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19 CHARTERHOUSE STREET

# Town Planning Statement

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**On behalf of: Farrview Limited**

April 2025

NLR/OHA/U0023854

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Appendix A – Planning History

# 1. Introduction and Background

- 1.1 This Planning Statement has been prepared by Newmark on behalf of our client, Farrview Limited, hereafter referred to as ‘the Applicant’, to support an application for planning permission in respect of its proposals at 19 Charterhouse Street, London EC1N 6RA (‘The Site’).
- 1.2 This Statement identifies national, strategic and local planning policy and guidance relevant to the application and assess the degree to which the application accords with the statutory development plan. This Statement also identifies other material consideration relevant in determining the applications, in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.3 The application seeks full planning permission for the ‘the Proposed Development’ as follows:

***Remodelling, refurbishment and extension of the existing building to provide Use Class E (commercial, retail/restaurant and jewellery workspace), landscaped amenity terraces, balconies, relocated entrances, commuter facilities, on-site loading bay and plant; and associated works.***

- 1.4 The application is being brought forward after detailed consultation with the London Borough of Camden (‘LBC’) including the planning, design, highways and inclusive economy teams. The team also engaged with the Greater London Authority, local stakeholders including the BID, the public, and other workshops described further in Section 5 and the Statement of Community Involvement, prepared by Kanda.

1.5 This Statement should be read alongside the following documents which have been submitted in support of this application for planning permission:

- Application Form and Certificate B;
- Air Quality Assessment;
- Draft Construction/Demolition Management Plan;
- Security Needs Assessment;
- Community Infrastructure Levy Form;
- Daylight and Sunlight Report;
- Design and Access Statement (including Access Statement at Appendix 8.2);
- Drawings;
- Preliminary Ecology Appraisal;
- Landscape and Ecological Management Plan;
- Regeneration Statement and Employment and Training Strategy;
- Energy and Sustainability Statement;
- Whole Life Carbon Assessment;
- Circular Economy Statement
- Fire Statement;
- Statement of Community Involvement;
- Heritage, Townscape and Visual Statement;
- Noise Assessment;
- Drainage Strategy Report;
- Flood Risk Assessment;
- Structural Feasibility Statement;
- Transport Assessment,
- Travel Plan;
- Delivery and Servicing Plan; and
- Waste Storage and Collection Report.

## 2. Site and Surrounding Area

### **The Site**

- 2.1 This Chapter describes the Site's location and surrounding context. The extent of the Site is shown on the submitted Site Location Plan. The total area of the Site is 0.14 hectares, or 1,422 sqm.
- 2.2 The Site is situated within the London Borough of Camden, in the ward of Holborn and Covent Garden, and is located within the Central Activities Zone (CAZ).
- 2.3 The Site comprises a long, narrow building which stretches north-south. It is located on the north-west corner of the junction between Charterhouse Street and Farringdon Road. Farringdon Road bounds the Site to the east, Saffron Hill to the west and Charterhouse Street to the south. Buildings (17-23 Farringdon Road) adjoin the Site to the north and include both office and residential uses. The site addresses two different levels with the ground floor meeting Farringdon Road and Charterhouse Street and the lower ground floor addressing Saffron Hill.
- 2.4 The building comprises a ground plus five-storey building with lower ground and part-basement floors. It currently has a dual use comprising office (Use Class E) and learning / non-residential use (Use Class F1) as it remains in operation by the London College of Accountancy (LCA). The latter use was secured via a restrictive land use condition and would revert to office use upon the LCA vacating the premises.
- 2.5 The Site is located within the Hatton Garden Conservation Area although the building itself is not listed.

- 2.6 The architecture of the existing building is hard and defensive in appearance, with small, high-cilled windows, dark metal panel cladding, concrete columns, and has a distinctive rounded corner feature which faces south-east.
- 2.7 The Site is very well connected, benefiting from the highest PTAL score of 6b with Farringdon station being the closest railway line, located to the north-east.

### **The Surrounding Area**

- 2.8 The surrounding area is largely characterised by medium and high buildings and provides a mix of uses, although predominantly comprising retail, office and residential land uses. The jewellery quarter of Hatton Garden lies to the north-west of the site and the London Museum to the south is in the process of adapting the General and Poultry Markets of West Smithfield to become their new home.
- 2.9 The Site is located in the corner of the London Borough of Camden and is adjacent to two other boroughs. To the south of the Site beyond Charterhouse Street is the boundary to the City of London, while to the east beyond Farringdon Road is the boundary to the London Borough of Islington.
- 2.10 There are several listed buildings in the surrounding area, including 25&27 Farringdon Road and the 1960s Poultry Market to the east.
- 2.11 The local plan policies map identified that the site has several planning designations including:
- Protected Vista 2A.1 - Parliament Hill summit to St Paul's Cathedral;
  - Protected Vista 3A.1 – Kenwood (viewing gazebo) to St Paul's Cathedral;
  - Protected Vista 6A.1 (Background) – Blackheath Point to St Paul's Cathedral;

- Hatton Garden Area
- London Suburbs Archaeological Priority Area
- Central London Area



### 3. Planning History

3.1 This Section outlines the relevant planning history associated with The Site.

3.2 On 18 January 2010 planning permission ref. 2009/4737/P was granted, subject to a s.106 Agreement, for:

*“Change of use of existing building from offices (Class B1a) to dual use as non-residential institution use (Class D1) and offices (Class B1a).”*

3.3 The application was supported by evidence of vacancy and marketing for a 2-year period between 2007 and 2009. This was acknowledged in accepting the temporary loss of Class B1 office floorspace, in addition to the fact that a portion of Class B1 space would remain on each floor.

3.4 The new Class D1 element was to be used by the London College of Accountancy (LCA) (Anglia Ruskin University) and the planning permission is specific to this operator. Policy generally seeks to protect D1 uses once established under Local Plan Policy C2, however the Officer Report stated that:

*“The dual use of the building would ensure the establishment of the D1 elements of the proposal. However, given the building’s location within the Hatton Garden Area it would be necessary for the D1 element to change back to B1 use once the current occupier vacates the building.”*

3.5 The reversion is secured via Condition 3 that states:

*“This permission is personal to the London College of Accountancy and shall endure for the period of their occupation only. On the London College of Accountancy vacating the premises the use shall revert to the lawful use for office (B1 use) purposes.”*

- 3.6 During an initial meeting regarding this site in May 2023, officers confirmed that once the LCA vacated, the lawful use would revert to offices (Class E), therefore officers would assess a future application on that basis, even if the application came forward with the London College of Accountancy still in situ.
- 3.7 The full planning history can be found in Appendix A.

