

Application ref: 2023/2546/PRE
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Date: 08/09/2023

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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).

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

This report covers the development of the scheme through meeting 2, 3 and 4 covering issues of land use, demolition, design, active ground floor uses, and transport and energy efficiency. The pre-app report is aiming to document the scheme's development and clearly set out the timeline for its development. Previous advice was issued under 2023/0513/PRE

The principal planning considerations are the following:

- Land use
- Demolition
- Design and Heritage
- Neighbouring amenity
- Transport
- Energy and sustainability

1. Land 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. Since the previous meetings and establishing the principle for demolition the loss of the car park is considered acceptable

As stated in the report under pre-app 2023/0513/PRE, policies E1 and E2 support the new office development within this area and support the provision of affordable workspace within this area with Policy E2 indicating that "Where proposals in Hatton Garden would increase total gross internal floor space by more than 200sqm, we will seek 50% of the additional floor space 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

The Borough-wide priority land use of the Local Plan is self-contained housing, and is set out in Local Plan Policy H1. The policy indicates that we will seek meet 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". It is important to note that the policy does recommend housing schemes to be focused in the Central London Area as it does have existing access to multiple amenities, transport links and areas of employment.

As has been discussed at the meetings, given the scale of the site and the three street frontages, Officers still consider that the site is capable of delivering a mix of uses and feel that this should be explored during the pre-application process. However, within meeting 2, 3, and 4, 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.

Currently, the Council is not convinced that housing cannot be included within this site but is also not convinced by the proposed scheme and how little it does to offset this concern. There has been very little in terms of information outlining the justification for a purely commercial scheme but also any sort of confirmation that affordable workspace / jewellery sector space will be included. As part of justifying demolition and a purely commercial land use the Council really needs to see some attention to what public benefit is provided in line with Planning Policy. Moving forward the scheme should include a meaningful affordable workspace package with a quality and sizeable activation on the ground floor.

Currently the case put forward for 'public benefit' is seemingly the provision of good quality cycle parking, a low carbon and energy efficient building and some sort of highway alterations. These are minimum expectations within a scheme that involves full demolition and so do not do much to overcome the concern. It is also worth pointing out that the acceptability of the highway alterations is not known at this stage and therefore may not be.

2. Demolition

The principle of demolition is assessed in terms of both conservation/heritage impacts and energy/sustainability considerations. 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.

Following the previous meeting the Council clearly outlined the expectations for providing the justification for demolition. For the second meeting the applicants submitted a condition and feasibility study and an options appraisal in order to demonstrate that a full assessment of all options to retain and improve the existing building have been considered.

Previously the Council recommended 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
2. Servicing (summary of MEP; lifespan of plant)
3. Technical (required upgrades; material audit; loading capacity of structural frame; energy performance)
4. Site capacity

Development options

Page 46 of the CPG also explained 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.

Following meetings, supporting documents have been submitted, which show different parts of the site in relation to the list. The documents outlined the condition of the building, the existing uses, information around servicing and the technical information. It was clear that the existing building levels are uninsulated and unheated. The facades are a mix of light-weight metal mesh and sheet materials meaning that is not secure or air tight. Moreover, the ceiling heights within the car park structure are typically c. 2.25m which are very low with the car park frame is split in three independent sections. A concrete car ramp wraps around the floor plan and connects the central portion of floor slab, which is half a floor higher than the flanking car park levels. The existing building demonstrated that the floor slabs were not flat and had inclinations. Furthermore the existing column grid is typically 4.3x4.9m and 6.5x4.9m which remains very small and provides limited opportunity to develop.

The existing offices are occupied by the car park operator, NCP. 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 m2 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.

Overall the condition of the building, commercially, is poor and the upgrades/alterations needed to make this just a functioning office building would be very significant. Following on from this it was accepted that the Council could look into the development options above.

Refit

As with the information above, simply refitting the building would not be enough to cover the fundamental works required for this building to be a commercial building.

Retrofit

The definition of retrofit is outlined below:

Refurbishment should seek to significantly improve the service life of the existing building. This option provides an opportunity to retrofit the building to reduce carbon emissions and include sustainable adaptation measures.

