

20 November 2024
L241120 SAV Cover Letter



Head of Planning
Planning Department – Development Control
Camden Council
Camden Town Hall
London
WC1H 8ND

Savills (UK) Limited
DL: +44 (0) 20 7409 8948
F: +44 (0) 20 7495 3773

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

SUBMITTED VIA PLANNING PORTAL REF: PP- 13421641

Dear Sir or Madam

SECTION 62 OF TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

APPLICATION FOR EXTERNAL ALTERATIONS TO FRONT & REAR ELEVATIONS INCLUDING NEW CANOPIES; CHANGE OF USE OF PART OF ANCILLARY COMMERCIAL SPACE TO PROVIDE ANCILLARY FACILITIES TO STUDENT ACCOMODATION; AND ASSOCIATED DEVELOPMENT

**ARUNDEL HOUSE, 36-43 KIRBY STREET, LONDON EC1N 8TE
36 KIRBY STREET LTD C/O TRINOVA REAL ESTATE LIMITED**

Introduction

We write on behalf of our client, 36 Kirby Street Ltd c/o Trinova Real Estate Limited, to apply for planning permission for external alterations to front and rear elevations including new canopies, the change of use of part of the ancillary commercial space to provide ancillary facilities to student accommodation, and associated development at 36-43 Kirby Street.

The proposed development comprises of a series of improvements to the building in order to enhance its appearance and improve student facilities through the use of underutilised ancillary commercial areas. The application does not result in either a loss or increase of commercial workshop units, or student rooms. The proposed development forms part of a wider series of improvements and refurbishment to the building.

In accordance with the Town and Country Planning (Development Management Procedure) Order 2015 (as amended), we confirm the following documents comprise the application:

- This covering letter;
- The completed application forms and certificates;
- Community Infrastructure Levy Form;
- Application drawings prepared by Wilmore Iles Architects, comprising, comprising of drawing refs:
 - 1176-WIA-XX-XX-ST-A-10001 Rev P01: – ‘Site Location Plan’;
 - 1176-WIA-XX-XX-ST-A-10002 Rev P02: – ‘Existing Block Plan’;
 - 1176-WIA-XX-LG-GA-A-01200 Rev P01: – ‘Existing Plans Lower Ground Floor’;
 - 1176-WIA-XX-GR-GA-A-01201 Rev -: – ‘Existing Plans Ground Floor’;
 - 1176-WIA-XX-RF-GA-A-01208 Rev P01: – ‘Existing Plans Roof Floor’;
 - 1176-WIA-XX-XX-EV-A-01300 Rev P02: – ‘Existing Elevations West Elevation’;
 - 1176-WIA-XX-XX-EV-A-01301 Rev P02: – ‘Existing Elevations East Elevation’;
 - 1176-WIA-XX-XX-EV-A-01302 Rev P02: – ‘Existing Elevations North Elevation’;
 - 1176-WIA-XX-XX-EV-A-01303 Rev P02: – ‘Existing Elevations South Elevation’;

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



- 1176-WIA-XX-XX-SC-A-01400 Rev -: – ‘Existing Sections, Section A-A & B-B’;
- 1176-WIA-XX-XX-ST-A-10003 Rev P02: – ‘Proposed Block Plan’;
- 1176-WIA-XX-LG-DR-A-20200 Rev P05: – ‘General Arrangement Lower Ground Floor’ (Proposed);
- 1176-WIA-XX-GR-DR-A-20201 Rev P05: – ‘General Arrangement Ground Floor’ (Proposed);
- 1176-WIA-XX-RF-DR-A-20208 Rev P03: – ‘General Arrangement Roof Floor’ (Proposed);
- 1176-WIA-XX-XX-EV-A-20300 Rev P02: – ‘Proposed Coloured Elevations West Elevation’;
- 1176-WIA-XX-XX-EV-A-20301 Rev P04: – ‘Proposed Coloured Elevations East Elevation’;
- 1176-WIA-XX-XX-EV-A-20302 Rev P04: – ‘Proposed Coloured Elevations North Elevation’;
- 1176-WIA-XX-XX-EV-A-20303 Rev P02: – ‘Proposed Coloured Elevations South Elevation’;
- 1176-WIA-XX-XX-SC-A-20400 Rev P03: – ‘Proposed Sections, Section A-A & B-B’;
- Design and Access Statement, prepared by Willmore Iles; and
- Fire Statement, prepared by Rider Levett Bucknall (RLB).