## 4. Development Proposal

4.1 This Section of the Statement sets out the key aspects of the Development Proposals. A full description of the proposals is provided in the supporting Design and Access Statement, prepared by DSDHA.

4.2 This application seeks full planning permission for the following development:

***“Remodelling, refurbishment and extension of the existing building to provide Use Class E (commercial, retail/restaurant and jewellery workspace), landscaped amenity terraces, balconies, relocated entrances, commuter facilities, on-site loading bay and plant; and associated works.”***

4.3 The intention of the scheme is to retrofit and extend the existing building to provide a gateway building for Hatton Garden and Camden.

4.4 The proposed development involves the partial demolition of the existing building on site, and the remodelling of the existing façade and upward extension to provide additional office space and amenity space, whilst additional provision for flexible retail space and jewellery workspace across ground and lower ground floors. Approximately 50% of the building is being retained.

4.5 The existing building currently occupies ground floor plus 5 storeys (with lower ground and part-basement floors) with large roof-top plant enclosures. The proposed development increases this to 10 storeys (plus rooftop plant), level 10 comprising a smaller pavilion associated with the highest roof terrace level.

- 4.6 Both Farringdon Road and Charterhouse Street have buildings of varying height, however given the site's prominent corner plot, it currently lacks any engagement or presence and is uninviting and unwelcoming.
- 4.7 The existing height is circa 40.5m AOD while the proposed height is just under 58m AOD.
- 4.8 The overall layout of the proposed building comprises flexible office workspace, with typical floors at levels 01 - 06. The ground floor will comprise retail/restaurant use and jewellery workspace with a central office reception/lobby area accessed from Farringdon Road which will internally connect to the lower ground floor. Here, there will be cycle parking and end of trip facilities as well as back of house and plant. Jewellery workspaces are also located on the lower ground floor, to Saffron Hill. Both the ground and lower ground floor affordable jewellery workspaces would have dedicated entrances and would not be directly accessible from the main building.
- 4.9 From level 07, the building is set back to varying degrees, enabling the introduction of terraces and cloister gardens, allowing for functional amenity spaces and biodiversity through greening. The set back is echoed at ground level onto Charterhouse Street where an elegant, curved space is provided with through-views to Saffron Hill.
- 4.10 A feature lantern is provided at the south-east corner of level 09. The intention of the lantern is to create a prominent and celebrated local landmark at the corner of Charterhouse Street and Farringdon Road. The main roof terrace is located at Level 10, and the roof itself houses the plant units which are required for additional ventilation and the life-safety generator.
- 4.11 The façade is divided into three main levels of bottom, middle and top and is deliberately designed to be clearly articulated in this manner. The bottom will comprise

rougher and darker materials, including stone and metal work, with lighter tones and smoother textures towards the upper levels.

4.12 The base shares a strong and robust design approach for longevity, with two-storey arches on Farringdon Road making way for triple storey arches on Saffron Hill with a continuous ‘tide-line’ around the building.

4.13 The Proposed Development has been designed to increase the amount of high-quality commercial floorspace and to activate the ground and lower ground levels of the building, re-establishing Saffron Hill as a lively and thriving thoroughfare.

4.14 In summary, the total floor areas are set out in the table below:

Land Use	Existing (GIA sqm)	Proposed (GIA sqm)	Net Change (GIA sqm)
Office	10,070	12,016	1,946
Retail	0	310	0
Jewellery Workspace	0	520	0
<b>Total</b>	<b>10,070</b>	<b>12,846</b>	<b>2,776</b>

### **Pedestrian Access**

4.15 There are three pedestrian access points proposed along Farringdon Road: one for the office space which is the main entrance into the lobby area; and one each for the retail space and jewellery workspace. There will also be pedestrian access for building users (cyclists and office employees) into the main building from Saffron Hill and separate entrances to the jewellery workspaces. All entrances provide level access.

### Servicing

- 4.16 It is proposed that all waste generated will be stored in a single waste store on the lower ground floor, along the Saffron Hill side. Waste bins will be provided here, and collection would be controlled by a private contractor. Waste collection vehicles would travel southbound down Saffron Hill and will be able to turn at the southern end before exiting north. Saffron Hill is a private road, under the ownership of 17 Charterhouse, with public rights of way.

### Car Parking

- 4.17 The Proposed Development is 'car-free' and therefore no car parking is proposed on Site.

### Cycle Parking

- 4.18 A total of 218 long stay cycle parking spaces are proposed and these will be located on the lower ground floor, accessed via Saffron Hill. The breakdown of long-stay spaces is as follows:

Stand Type	Long-stay Spaces	Percentage
Two-tier	174	80%
Sheffield stand	10	5%
Foldable bike lockers	22	10%
Accessible spaces	12	5%
<b>Total</b>	<b>218</b>	<b>100%</b>

4.19 With regards to Sustainability the proposed development intends to:

- Maximise the retention of existing structures;
- Maximise the reuse and recycling of existing materials;
- Target:
  - Upfront embodied carbon target <600 kgCO<sub>2</sub>e/m<sup>2</sup> GIA (LETI B);
  - Life cycle embodied carbon target <970 kgCO<sub>2</sub>e/m<sup>2</sup> GIA (LETI C);
  - Energy and operational targets of 100% electric HVAC (heating, ventilation and air conditioning);
  - EPC (energy performance certification) rating of B with aspiration of A; and
  - Improve Urban Greening Factor and Biodiversity Net Gain.

## 5. Pre-application Engagement and Consultations

- 5.1 This section summarises the outcome of the pre-application process and consultation process, and how the proposal has responded to the comments and feedback received. This section should be read alongside the Statement of Community Involvement (SCI), prepared by Kanda, submitted with the application.
- 5.2 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process
- 5.3 Paragraph 40 of the National Planning Policy Framework (2024) ('NPPF') emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources and provides improved outcomes for the community.
- 5.4 In addition, paragraph 42 of the NPPF states that: "The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, proactive approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs."
- 5.5 Paragraph 137 of the NPPF states: "Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their



proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

- 5.6 Part A of London Plan Objective GG1 encourages early and inclusive engagement with stakeholders and local communities on the development of proposals.

### **Pre-application Meetings**

- 5.7 Extensive pre-application meetings and workshops have been held with officers from the LBC between June 2024 and January 2025. A list of these meetings is set out below:

- 06 June 2024 - Introductory meeting focussing on Height, Bulk and Massing (Pre-app 1)
- 01 August 2024 - Design meeting (Pre-app 2)
- 11 Sept 2024 - Highways Meeting
- 17 Sept 2024 - Design meeting (Pre-app 3)
- 19 Sept 2024 - Planning meeting to include Sustainability (Pre-app 4)
- 11 October 2024 - Design Review Panel
- 17 December 2024 – Inclusive Economy Team Meeting
- 08 January 2025 - Planning and Design (Pre-app 5)
- 04 February 2025 - GLA/TfL meeting
- 27 May and 03 April 2025 – Final Planning and Design meetings (Pre-app 6)

- 5.8 In summary, the pre-application discussions focussed on the overall design, particularly the ground and lower ground floor access and layout, height, façade details and articulation, bulk and massing, the affordable jewellery workspaces, sustainability and highways.

