Pre-application Medium Development Pre-application Advice Issued

Address:

NCP London Saffron Hill
14 St Cross Street
London
EC1N 8UN

Proposal: Demolition and redevelopment of current NCP Car Park and erect a new office building (Class E).

Drawing Nos: Saffron Hill Pre-App Introduction Document (R002), Cover Letter (02/02/2023)

Site constraints

- Hatton Garden Conservation Area
- Article 4 for Basements
- Article 4 for C3 CAZ KQ
- Central London Area
- Central London Local Area
- Hatton Garden Local Centre
- Strategic View Background/Cone/Wider Setting
- Underground development constraint - Slope Stability
- Underground development constraint – Subterranean (groundwater) flow

Relevant planning history

N/A

Relevant policies and guidance

National Planning Policy Framework (NPPF) 2021

The London Plan 2021

Camden Local Plan 2017

Policy A1 Managing the impact of development

Policy A3 Biodiversity

Policy A5 Basements

Policy D1 Design

Policy D2 Heritage

Policy G1 Delivery and location of growth

Policy H1 Maximising housing supply

Policy H4 Maximising contribution to affordable housing

Policy H2 Maximising the supply of self-contained housing from mixed use schemes

Policy H6 Housing choice and mix

Policy C1 Health and Wellbeing

Policy C2 Community Facilities

Policy C6 Access for all

Policy E1 Economic Development

Policy E2 Employment premises and sites

Policy CC1 Climate Change Mitigation

Policy CC2 Adapting to Climate Change

Policy CC3 Water and flooding

Policy CC5 Waste

Policy DM1 Delivery and monitoring

Camden Planning Guidance

Amenity CPG 2021

Design CPG 2021

Energy efficiency and adaptation CPG 2021

Employment Sites and Business premises CPG 2021

Housing CPG

Transport CPG 2021

Water and Flooding CPG

Hatton Garden Conservation Area Appraisal and Management Strategy (2009)

Site and Surroundings

The site is located within Hatton Garden Conservation Area. Established in 2017, the Conservation area is characterised as mixed with specialist retail, industrial and also residential buildings. The area has an intricate street pattern and the area designation is designed to protect the special qualities and character as the heart of London's Jewellery trade.

ASSESSMENT

The principal planning considerations are the following:

- Change of use/ Land use
- Demolition

- Design and Heritage
- Neighbouring amenity
- Transport
- Energy and sustainability

1. Change of use

Policy T2 (concerned with parking and car-free development) confirms that we will support the development of existing car parks for alternative uses. London Plan policy T6 (Car Parking) also supports Car Free development which includes no general parking. Furthermore policy SD7 (Town centres: development principles and Development Plan Documents) recognises the importance and capacity of car park sites for redevelopment to provide mixed use development

Local Plan Policy G1 supports delivery of both homes, jobs and infrastructure. It expects development to make the best use of its site, and seeks a mix of uses including self-contained housing where possible and appropriate. Growth is expected to be concentrated in identified growth areas and across Central London.

Local Plan Policy E1 directs development of new office development to the growth areas, Central London and the town centres. The site is not in an identified Camden growth area, but obviously is in Central London Area, and located close to the new Elizabeth Line station at Farringdon, which is an area of employment intensification in adjoining parts of LB Islington and the City of London.

Policy E1 also promotes the Knowledge Quarter and associated growth sectors, including science. The Knowledge Quarter is focussed around King's Cross Station, but includes organisations as far as a mile away, encompassing the part of Central London within LB Camden. The draft Camden Site Allocations Local Plan Feb 2020 sets out the Council's emerging priorities for the Knowledge Quarter, which include floorspace suitable for life sciences, digital collections and machine learning, lab-enabled space, workspace suitable for start-ups and move-on businesses, and an element of affordable workspace. As a general direction and without any other detail, affordability is key – the preference would be for less space at a meaningful discount.

Policy E1 also indicates that we will promote and protect the jewellery industry in Hatton Garden. The Hatton Garden area boundary is shown on the Policies Map and encompasses the site.