The application has been submitted electronically via the Planning Portal website and the requisite application fee of £578.00 has been paid via the Portal.

The Application Site

The Application Site comprises part of Arundel House, 36-43 Kirby Street, which is a mixed use building comprising student accommodation and commercial units (**‘the Site’**). The area subject to this application comprises the front elevation at ground floor level, part of the rear external area, and part of the internal lower ground floor. The Site measures approximately 189 sq m and is shown in red outline on the Site Location Plan submitted with this application.

The full extent of the Site is illustrated on the submitted Site Location Plan prepared by Suttonca.

Relevant Planning History

Planning Permission (LPA Ref: 2006/1445/P) was granted on 13th December 2006 for alterations and extensions to the building in order to provide workshops and student accommodation (**‘the 2006 Permission’**). The permission was subject to a S106 Agreement also dated 13th December 2006, which, amongst other things, identified the area to be used for the purpose of the Class B1(c) (now within Class E(g)(iii)) workshops, albeit this area extends to ancillary and circulation space outside of the workshop units themselves. This Agreement has been subject to a number of Deeds of Variation.

Most recently, a Lawful Development Certificate (Ref: 2024/2137/P) was granted on 18th June 2024 (**‘the 2024 LDC’**) and confirms that the proposed replacement of render, cladding and brickwork on the building elevations, is lawful.

The Proposed Development

On the front (east) elevation, a new entrance is to be installed along with a new canopy / brise soleil. Along with internal works not subject to this application, this will improve the arrival experience to the building for students. In addition, existing render and louvred screens will be painted black, and existing rockpanel wood is replaced with dark grey mesh, to match that existing on the upper elevations.

At the rear (west) a new canopy is to be installed to the outdoor / courtyard space, with an existing window replaced with a new door to provide access, whilst an existing door is to be infilled with a fixed glazed screen.

The application also includes the change of use of part of the lower ground floor, from ancillary commercial space to provide ancillary facilities for use by students in the building, in an area extending to 75 sq.m in total. This area includes existing corridor and circulation space, including part of the stairwell, along with toilets and storage space. This area, as defined on the Existing and Proposed Lower Ground Floor Plans, is identified within the S106 Agreement as referred to above, for B1(c) space. It is proposed to replace these elements with

facilities for students, including gym space, accessible toilet, and improved laundry facilities, as well as a staff kitchenette. The existing corridor / stairwell elements are retained but included within the change of use element of the application given their identification for B1(c) use, as set out above.

Assessment of the Proposed Development

The statutory development plan for the Site consists of the Camden Local Plan (adopted 2017), the Camden Site Allocations Plan (adopted 2013) and the London Plan adopted in March 2021 (the '**London Plan**').

The Site is not specifically identified in the Site Allocations Plan, but is located within the Hatton Garden Area. It is also within the Hatton Garden Conservation Area and the Central London Area.

Below, we assess the proposed against the relevant local policies that comprise the development plan and the national planning policies contained within the National Planning Policy Framework ('**NPPF**') where appropriate.

Proposed Change of Use

The application proposes the change of use of part of the existing ancillary areas to the workshop space, in order to provide improved facilities which are ancillary to the existing student accommodation in the building, as detailed above. The area subject to the change of use comprises of 75 sq.m and includes stairwell and circulation space.

It should be recognised at the outset that the area subject to the proposed change of use does not result in the loss of any workshop units, and nor does it provide any additional student bedrooms / studios. The workshops will still utilise access and ancillary space in the southern end of the site as at present. The Design and Access Statement confirms that sufficient toilet provision exists to serve the workshops.

