

Application ref: 2023/2546/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).

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

As stated in the report under pre-app 2023/0513/PRE and 2023/2456/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. In relation to the Council's mixed use policy, policy H2, the Council could only seek residential accommodation if the uplift of the floor space on site exceeded 200sqm. In this case the new building has a GIA than the car park and therefore a purely commercial building was accepted.

Affordable workspace has been proposed on the lower ground floor. Overall, it appears 6% of the GIA would be affordable which would be a positive start. The Council's policy for commercial schemes is for them to provide 20% of the GIA as affordable and so increasing this should be looked into.

2. Demolition

The principle of demolition is assessed has been accepted through various pre-apps by the Council and there have been multiple discussions around how the building performs its best in sustainability terms.

The developer and architects have presented various upfront and lifecycle embodied carbon figures. Overall these are seemingly still being tweaked as the design formalises and the Council would strongly urge these figures to be an intrinsic part of the design development to ensure the development performs highly in terms of sustainability. The use of the LETI guidance is also recommended.

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 building's 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 throughout the process and Council officers are comfortable that this represents a valid and high quality approach to the site and Conservation area.

In terms of scale and massing, the Council have now seen a full schedule of plans which shows that the building sits comfortably in its immediate and wider surroundings. 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 at approximately 8 storeys. The stepping helps with provide relief in the massing but also matching the building to the prevalent buildings' heights and scale in its immediate surroundings.

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.

The proposed landscaping and ground floor activation has developed considerably since previous meetings and, following meetings with the Council's transport officers, this seems to be quite successful. Widening the pavement, providing more cycle parking, increased urban greening and providing seating means the overall landscaping/ground floor activation is an improvement on what is existing.

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 measures 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. Following from previous iterations the design of the cycle parking and route seems wider, attending to the previous concerns, and the amount of cycle parking is acceptable.

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.

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 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, overlooking, 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.

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. There are concerns that this would affect residents, especially on Saffron Street. 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. Views from the proposed building at multiple floors would also be helpful in demonstrating the impact.

Whilst not an amenity concern, a full consultation process should be undertaken and outlined in a statement of community of involvement. Amendments of the building that have come out from this process is really important and should be included as well.

CONCLUSION

The proposed design, sustainability, transport principles are accepted and moving in the right direction. 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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