Policy E2 indicates that *"Where proposals in Hatton Garden would increase total gross internal floorspace by more than 200sqm, we will seek 50% of the additional floorspace as affordable premises suitable for the jewellery sector."*

More detail on the operation of this policy is provided in Local Plan paragraph 5.52 and paragraphs 21 to 22 of our SPD *Camden Planning Guidance: Employment sites and business premises*. If your proposal includes an addition of 200 sqm or more compared with the floor area of the existing car park and offices, you will trigger this requirement.

The Borough-wide priority land use of the Local Plan is self-contained housing, and is set out in Local Plan Policy H1. Furthermore, Policy H1 also indicates that we will seek exceed housing targets by: (d) *"where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site"*.

Further to our discussion around Student housing, there is no requirement for all the student housing to be linked to a specific University, but we require it to serve the 20 or so Universities in Camden and adjoining boroughs, and there must be agreements with one or more Universities for the *affordable* element (London Plan target 35%). More information can be found in the Student Housing CPG.

Given the scale of the site and the three street frontages, we consider that the site is capable of delivering a mix of uses and feel that this should be explored during the pre application process.

We note that there are two floors of office space within the existing building. Consequently, Policy E2 applies, which seeks to protect existing business provision, and supports higher intensity redevelopment increasing the level of employment floorspace. However, in these circumstances Policy E2 also seeks floorspace for start-ups and SMEs, and managed affordable workspace, and also seeks inclusion of other priority uses including housing.

In the context of this site's location in Hatton Garden, jewellery workshop space will be the Council's first priority for any secondary use, and our preferred form of affordable workspace.

Bearing in mind the requirements of Local Plan Policy H1, we would strongly encourage the provision of self-contained housing as part of the mix of uses. This could potentially take the form of build to rent development, but development for short-stay accommodation (lets of fewer than 90 days) will be resisted.

In assessing the suitability of any particular use of mix of uses proposed for the site, we will take account of:

- which uses are best able to make use of the fabric and/ or structure of the existing building;
- the space needs of any identified end-user;
- evidence of the space needs of Camden's identified growth sectors, the Knowledge Quarter, and businesses operating in the vicinity of the Hatton Garden area;
- the impact of a mix of uses on the efficiency and overall quantum of development, and any demonstrable obstacles to the provision of a range of uses on the site;
- any demonstrable conflict between the priority uses identified by the Council or demonstrable conflict with other uses present in the immediate vicinity;
- the financial viability of the development; and
- the extent to which the proposed development and uses will meet the priorities of and deliver the public benefits sought by the Local Plan.

2. Demolition

The principle of demolition is assessed in terms of both conservation/heritage impacts and energy/sustainability. Heritage considerations are discussed in more detail in section 3 below.

In terms of energy and sustainability, Policy CC1 (Climate Change Mitigation), in particular points (e) and (f), requires all proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building. Paragraph 8.16 of the Local Plan describes how the construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retrofitting buildings must always be strongly considered before demolition is proposed.

What is also an important factor is that this is a functioning mixed use building already; it isn't vacant and is well used throughout the site.

Applicants are expected to submit a condition and feasibility study and an options appraisal to demonstrate that a full assessment of all options to retain and improve the existing building have been considered, and allow officers to fully assess the existing condition of the building.

The information provides analysis on heritage value, and the existing building. For ease of assessment, I recommend that the information provided by the applicant is set out following the table structure in the CPG and divided by parts of the site. The categories are listed below

1. Existing building uses

Officer assessment required as to the existing use of the building – potential for other uses – what works / doesn't work.

2. Servicing (summary of MEP; lifespan of plant)

MEP review indicates what needs replacing, upgrading, and new services to comply with regulations. Most of which is assumed capable within a refurbishment or refurb / part extend / demolition option – this however needs to be clarified.

3. Technical (required upgrades; material audit; loading capacity of structural frame; energy performance)

4. Site capacity

To be considered as part of officer assessment – what is achievable on the site, the optimal site capacity – has this already been reached?

Development options

The CPG states that “Taking into account the condition of the existing building and feasibility of re-use above, the following hierarchy should be used to explore all potential options of an existing site, with the aim of optimising resource efficiency” (paragraphs 9.9 – 9.12).

9.6 goes on to state “All options should achieve maximum possible reductions for carbon dioxide emissions and include adaptation measures, in accordance with the Council’s Development Plan and this CPG. I. Refit II. Refurbish III. Substantial refurbishment and extension IV. Reclaim and recycle.”