### **Design Review Panel (DRP) and Greater London Authority (GLA)**

- 5.9 The DRP report from October 2024 summarised that they support the overall approach to the project. The proposed taller building was acceptable in principle, although the wall along Saffron Hill was too sheer as designed. They considered the height along Saffron Hill should be reduced and encouraged more emphasis on vertical elements and reduction of the horizontality of the facades. The suggested reconsidering the rooftop lantern, balconies and existing, retained column on the Saffron Hill stairs.
- 5.10 The GLA were pleased with the overall proposal stating that the principle of the development on site to provide additional office floorspace and new retail and affordable jewellery space within the CAZ was strongly supported in strategic planning terms. They added that the scale and massing was appropriate. They also provided a helpful critique on the LVMF and other matters such as transport and environmental issues which the wider team has taken on board.

### **Public Consultation and stakeholder engagement**

- 5.11 The Applicant also sought to engage with the public, local stakeholders and businesses prior to a formal planning application to raise awareness of the proposals amongst residents and neighbours for the purposes of receiving feedback.
- 5.12 Kanda, on behalf of the Applicant, also emailed the Holborn and Covent Garden ward councillors on 16 January 2025 to inform them of the launch of the public consultation and invite them to a briefing with the project team, Kanda followed up with them again on 29 January inviting them to attend the in-person public exhibition. As part of this approach Kanda, on behalf of the Applicant, also reached out to Councillor Adam

Harrison as the Cabinet Member for Planning and a Sustainable Camden, inviting him to meet the team or attend the public drop-in session on 6 February.

- 5.13 As part of the wider consultation a two-page flyer was distributed to 1,567 addresses on 24 January 2025 and included details of the dedicated consultation website for recipients to view and provide feedback.
- 5.14 Although well-publicised, only 1 person attended the drop-in session and 3 people provided feedback online. Separately, a number of meetings were held with neighbouring landowners and businesses.
- 5.15 As part of the consultation process, the applicant met with the Hatton Garden BID and held early discussions with Centa, providers of workspace, who have experience in providing affordable jewellery workspace in Camden.

## 6. Planning Policy Framework

- 6.1 This Section outlines the relevant national, regional and local planning policy and guidance documents against which the proposed development should be assessed and the key planning considerations.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 6.3 Accordingly, for the purposes of the Proposed Development the statutory Development Plan comprises:
- The London Plan (2021); and
  - Camden Local Plan (2017) coupled with the Site Allocations Plan (2013).
- 6.4 Although not forming part of the statutory Development Plan, the following documents are considered important material considerations:
- National Planning Policy Framework ('NPPF') (2024);
  - National Planning Practice Guidance ('NPPG');
  - Camden's Planning Guidance (CPGs);
  - London Plan Supplementary Planning Guidance Documents

### **National Planning Policy Framework (NPPF) (2024)**

- 6.5 The NPPF, last revised in December 2024, sets out the Government's economic, environment and social planning policies for England. It summarises in a single document all previous national planning policy advice. Taken together, these policies

articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

6.6 The NPPF establishes the presumption in favour of sustainable development at Paragraph 11. Paragraph 8 establishes the three overarching objectives of the planning system to achieve sustainable development:

1. An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and identifying and coordinating the provision of infrastructure.
2. A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
3. An environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

6.7 Chapter 6 seeks to build a strong, competitive economy. Paragraph 85 states that “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”

### **Planning Practice Guidance (PPG) (March 2014 and updated regularly since)**

- 6.8 In March 2014, the Department for Communities and Local Government (‘DCLG’) launched its web-based Planning Practice Guidance (‘PPG’) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner. The PPG was updated in February 2024 in line with the new biodiversity net gain legislation.
- 6.9 The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determining of planning applications.

### **The London Plan (2021)**

- 6.10 The London Plan was adopted in March 2021. It is the overall strategic plan for London, setting out integrated economic, environmental, transport and social framework for the development of London over the next 20 to 25 years. The London Plan forms the London wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.
- 6.11 The detailed objectives of the London Plan seek to ensure that London can meet the challenges of economic and population growth; be internationally competitive and successful, deliver diverse, strong, secure and accessible neighbourhoods; be world-leading in improving the environment; and be easy, safe and convenient for everyone to access, jobs, opportunities and facilities.
- 6.12 The London Plan is supported by guidance, which provides further information about how the London Plan should be implemented.

### **The Camden Local Plan (2017)**

- 6.13 The Camden Local Plan adopted in July 2017 sets out how development will be managed within the borough. The Plan seeks to address a number of challenges; adapting to Camden’s growing population and to social change, the supply and cost of housing in the borough, maintaining a successful economy and improving opportunities, inequalities, health and wellbeing, improving transport, quality of the environment and crime and safety.
- 6.14 To address these challenges, the Plan sets three key objectives:-
1. Developing new solutions with partners to reduce inequality and improve health and wellbeing
  2. Creating conditions for and harnessing the benefits of economic growth
  3. Investing in our communities to ensure sustainable neighbourhood
- 6.15 The Council’s objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. The Plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.
- 6.16 Camden Planning Guidance (“CPG”) provides further detailed guidance in assessing development in the Borough.

### **Draft Camden Local Plan**

- 6.17 London Borough of Camden is currently working towards their new Local Plan which will set out a vision for development in Camden for the next 15 years. A Regulation 18 draft was published for consultation in early 2024. While this will soon be superseded by a Regulation 19 consultation version expected in May 2025, this is not yet published. Following the next consultation, the publication draft will be submitted to the Secretary of State in accordance with Regulation 22 for consideration at an Examination in Public (“EiP”) by an independent inspector, expected in winter 2025. The inspector will provide a report following the hearings and, subject to the inspector’s recommendations and any necessary changes, the revised plan will be adopted by Full Council, which is anticipated for 2026.
- 6.18 An emerging local plan is not included within the definition of “development plan” within s.38 of the Planning and Compulsory Purchase Act 2004. However, an emerging local plan is a material consideration. Paragraph 49 of the NPPF provides that a local authority may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); the extent of unresolved objections; and the degree of consistency of the relevant policies in the emerging plan to the NPPF.
- 6.19 Our view is the whilst the Regulation 18 draft policies are a material consideration, having regard to paragraph 49 of the NPPF and given the early, pre-submission stage, these policies currently hold no weight and therefore they have not been assessed within this Planning Statement.