These works will also facilitate internal improvements elsewhere in the building (for which planning permission is not required), which include improving communal social and study space at ground floor level, with existing such facilities recognised as being limited. The proposal will therefore improve the student facilities on offer, ensuring adequate provision is provided on site, in order to ensure an appropriate standard of accommodation.

In particular, the proposed change of use would not impact on the existing workshops in the building, all of which are retained and therefore not impacted by the proposed development. This is entirely in line with the employment policies of the Plan, and the Employment Sites & Business Premises SPD (2021), which resist the loss of jewellery workshop space. As such, given there is neither a loss of workshop units, or increase in student rooms, the proposed change of use does not conflict with Local Plan Policies E1, E2 or H9.

As part of this application, a Deed of Variation will be required to the S106 Agreement dated 13th December 2006 (as subsequently varied by Deed) as, whilst the area subject to the change of use does not comprise of any B1(c) (now Class E(g)(iii)) workshops, it is identified as being subject to retention for such purpose within the S106 Agreement and therefore serves no meaningful purpose. We would wish to discuss this with Officers at the earliest opportunity.

Design & Heritage

Local Plan Policies D1 and D2 relate to design and heritage, respectively.

The proposed external works to the building are minimal, comprising of improvements to the ground floor of the front (east) elevation of the building and erection of a small canopy over the entrance. These works include a new entrance, repainting, and provision of replacement materials as detailed above. To the rear (west) elevation, a new canopy is proposed to provide an enhancement to the outdoor space along with replacing an existing door with glazing, and provision of a new wider door in the location of an existing window to improve accessibility.

The Design and Access Statement accompanying the application provides further details in relation to the works and demonstrates the design approach, including materials, is consistent with buildings on the wider street and entirely appropriate in design terms.

The Site is located within the Hatton Garden Conservation Area, for which the Conservation Area Appraisal & Management Strategy (2017) does not identify the building as either making a positive or negative contribution to its character or appearance. The proposed works will improve the appearance of the building and in turn will preserve and also enhance, and do not harm, the character and appearance of the Conservation Area.

Whilst minor, the works will refurbish, modernise and enhance the appearance of the existing building. The physical works are entirely appropriate for the character of the building and are not considered to be contentious.

The proposed development therefore accords with the design and heritage policies in the Local Plan and NPPF.

Other Matters

Whilst the scale of floorspace subject to the change of use is below the threshold that would necessitate a sustainability statement under Local Plan Policy CC2, the Design and Access Statement sets out that the wider refurbishment of the premises will include low energy lighting, and promote the use of natural light where possible. Lighting will use occupancy sensing controls and energy efficient LED lights. Water consumption will be reduced through the use of low flow dual flush toilets, with delayed fill systems, along with low flow or two stage taps in the sanitary and kitchen areas.

The Design and Access Statement also sets out measures to reduce waste during the construction process, albeit the extent of any waste will be minimal given the nature of the works.

The proposed development is not considered to result in any effects in relation to transport or amenity, as there is no change to the number of workshop, or student bedroom, units.

Arising from the above, we conclude that the proposal accords with the development plan and the policies within the NPPF.

Summary and Conclusion

The application seeks planning permission for the partial change of use and physical works at 36-43 Kirby Street. The proposal will refurbish, modernise and enhance the appearance of the existing building, improve student facilities and maintain the existing workshop units within the building. As detailed above, a Deed of Variation to the existing S106 Agreement (as subsequently varied) will be required and we wish to discuss this with Officers as soon as possible.

It has been demonstrated that the proposed development does not conflict with relevant development plan policies.

As the Proposed Development accords with the development plan, planning permission should be granted in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. Furthermore, where an application accords with the Development Plan, it is sustainable development and should be granted 'without delay' in accordance with Paragraph 11 of the NPPF (the presumption in favour of sustainable development).

We trust that the information provided is sufficient for the Council to register and consider this application. We will endeavour to contact you within the next few days to establish your timetable for decision making.

In the meantime, should you require any clarification or additional information, please do not hesitate to contact Alistair Ingram or Amelia Robson at these offices.



Yours faithfully

Savills (UK) Limited
Planning