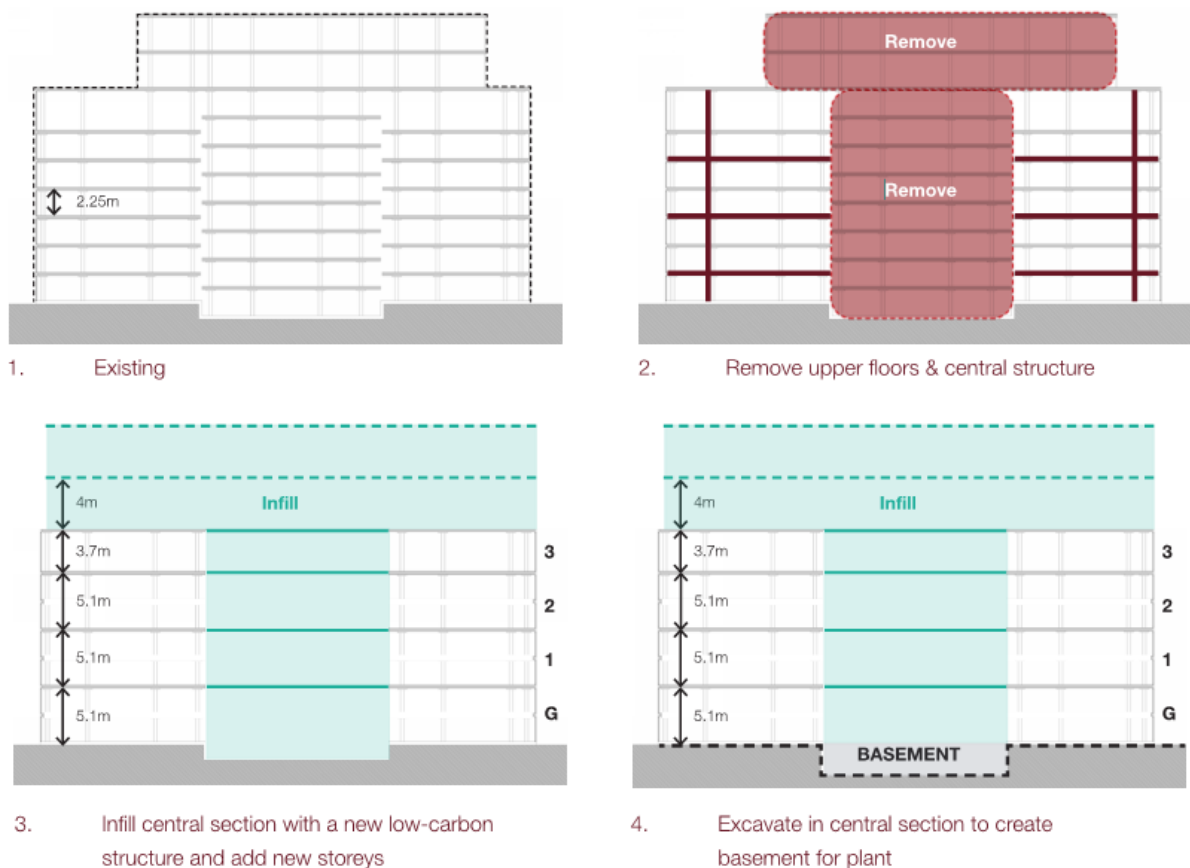
With this option there were still numerous problems and the result would be a scheme that would fail to meet the standards of modern commercial/office space, and would be characterized by inadequate daylight and a poor performance in carbon and energy terms.

With this level of 'refurbishment', the resulting building would still remain compromised and would offer limited scope for future flexibility and reuse.

Substantial refurbishment and extension

The definition of this option is similar to the above, but takes into consideration the need to optimise site capacity and alter the existing structure to meet future needs. This may involve significant changes to the façade (façade replacement) but should seek to retain as much of the existing building as possible reducing the need to use new materials and reduce the loss of embodied carbon in the existing structure.

As the building is split into three sections the refurb and extension naturally proposed to take out the middle core and replace with an extension, aligning the floor plans and adding a couple of floors above. The diagram below from the document demonstrates this.



With this option columns would be taken out and replaced with beams to improve support and part of the ramps would be reused for servicing and core-type uses the middle section would be 'stitched' to the floors around it.

The issue with substantial refurbishment is that the small grid, awkward ceiling height meaning that additions are difficult for the building. Furthermore the intervention would involve carbon intensive structural alterations that would remain compromised for future flexibility.

Reclaim and Recycle

The definition of this is listed below:

'Where it is demonstrated to the Councils satisfaction, that the above options are not feasible the development proposal should include a pre-demolition audit identifying all materials within the building and documenting how they will be managed. The preference should be for re-use on site, then re-use off site, re-manufacture or recycling. (Providing time in the project plan for selective deconstruction techniques and materials storage to maximise reuse). New London Plan policy SI7 expects 95% of construction and demolition waste to be diverted from landfill (reuse, recycle, recovery), and 95% of excavation waste to be put to beneficial use.'

With this option the potential for a flexible and optimized grid is obviously higher and the building floor plate becomes a lot more rationalised. What is important to mention is that for demolition compared with substantial refurbishment the predicted operational energy is lower than substantial refurbishment. Overall the justification for demolition has been established and now a detailed Whole Life Carbon Assessment will need to support any application. It is recommended that the analysis should run alongside the pre-application process to ensure that the embodied and operational carbon are in line with LETI guidance.