### **Listed Buildings and Conservation Areas Act 1990**

- 6.20 In addition, decisions must accord with relevant legislation. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 requires the determining authority to pay special attention to the desirability of preserving or enhancing the character and appearance of a conservation area when determining applications.

### **Key Planning Considerations**

- 6.21 The key planning considerations associated with the Proposed Development are assessed in following sections and include:
- Section 7: Principle of Land Use
  - Section 8: Design
  - Section 9: Heritage
  - Section 10: Townscape and Views
  - Section 11: Landscaping and Ecology
  - Section 12: Energy and Sustainability
  - Section 13: Transport and Servicing
  - Section 14: Daylight, sunlight and overshadowing
  - Section 15: Amenity
  - Section 16: Other Considerations
  - Section 17: Planning Obligations and Community Infrastructure Levy
- 6.22 The following sections of the Planning Statement address each of the key planning considerations above having regard to the development plan as a whole and any other relevant material considerations.

## 7. Principle of Land Use

- 7.1 This section assesses the Proposed Development in terms of the proposed land uses.

### **Principle of Development – Policy Context**

- 7.2 Paragraph 11 of the NPPF sets out that there is a presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.
- 7.3 Paragraph 125 of the NPPF confirms that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused.
- 7.4 Paragraph 85 of the NPPF states that significant weight should be given to supporting economic growth and productivity, taking into account local business needs and opportunities for development.
- 7.5 Paragraph 90 of the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
- 7.6 London Plan policy SD4 ‘The Central Activities Zone (CAZ)’ states that “The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.”

- 7.7 London Plan policy E1 ‘Offices’ states that improvements to the quality, flexibility and adaptability of office space of different sizes should be supported, including refurbishment. Part G states that development proposals relating to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace.
- 7.8 Local Plan Policy G1 states that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden, which includes supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 7.9 Local Plan Policy E1 (part g) states that the Council will secure a successful and inclusive economy in Camden by (*inter alia*):
- safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;
  - supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites; and
  - promoting and protecting the jewellery industry in Hatton Garden.
- 7.10 Policy E2 also directs office development to Central London (part f) and supports and promotes the development of Camden’s Knowledge Quarter (part e). Policy E2 (part i) concludes by recognising the importance of other employment generating uses, including retail.
- 7.11 Local Plan Policy E2 states that the Council will encourage the provision of employment premises and sites in the borough and will protect premises and sites that

are suitable for continued business use. The council will also consider higher intensity redevelopment provided that:

- The level of employment floorspace is maintained or increased.
- The proposed premises include floorspace suitable start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable.
- the scheme would increase employment opportunities for local residents, including training and apprenticeships.

### **Commercial Use: Assessment**

- 7.12 Although the current lawful use operates as Class D1, the planning permission is for a dual use and the education use is specific to the current operator, secured via planning condition. The officer's report for the permission granted in 2010 clarified that, given the building's location within the Hatton Garden Area, it would be necessary for the Class D1 element to change back to Class B1 use once the current occupier vacated the building. The land use would therefore revert to Class E once the operator vacates the premises.
- 7.13 Therefore, the principle of use for commercial office floorspace has already been established, reverting back to Class E when the current occupiers vacate.
- 7.14 Nevertheless, the site is located with the Central Activities Zone were the intensification of the significant office functions of the CAZ is strongly supported.
- 7.15 The proposal will deliver over 12,000 sqm (GIA) of high-quality office floorspace (Class E), approximately 4,000 sqm of uplift. This space will be catered towards

contemporary office working environments and will improve on the existing office stock while providing additional floorspace.

- 7.16 The Proposed Development seeks to optimise and make efficient use of Previously Development Land and will also deliver intensification of the Site through the complete refurbishment of the building. This will drastically improve the quality, flexibility and adaptability of commercial floorspace within the building.
- 7.17 Accordingly, the principle of the comprehensive remodelling, refurbishment and intensification of commercial floorspace is supported by planning policy at all levels.

#### **Retail Use: Policy**

- 7.18 London Plan Policy E9 Retail, markets and hot food takeaways states that development proposals should: 1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres 2) support convenience retail in all town centres.
- 7.19 Policy TC1 Quantity and location of retail development states that the council will focus new shopping and related uses in Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations.

#### **Retail: Assessment**

- 7.20 The existing site is very defensive and does not currently provide any retail space. Therefore, the proposed development would see the delivery of 310 sqm of new retail floorspace towards the southern corner of the ground floor, occupying a corner unit, self-contained and open to the public.

- 7.21 The flexibility of this use allows for the retail space to provide a range of possible uses. The intention is to use this space for either retail and / or restaurant uses.
- 7.22 This space would target the occupiers of the buildings, as well as those passing by and it is likely the space would be occupied by a food and beverage operator, such as a café or restaurant. This also provides an opportunity for the scheme to promote economic development and increase spending in the area.
- 7.23 The proposed retail unit will provide a beneficial local amenity, where people can sit and relax in the open space provided and would operate in a way which would not have an adverse impact in terms of local amenity or local environmental quality.
- 7.24 Rather, the proposed commercial units will provide a vibrant and active streetscape. As such, the proposal for retail floorspace accords with planning policy at all levels.

#### **Affordable Jewellery Workspace: Policy**

- 7.25 Local Plan policy E1, supporting text 5.32, states that the Hatton Garden area has been established for jewellery industry since the 19<sup>th</sup> Century and is home to nearly 500 businesses. It states the Council will seek to secure and retain premises suitable for jewellery workshop uses and related uses through planning obligations.
- 7.26 Policy E2 states that where proposals in Hatton Garden would increase total gross internal floorspace by more than 200sqm, LBC will seek 50% of the additional floorspace as affordable premises suitable for the jewellery sector.

### **Affordable Jewellery Workspace: Assessment**

- 7.27 The Site is located within the Hatton Garden Area and the Proposed Development seeks to include 520 sqm of jewellery workspace across the ground, and lower ground floors. Therefore, the provision of jewellery workspace here is both appropriate and strongly encouraged.
- 7.28 Furthermore, all the jewellery workspaces will be affordable and the rent will be discounted at a peppercorn rate. This will be secured as part of a S106 Legal Agreement.
- 7.29 The floorspace will be suitable for small and medium sized enterprises as well as start ups which is supported in the Employment Sites and Business Premises CPG which states that LBC will seek to secure an element of affordable SME workspace from large scale employment developments via planning obligations.
- 7.30 Whilst the quantum of jewellery floorspace is below the 20% suggested in guidance the team has consulted with LBC's Inclusive Economy team, during the pre-application stage, who supported the provision of jewellery workspace, and particularly truly affordable jewellery workspace.
- 7.31 As such, the proposed jewellery workspace accords with planning policies at all levels.