Page 46 of the CPG explains what options need to be explored before finishing up at demolition. These are listed below:

- I. Refit
- II. Refurbish
- III. Substantial refurbishment and extension
- IV. Reclaim and recycle

Whilst providing feasibility and condition surveys are a crucial element these options need to be fully explored and supported by detailed justification of how the project has moved down this hierarchy.

You are also advised to consult GLA guidance. The final draft of the GLA's Circular Economy Statements Guidance has recently been published which states that "If there are existing buildings on a site, a third-party, independently verified or peer-reviewed pre-redevelopment audit is strongly encouraged, including analysis that fully explores options for retaining existing structures, materials and the fabric of existing buildings into the new development; and the potential to refurbish buildings before considering substantial demolition."

Also from the CES Guidance:

If substantial demolition is proposed, the pre-demolition audit should include the following core information:

• *An explanation as to why it is proposed that the building(s) be demolished. Applicants should explain the different considerations for developing the site. This should go beyond simply saying that the buildings are of 'low quality'. Justification for demolition should be provided, in line with the approach set out in sections 2.4.3 to 2.4.5, above. An assessment of carbon impacts should be highlighted and, where relevant, the WLC assessment should be cross-referenced. It should be explained how any negative impacts resulting from demolition, such as the loss of embodied carbon in existing buildings, would be mitigated and offset.*

It is only where the principle of demolition is accepted, that proposals would then be required to be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building. Where the principle of demolition is accepted, you would also be required to submit:

- Whole Life Carbon Assessment
- Resource efficiency plan
- Circular economy statement (required for referable applications)
- Pre-demolition audit

It is necessary to understand resource efficiency when comparing the overall impact of a new development with that of refurbishing an existing building. The stages to assess include:

- production of materials and components (raw material extraction, material production, wastage and waste processing, transportation)
- construction stage (transport, storage of products, wastage and waste processing, energy and water use in construction, ancillary materials)
- use stage (energy and water used in operation, maintenance, repair, replacement and refurbishment)
- end of life stage (de-construction or demolition, transport, waste processing, disposal of waste).

When comparing the carbon impacts of a new development and a refurbished scheme, the applicant should include the following within the scope of the assessment:

Refurbished scheme	New development
Embodied carbon of any <u>new</u> materials used within the refurbishment (do not include the carbon content of the existing building materials as these are considered 'spent').	Embodied carbon of all materials used within the development.
Expected operational carbon emissions of the refurbished scheme over the expected lifetime of the building (60 years is typical)	Expected operational carbon emissions from the new scheme over the expected lifetime of the building (60 years is typical)

Embodied carbon is calculated by finding the quantity of all materials needed for the building's lifetime and multiplying this by the carbon factor (expressed in kg CO₂e per kg of material/product) for each material to produce the embodied carbon figure. Please refer to policy CC1(e) and CPG Energy efficiency and adaptation.

Where the demolition of a building cannot be avoided, we will also expect developments to divert 95% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site.

3. Design and Heritage

Local Plan policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. The site is not listed and listed as a negative contributor.

The site has three elevations and therefore there is an opportunity to treat each elevation differently which can also link with the uses. Whilst the site and character of area lends itself for a flexible approach to the design of any new building, it is important to note that part of the reason why this building is listed as a negative contributor is that it disrupts the finer grain character of the area and takes up a substantially sized plot. Overcoming this aspect should be an important aspect of the design process.

4. Neighbouring Amenity

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include visual privacy, outlook; sunlight, daylight, and overshadowing; artificial lighting levels; noise and vibration; odour, fumes, and dust; and impacts of the construction phase, including the use of Construction Management Plans.

Again the design has not been developed yet but it is important to note there are residential buildings along Saffron Street within close proximity. In fact all buildings surrounding the plot are within close proximity and so the design should incorporate measures to reduce the impact on neighbouring amenity.

CONCLUSION

Since the application is in early stages and a full report was not required by the applicant and more general comments have been provided. Officers look forward to working closely with the applicants to ensure that the full potential of this site is achieved.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable, nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries about the above letter or the attached document, please do not hesitate to contact **Ewan Campbell**

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