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 proposed building is contemporary and provides a strong architectural language around the site. The façade treatment is dictated by the buildings functionality and environmental approach with recessed bays, different window features, exposed soffits and a strong exoskeleton-type structure around it, designed to provide passive measures of cooling and shading. This language has broadly been supported and Council officers are comfortable that this represents a valid and high quality approach to the site and Conservation area. Whilst the design is not necessarily 'in keeping' with the older buildings of Hatton Garden, the area is characterised by difference, uniformity and change. Providing the design is kept at a high level then the design represent these characteristics well.

In terms of scale and massing, the past meetings have dealt with the façade detailing and lower ground. At this moment we have not seen a full schedule of floor plans or elevations and therefore it is difficult to make strong assessments on this topic. The Current Car Park is sizeable and the proposed building will slightly increase the massing and then step back and then be higher than existing. The principle of potentially adding an additional storeys and massing on what is existing is accepted but more details need to be provided in terms elevations and models to demonstrate how this will be designed because currently the Council has not seen these. This will also need to be tested in relation to amenity issues as discussed below. Therefore the acceptability of the proposed massing cannot be discussed until full plans have been provided.

In terms of the material palette, the construction and foundation materials are being driven by a low carbon design which is supported and welcomed. A mixture of low carbon concrete, CLT and steel has been proposed with the overall mix not decided upon. The Council is happy to be updated on this issue throughout the process and given detailed rationale for decision making. It is worth noting that due to the nature of the demolition the Council expects the construction materials to be of high quality and very sustainable.

The façade materials, like with the design have been driven by passive solar control and solar shading. The expressed structure helps with this and generally, this move is supported. The preference is to explore copper/bronze tones with options including natural steel, weathered steel or copper/bronze cladding. During the meetings it was discussed that more of the bronze tones were preferred which also provided a better carbon content and is therefore supported in terms of direction.

One other aspect which Officers would like to see further discussion on is the design and successful activation of the ground floor. Currently there are three entrances proposed from St Cross Street and Saffron Street which also incorporate the café entrance. The relationship with the café and entrance to the main part of the office is of significant concern with it being read like the reception rather than its separate unit. As part of successful ground floor activation the use of a café provides a public use in a location which would seemingly be successful. There is a danger that incorporating this café into part of the reception it would not be used by the public and would just be an extension of the reception and be 'inward'. From a building that has an active ground floor use it goes to a building which is actually quite closed off separate from the area. This is not something the Council want to achieve and creating this 'campus' mentality in this area will be resisted.

The entrances seem in rational locations and the entrance to the cycle store on ground floor is welcomed.

The design of the building on the upper floors has been looked at in some detail and there are multiple detailed design elements that creates a level of richness. The ground floor is very different to this with a strong stone material with pillars around the building. There has been multiple discussions on this and continuing the building's architectural language down to the ground floor was explored. Whilst this might not be the solution, the current iteration does not work appearing failing to relate to the building and changing the feel of the building at ground floor level. This element needs work and should be altered.

4. Transport

Policy T1 aims to promote sustainable transport by prioritising walking cycling and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities and finally improving links with public transport. All these measure are in place to ensure the Council meets their zero carbon targets.

Policy T2 limits the availability of parking in the borough and requires all new developments in the borough to be car free. This will be done through not issuing par permits, resisting development of boundary treatments and using legal agreements to secure these actions.

The proposals indicate that 136 cycle parking spaces for staff would be provided in a basement cycle store accessed from Saffron Street. The plans do not provide any dimensions and Officers initial view is that the access route to the cycle store looks too narrow. More detailed plans including dimensions of the proposed cycle store and the access route from Saffron Street should be provided during the pre-application process. Officers would like to see full floorplans to ensure that the proposed number of cycle parking spaces will be sufficient.

Proposals for long stay cycle parking spaces for staff and short stay cycle parking spaces for visitors would need to be designed in accordance with our CPG Transport document and Policy T5 (Cycling) of the London Plan. Please note that we expect visitor cycle parking facilities to be provided within the red line boundary as opposed to on the public highway. Whilst Officers appreciate that this will be difficult due to the building having whole site coverage, we would like the opportunity to discuss options further.

The proposal would result in the removal of 353 car parking spaces (figure obtained from the NCP website). This would be welcomed as it would help to reduce motor vehicle trips in the local area. The proposed development would be car-free except for any disabled parking requirements. However, due to the proposals, it is not considered that any disabled parking is proposed. Ideally, disabled parking spaces would be provided within the red line boundary as opposed to on the public highway. The applicant is advised to refer to our CPG Transport document and Policy T6 (Car Parking) of the London Plan when considering disabled parking requirements for the proposed uses.