## 8. Design

- 8.1 This section assesses the proposals against relevant national, regional and local planning policy in terms of design. It should be read in conjunction with the Design and Access Statement prepared by DSDHA.

### **Design: Policy Context**

- 8.2 Section 12 of the NPPF stresses the fundamental importance of high-quality, beautiful design in the pursuit of delivering sustainable development. The NPPF sets out a clear rationale for high quality design, reinforcing that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities” (Paragraph 131).
- 8.3 Paragraph 135 of the NPPF states that planning policies and decisions should ensure that developments:
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
  - are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
  - are sympathetic to local character and history;
  - establish or maintain a strong sense of place;
  - optimise the potential of the site; and
  - create safe places.
- 8.4 At paragraph 137, the NPPF states that design quality should be considered throughout the evolution and assessment of a scheme. It encourages early discussion



between the Applicant, LPA and local community; ensuring commercial and local interests are aligned.

- 8.5 Furthermore, Paragraph 139 states that “local planning authorities should give great weight to outstanding or innovative designs which help to raise the standard of design in the area and are sensitive to local character and the surrounding environment.”
- 8.6 London Plan Policy D1 provides a framework for delivering Good Growth through good design. Part A of this policy sets out the requirements for assessing an area’s characteristics and Part B sets out the steps for using this information to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site’s context and supporting infrastructure.
- 8.7 London Plan Policy D2 states that the density of development proposals should consider and be linked to, the provision of future planned levels or infrastructure and be proportionate to the site’s connectivity and accessibility by walking, cycling and public transport to jobs and services (including both PTAL and access to local services).
- 8.8 London Plan Policy D4 sets out how the design of development proposals should be thoroughly scrutinised by borough planning, urban design and conservation officers and sets out a series of processes and actions to ensure development delivers good design. It sets out that the higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management.
- 8.9 London Plan Policy D5 (Inclusive Design) requires development proposals to achieve the highest standards of accessible and inclusive design. Design and access statements for development proposals should include an inclusive design statement.

- 8.10 Local Plan Policy C6 states that the Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. This includes the expectation that all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;
- 8.11 Local Plan Policy D1 of the Local Plan seeks to secure high quality design in development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrating well to the surrounding streets and townscape, comprises high quality architecture, is accessible for all and designed to minimise crime and anti-social behaviour.
- 8.12 Further detailed design guidance is set out within the Design CPG published in March 2019.

### **Design - Assessment**

- 8.13 The key principle for the Site is to retrofit and extend the existing building to provide a gateway building for Hatton Garden and Camden.
- 8.14 The proposed development has been designed by DSDHA who have been involved from the early inception of the scheme, through all the pre-application and other stakeholder discussions. In particular, the approach taken to the height and upper-level massing has been arrived at through a series of design workshops with the council, as well as through a Design Review Panel and a meeting with the Greater London Authority. The objective was not only to bring forward a high-quality scheme, but to relish the opportunity to create a statement building.

- 8.15 A Design and Access Statement has been prepared by DSDHA which addresses all aspects of the proposal's design evolution, including the Site and Context, Analysis, Design Development, Façade and Massing Design and Landscaping.
- 8.16 The key objectives that have guided and shaped the design approach include:
- Maximise retention;
  - Carbon reduction in structure;
  - Carbon reduction in façade;
  - Terraces and greening;
  - Healthier workplaces; and
  - Activation of Ground and Lower Ground Floors.
- 8.17 The architectural quality and materials are of high-quality and have been specifically chosen to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.
- 8.18 DSDHA have worked closely with the heritage and townscape consultants to identify and analyse the local and protected views and heritage assets around the Site. The proposals have been developed to mitigate the impact on these assets whilst providing a balanced approach to the redevelopment of the Site.

### **Layout and Access**

- 8.19 The approach to the layout of the Site focusses on activating the ground and lower ground floors, to increase accessibility from Farringdon Road and Saffron Hill; and optimise the office floorspace. This is achieved by rationalising the building cores from the existing three cores into one efficient core that services all levels.

- 8.20 The layout would also maximise accessibility along the frontages, with new office entrances in the centre of the ground floor from Farringdon Road into a lobby area and from Saffron Hill for cycle access. Separate entrances to the retail unit and jewellery workspaces are provided from Farringdon Road and Saffron Hill.
- 8.21 Being aware of the site constraints, the Proposed Development has been deliberate in its approach to locating the retail space, jewellery space, end of trip facilities and the commercial floorspace. The retail unit at the corner of Farringdon Road and Charterhouse Street has been positioned to maximise the activity and public amenity which the building can realistically offer. A variety of appropriately sized jewellery workspace units with dedicated access are located on ground and lower ground floors. The end-of-trip facilities are accessed from Saffron Hill but internally positioned along the eastern side of the lower ground floor.
- 8.22 The current structure of the lowest level of the existing bridge that oversails and spans across the steps down to Saffron Hill is to be removed and the existing column would then be extended to support the upper bridge levels. This opens up the connection to Saffron Hill and improves the level of light and sense of enclosure at the steps. The retained upper bridge levels will be converted to provide open, landscaped terraces.

### **Height, Scale and Massing**

- 8.23 This comprises a mix of commercial, retail floorspace and jewellery workspace. The Proposed Development will reach a maximum height 57.725 AOD, across 10-storeys plus roof terrace. The proposed height is assessed in greater detail in the following section, however it is considered that the overall form and scale fits comfortably into the urban context and has been carefully considered, being influenced by surrounding buildings, being sympathetic to its setting whilst also being bold and creating a strong and refined corner presence.

- 8.24 The proposed massing and articulation of the Proposed Development has evolved through an extensive process through discussions with LBC, DRP, GLA and local stakeholders.
- 8.25 Within the immediate urban context, Farringdon Road and Charterhouse Street have broadly consistent massing, with the exception of the range of Smithfield Markets. Taller buildings are located all along the eastern side of Farringdon Road, and directly south of the site.
- 8.26 The Proposed Development seeks to respond to the overall scale and massing of the surrounding buildings. These discussions have been a matter of balance between being sensitive to the surrounding Conservation Area, whilst also celebrating the opportunity which the strong corner presence of the building presents. As such, an iconic 'lantern' is proposed atop the building which will act as a local nodal point and urban landscape feature.
- 8.27 The base features a double height order along Farringdon Road, making way to a triple height order along Saffron Hill to address the level change. The massing for the middle remains largely unchanged.
- 8.28 The proposed massing for the upward extension comprises various elements and has been tiered and set back from the existing frontage. Breaks and inset elements in the facade present further opportunities for amenity spaces and greening. This also helps to reduce the sense of enclosure along Saffron Hill.
- 8.29 The retail/restaurant unit, at the corner of Farringdon Road and Charterhouse Street, will have a curved 'squinched' corner with a vaulted ceiling which adds visual interest to an important junction and grounds the corner element of the building with its pinnacle in the lantern above. The squinch corner also reflects the generous curved

cutback from Charterhouse Street that provides covered external colonnaded space to the proposed retail space with the potential for seating and greenery. An arched passage connects the curved corner to the colonnade, increasing the permeability of the ground floor to the south of the building whilst the first-floor curves above. A 'tide line' is implemented that runs at a consistent datum above the double height ground floor, signified by the change in material from rough to polished.

- 8.30 The façade design has been developed to read vertically as well as horizontally, creating a visual rhythm which describes the curve of Saffron Hill.
- 8.31 Overall, the massing and articulation of the Proposed Development benefits the urban experience and provides opportunities to improve the spaces internally and externally.

### **Appearance and Materials**

- 8.32 The Proposed Development appearance and materials have taken account of the local context, whilst also considering an approach suitable for the proposed density and typology.
- 8.33 The architectural expression of the building is articulated through a timeless base, middle and top approach with robust and durable materials appropriate for the use of buildings and the urban context.
- 8.34 A rusticated stone or concrete is proposed for the base, along with a polished column at the Farringdon Road entrance. This will create a strong definition in colour (being darker at the base) and texture (being rougher at the base) from the base to the middle and reinforce the double height volume.

- 8.35 At the bottom of the steps to Saffron Hill, the introduction of metalwork will compliment the masonry frame and break down the scale of the fenestration. The materiality here will be more of a polished textured stone or concrete, differentiated slightly (from the rough stone at the base) to represent the lower ground floor level. The metalwork currently proposed would be a similar colour to copper/bronze in keeping with the ‘saffron’ theme in its orangey red appearance.
- 8.36 The materiality of the middle transitions to a Roach Bed Portland Stone and profiled precast concrete on the corner which emphasises the verticality and drawing viewers eye to the lantern on level 09.
- 8.37 The top of the building will comprise mostly of profiled precast stone combined with refined metal detailing, acknowledging the jewellery making craft of the area. The vertical elements will be inflected, creating an energetic silhouette when viewed from street level.
- 8.38 The design has been developed with quality long life materials and careful consideration of energy performance (explored in Section 11).
- 8.39 Accordingly, it is considered that the Proposed Development would comply with the design principles and policies set out above. For further details, please refer to the Access Statement included in the DAS.

## 9. Heritage

- 9.1 This section considers the development proposals against relevant national, regional, and local heritage planning policy and guidance relating to designated heritage assets.

### **Heritage – Policy**

- 9.2 The statutory requirements for planning applications which affect statutorily designated heritage assets, including listed buildings and conservation areas, or their setting, seek to ensure that special regard is given to the desirability of preserving the asset or its setting, character, appearance or any features of architectural or historic interest which it possesses (Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990).
- 9.3 Section 66(1) of the Planning (Listed Buildings and Conservation Area) Act 1990 requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses.
- 9.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that, in respect of development affecting conservation areas, “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area” when determining applications.
- 9.5 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the



significance of the asset, and the harm (substantial or less than substantial) that the proposals would cause to the significance of the heritage asset.

- 9.6 Under paragraph 207 of the NPPF, in determining applications, local planning authorities should require an Applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 9.7 Following on from this, Paragraph 20 sets out that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal taking account of the available evidence and any necessary expertise and that such an assessment should be taken into account when considering the impact of a proposal on a heritage asset.
- 9.8 Paragraph 210 of the NPPF states that in determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 9.9 Paragraph 212 of the NPPF states that, in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

- 9.10 Paragraph 213 of the NPPF states that 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.
- 9.11 Paragraph 215 of the NPPF states that, 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.
- 9.12 Paragraph 20 of the Historic Environment PPG in relation to the historic environment acknowledges that the public benefits which flow from a development can be anything that delivers economic, social or environmental progress. The benefits should flow from the proposals and be of a nature and scale to be of benefit to the public interest at large and should not just be a private benefit. Benefits do not, however, have to be visible or accessible to the public in order to constitute public benefits.
- 9.13 London Plan Policy SD4 seeks to sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components and other features including distinctive buildings and historic heritage, through high quality design and urban management.
- 9.14 London Plan Policy HC1 Part C states that development proposals affecting heritage assets, and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 9.15 At a local level, the importance of the built heritage to the character of the London Borough of Camden is formally acknowledged in the Camden Local Plan at Policy D1 (Design) with LBC requiring that development preserves or enhances the historic

environment and heritage assets in accordance with Policy D2 Heritage, which itself predominantly covers the topic.

- 9.16 Local Policy D2 of the Local Plan states that the Council will preserve and where appropriate, enhance Camden’s rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.
- 9.17 With regard to Conservation Areas, Policy D2 requires that development within them preserves, or where possible, enhances the character and appearance of the area (part e) and the Council will resist development outside of a conservation area that causes harm to the character or appearance of that conservation area (part g).
- 9.18 Policy D2 continues that development that would cause harm to the significance of a listed building through an effect on its setting would be resisted (part k).

### **Heritage – Assessment**

- 9.19 The Heritage, Townscape and Visual Statement (‘HTVS’), prepared by Turley, identifies and confirms the heritage assets within the vicinity of the Site and the significance of which would likely be affected by the Proposed Development. It sets out a focussed study of the historical development of the Site, and the changing relationship in townscape up to the present day.
- 9.20 The Statement then assesses the particular heritage interest of each of the identified heritage assets within the defined study area and provides an assessment of the likely impacts of the Proposed Development on Site. Heritage impacts are assessed in overall terms in light of the relevant legislative and planning policy context.

- 9.21 There are several heritage assets in the local area which have been taken into consideration. The heritage receptors considered include five conservation areas, two Grade I Listed Buildings, 30 Grade II Listed Buildings and four locally listed buildings.
- 9.22 Following consideration of the heritage receptors, the relevant heritage assets have been scoped into the HTVS, being the Hatton Garden, Smithfield and Charterhouse Square Conservation Areas, the Grade II listed buildings at Nos. 25 and 27 Farringdon Road, Nos. 51—53 Charterhouse Street, Smithfield Poultry Market and the viaduct over Farringdon Street.