The proposals indicate a number of external doors opening outwards on to the public highway. This would not be acceptable. Officers would expect this to be rectified at full planning application stage.

The developer indicates a willingness to work with the Council to improve the public realm in the vicinity of the site. This is welcomed as the public realm is not particularly attractive. There is an opportunity to improve the public realm on St Cross Street, Saffron Hill, and Saffron Street. Officers would welcome the opportunity to discuss potential improvements with the developer prior to a planning application being submitted. Initial ideas for discussion include:

- Pavement widening adjacent to the [St Cross Street frontage](#) (would need motorcycle parking bay to be relocated)
- Providing a raised table at the [junction of St Cross Street and Saffron Hill](#) in high quality material (e.g., granite setts)
- Closure of the [western section of Saffron Street](#) to motor vehicles between Onslow Street and Saffron Hill (would be pedestrians and cycles only) and provide a shared space surface in high quality material (e.g., granite setts)
- Extension of the [E-Scooter and Cycle Hire parking bay](#) on Saffron Hill (would result in the loss of 1 paid for parking space)

A transport assessment following TfL's Healthy Streets Approach will need to be prepared and submitted as part of any planning application. Please refer to our CPG Transport document and Policy T4 (Assessing and mitigating transport impacts) of the London Plan for guidance.

5. Energy and Sustainability

The Council requires 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. The Council promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met, including zero carbon development; and expects all developments to optimise resource efficiency. All major developments are required to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible, establishing a new network.

Policy CC1 requires all development to reduce carbon dioxide emissions by following the steps in the energy hierarchy; supports and encourages sensitive energy efficiency improvements to existing buildings; and expects all developments to optimise resource efficiency.

Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to secure a minimum 35% reduction in regulated CO₂ emissions below the maximum threshold allowed under Part L 2013. The Council expects zero carbon development, with at least 35% reduction to be made on-site. A carbon offset contribution would be required for the shortfall. This would be used to secure the delivery of carbon reduction measures elsewhere in the borough.

Developments are also expected to implement the sustainable design principles as noted in policy CC2 by achieving a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Policy CC2 requires all development to adopt appropriate climate change adaptation measures such as:

- A. the protection of existing green spaces and promoting new appropriate green infrastructure.
- B. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- C. incorporating bio-diverse roofs, combination green and blue roofs, and green walls where appropriate; and
- D. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

The development is classed as a major development (5-9 units / between > 1000 sqm) by *CPG Energy Efficiency and adaptation*. All major applications should demonstrate that they meet sustainable design principles, provide an energy statement and are also required to meet a target of Zero Carbon, minimum 35% reduction beyond Part L Building Regulations on site, with 10% reduction through on-site energy efficiency measures). There is also a requirement to reduce CO₂ from onsite renewables by 20% however it is an expectation that this is significantly exceeded.

The design already begins to include passive cooling measures and built in sustainability and energy efficiency measures which is welcomed and the design, as it develops should maintain this integration to a high level.

The Council will also seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures (policy

CC3).

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site.

Policies D1 and CC2 of the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. The inclusion of a green roof is therefore welcomed.

6. 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.

Since the previous report the design has been developed to include glazing on all elevations and stepped elevations to incorporate balconies. As stated previous the character of the area is a tight urban grain with small distances between buildings, some of which are residential.

There is a concern due to the increase in height and massing, certainly on the upper floors that there will be a significant impact on outlook, loss of sunlight and daylight and an increased sense of enclosure for the neighbouring buildings. There are residential buildings along St Cross Street and Saffron Street within close proximity and this aspect needs to be tested and built into the design. Not only this but, there is a large amount of glazing across all elevations facing out onto the buildings. The existing building has the potential for very little overlooking or loss of privacy to neighbouring properties because of the nature of its use as a car park. A larger commercial office building with multiple floors and employees next to the windows and even on balconies has the potential to significantly increase the loss of privacy for surrounding residents and increase overlooking. Therefore in depth tests in relation to privacy and overlooking will need to be put forward demonstrating that the proposal mitigates these issues, for each elevation. The design should also look to incorporated measures that offset these issues.

In relation to daylight/sunlight, following meeting 4, some initial tests showed that there would be an impact to surrounding windows. A full DAS needs to be completed before submission to fully demonstrate that the overall impact is not significant and the nature of the affected windows.

CONCLUSION

The proposed design principles are accepted and moving in the right direction, however the mix of uses and activation on ground floor still need significant work in order to find the right balance. The process has started off correctly with embodied carbon figures being provided as the development progresses; this should be continued. Finally, there is still concern over impact on amenity including daylight/sunlight, privacy and loss of outlook for the surrounding buildings.

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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