### **Conservation Areas**

- 9.23 The building is located in the Hatton Garden Conservation Area although the existing building is modern and is not statutorily or locally listed. In this context, Turley identified the key matters for consideration as assessing the direct impact of the Proposed Development on the Hatton Garden Conservation Area (within which the Site is located) and the indirect impacts on the other identified heritage assets through potential change to part of their settings.
- 9.24 With regards to the Hatton Garden Conservation Area, whilst taller than the existing building, Turley considers the building to be carefully considered, with stepped, terraced massing allows the building to soften and recede gently in views. Façade design and materiality take cues from elsewhere in the CA and the lantern feature creates a strong and refined corner presence signalling the entrance to Hatton Garden from the south. An important benefit is the introduction of jewellery workspace at both ground floor levels which reflects the important associations of the area, both historically and now. The workspaces on Saffron Hill will also enliven this historic route towards the markets of Smithfield, improving activation and creating a more inviting pedestrian route.

- 9.25 In conclusion, Turley considers the Proposed Development will have no adverse impact on the significance of the Hatton Garden CA and cause no harm. They consider the opportunities taken to improve the Site's engagement with its surroundings and the considered and carefully crafted architectural form of the new building will act to enhance character and appearance.
- 9.26 Turley also considers that the proposed development would have no adverse impact on the Smithfield or Charterhouse Square Conservation Areas and, for the latter, the proposed development would appear as a positive new element in the wider townscape, where visible from within the Smithfield CA.

### **Listed Buildings – Local**

- 9.27 In consideration of the listed buildings assessed, the proposed development will have no adverse effect on the settings of Nos. 25 and 27 Farringdon Road, Nos. 51—53 Charterhouse Street and Smithfield Poultry Market. The new development in the existing varied urban townscape provides some small changes in context but these are considered to be beneficial. The proposed lantern draws on the corner turret language of Nos. 25 and 27 Farringdon Road and adds interest to the townscape. For the Viaduct over Farringdon Street, the proposed development adds a positive new element in its wider setting and will not harm heritage significance.

### **Listed Buildings – Landmarks**

- 9.28 The Site is also within the viewing corridors of three London View Management Framework (LVMF) views: namely 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 6A.1 (Blackheath Point) (see Chapter 10). These provide long distance views of the Strategically Important Landmarks of St Paul's Cathedral (Grade I) and the Old Bailey (Grade II\*) which, as landmark and civic buildings have settings of a much larger, city-

scale, with elements (i.e. domes, peristyle) that were designed to be highly visible from longer distances.

9.29 The Site, and Proposed Development, does not contribute to the heritage significance of these strategic heritage assets, however as the Site lies within these three viewing corridors, and as an element of their strategic setting, there is potential for the proposals to impact on the significance of these highly graded heritage assets via change within these protected views. Turley has assessed that “these considerations are strategic and based upon visual impact ... and, in this context, are assessed as part of the views analysis.” We have considered this here to assess against heritage policy.

9.30 The site appears in the verified views within the HTVS as follows:

- View 2 – London Panorama: Parliament Hill (from viewpoint 2A.1 towards St Paul’s Cathedral) – the site lies within the mid-ground of the view and appears between the dome and western towers of St Paul’s Cathedral as part of the miscellany of roofs. The uppermost part of the lift overruns breach the Landmark Viewing Corridor by a maximum of 652mm. As evidenced in the Verified Views provided in the HTVS, the breach is imperceptible to the human eye and, even with magnification, barely perceived. There would be no material impact on the appreciation of the Cathedral itself, and the dome of the Old Bailey will remain fully visible and legible. The development appears well below the peristyle of the Cathedral and western towers remain fully visible and are not occluded. Turley concludes that, *“The overall effect is slight, less than substantial harm, at the very low end of the spectrum in NPPF terms, arising from minimal and barely discernible change to the wider setting of St Paul’s Cathedral.”*
- View 3 – London Panorama: Kenwood (from viewpoint 3A towards St Paul’s Cathedral) – the site lies within the mid-ground of the view and appears to the

right-hand side of the western towers of St Paul's Cathedral. The uppermost part of the lift overrun breaches the Landmark Viewing Corridor by 98mm. Again, the breach is imperceptible to the human eye and barely perceived at greater magnification. The western towers remain fully visible and are not occluded. Turley concludes that, *"The overall effect is slight, less than substantial harm, at the very low end of the spectrum in NPPF terms, arising from minimal and barely discernible change to the wider setting of St Paul's Cathedral."*

- View 6 – London Panorama: Blackheath Point (from viewpoint 6A towards St Paul's Cathedral) – the site lies at the extreme right-hand edge of the background wider setting consultation area. The proposed development would breach wider setting consultation area by 5.31m. The views tested illustrate that the upper elements of the building, insofar as perceptible at this range, would appear as part of the surrounding roofscape, distant from the Cathedral. Turley concludes that, *"The Proposed Development would therefore preserve the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers and have a neutral effect."*

9.31 Turley considers that here is some very slight and limited less than substantial harm, at the very low end of the spectrum in NPPF terms, imperceptible to the human eye given the relative extent of the technical breach of the Proposed Development into the views. The very slight harm arises from the minimal and barely discernible change to the wider setting of the Grade I listed St Paul's Cathedral and Grade II\* listed Old Bailey through technical breaches of the Landmark Viewing Corridors of two identified LVMF views and intrusion into the background consultation area of the view from Blackheath. The distinctive features and silhouettes of both buildings are not obscured or affected in any way.

9.32 Less than substantial harm to heritage assets must be accorded considerable weight and importance (NPPF paragraph 212). The proposals have minimised and mitigated

this heritage harm where possible, through the design process through reducing the tallest parts of the building (the two lift overruns) to their minimum level. Where less than substantial harm is identified paragraph 215 of the NPPF is engaged and requires that such harm should be weighed against the public benefits of the proposals, including where appropriate securing the optimum viable use of the asset(s).

9.33 The term “public benefit” is defined in the PPG (Historic Environment, paragraph 20) as anything that delivers economic, social or environmental progress as described in the NPPF (paragraph 8). Public benefits should flow from the development and be of a scale to be of benefit to the public at large, however, such benefits do not always have to be visible or accessible to the public to be genuine public benefits.

9.34 The public benefits which would be brought about by the scheme include the following, many of which are explored in detail in the Regeneration Statement and Employment and Training Strategy prepared by Volterra:

- a. Architectural and design quality: these are core NPPF planning principles and can be part of a rounded offer of public benefits. The proposed scheme by DSDHA achieves a more considered design solution than the existing building and is more appropriate in the settings of surrounding heritage assets and the townscape.
- b. Economic benefits of the scheme for the public occur both during construction and once the building is operational. These include:
  - £850 local spend each year by construction works
  - Up to £2.9m additional worker expenditure annually once operational
  - Up to £3.4m in annual business rates



- £99.5m of Gross Added Value expected to be generated by the Proposed Development per year with an uplift in tax revenues of up to £39.8m per year.
- c. Jobs benefits of the scheme for the public including:
- 280 construction jobs supported for the 27 month construction period;
  - Up to 430 net additional jobs arising from the Proposed Development;
  - Up to 25-45 new jobs expected to be taken up Camden residents;
- d. Training and local employment benefits to be delivered by the scheme including:
- 25 apprenticeships and 10 work placements to be provided.
- e. Jewellery Workspace: the provision of 520 sqm of high quality, truly affordable jewellery workspace within Hatton Garden
- f. The provision of additional greenery across the building which provides benefits to the public with regards to visible softening and greening, improved air quality and habitats;
- g. Substantial increase in the ecological value of the site with the provision of new habitat creation and the provision of species-specific enhancement including bird and bat boxes and an Urban Greening Factor of 0.3;

- h. The provision of car free development which encourages sustainable transport modes, including the provision of new cycle parking and end of journey facilities; and
- i. Significant enhancements to the accessibility of the building.

9.35 It is considered that the public benefits emanating from the Proposed Development would provide a clear and convincing justification and outweigh any perceived harm that arises to the setting of the identified heritage assets.

9.36 In relation to the distant, landmark listed buildings of St Paul’s Cathedral and the Old Bailey we therefore consider the, *“very slight and limited less than substantial harm, at the very low end of the spectrum in NPPF terms,”* identified by Turley is entirely balanced by the substantial public benefits generated by the proposed development.

9.37 Additionally, the proposals would preserve and enhance the character and appearance of the Hatton Garden Conservation Area, within which the site lies, and would cause no harm to the settings of the Smithfield and Charterhouse Square Conservation Areas. The proposals would not harm the setting of nearby listed buildings.

9.38 Overall, we consider that the development would accord with the policies of Camden’s Local Plan and The London Plan (March 2021). The proposals would also be in accordance with the statutory duties set out in Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the heritage policies of the NPPF.

## 10. Townscape and Views

- 10.1 This section considers the development proposals against relevant national, regional, and local heritage planning policy and guidance relating to townscape and views.

### **Townscape & Views – Policy**

- 10.2 Paragraph 135 of the NPPF notes that planning policies and decisions should ensure that developments (inter alia) add to the overall quality of the area over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space); and create places that are safe, inclusive and accessible and which promote health and well-being.
- 10.3 At the regional level, London Plan Policy HC3, Strategic and Local Views, outlines a list of designated Strategic Views and states that development proposals must be assessed for their impact on a designated view if they fall within the setting of that view. A strategically important landmark is the Palace of Westminster which holds a protected vista composed of landmark viewing corridors.
- 10.4 Policy HC4 advises that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

- 10.5 Policy HC4 goes on to add that development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.
- 10.6 The London View Management Framework (“LVMF”) SPG was updated and published in March 2012. It was created to provide additional clarity and detail to the policies of The London Plan that deal with the management of London’s views.
- 10.7 Within the Camden Local Plan, the importance of views is recognised within Policy D1 (Design) with LBC requiring that development preserves strategic and local views (part m).

### **Townscape – Assessment**

- 10.8 Throughout the design development process, Turley has provided townscape advice. Within their HTVS, an appraisal of the local visual context and visual amenity was undertaken to assess the likely effects of the Proposed Development on the existing townscape and visual receptors.
- 10.9 The Site is at the important intersection between three authorities (LB Camden, the City of London and LB Islington) and two major roads (Farringdon Road and Charterhouse Street). Turley has identified Areas of Special Townscape Character (ASTC) are those areas of townscape, which have been identified by the Council as being of particularly high quality. As previously identified, the Site is located within the Hatton Garden Conservation Area and is within the vicinity of two others. Accordingly, the 3 ASTCs have been identified within the vicinity of the Site, with each sharing broadly common features and general characteristics:
- ASTC1 – Hatton Garden Conservation Area.
  - ASTC2 – Smithfield Conservation Area.

- ASTC3 – Charterhouse Square Conservation Area.

The characteristics of each area is described detail in Section 4 of the HTVS.

10.10 Turley has assessed the ASTC's in relation to a number of townscape elements.

- Land use – the activated frontages, and jewellery workspace use in particular, will provide townscape benefits to ASTC1.
- Urban Form – the additional scale of the building and varied roof levels will have Neutral townscape impacts are anticipate to all ASTCs. The proposed lantern at roof level will provide a significant townscape benefit to ASTC1 and to the wider context of ASTC2 and ASTC3.
- Townscape condition and quality of materials provide benefits for ASTC1 and the wider context of ASTC2.
- Movement Connectivity and Public realm – benefits are provided to ASTC1 with the number and locations of new entrances to the building and visual opening up of the steps to Saffron Hill.

### **Local Views – Assessment**

10.11 The assessment as a whole was informed by nine accurate visual representations ('verified views') informed by a Zone of Theoretical Visibility exercise – six local views and three LVMF views. The locations were agreed with LBC officers. Two additional views were suggested by the GLA in their pre-application response (further east along Charterhouse Street and from Blackfriars Bridge), however the visual effects of the proposed development are already illustrated by the chosen representative views at closer-range. The identified 6 local views, and the effect of the proposed development are:

1. Ludgate Circus – Beneficial effect
2. Holborn Viaduct – Beneficial effect
3. Holborn Circus – Beneficial effect

4. St Cross Street (junction with Saffron Hill) – Beneficial effect
5. Farringdon Road (north by the Farringdon Station) – Beneficial effect
6. Charterhouse Street (east, adjacent to Meat Market) – Beneficial effect

10.12 The identified townscape and visual impact on these viewpoints have been assessed as Beneficial by Turley, with further detail on each view in the HTVS.

### **LVMF Strategic Views – Assessment**

10.13 The Site is located within the following three strategic views identified in the London Views Management Framework (LVMF), 2012:

- London Panorama: Parliament Hill, LVMF View 2 (from viewpoint 2A.1 towards St Paul’s Cathedral)
- London Panorama: Kenwood, LVMF View 3 (from viewpoint 3A towards St Paul’s Cathedral)
- London Panorama: Blackheath Point, LVMF View 6 (from viewpoint 6A towards St Paul’s Cathedral)

10.14 The Proposed Development has been assessed for its impact on the views that they fall within, in line with London Plan Policy HC3, Strategic and Local Views, by Turley.

10.15 The site appears in the views as follows:

- LVMF View 2 (Parliament Hill, viewpoint 2A.1) – the site lies within the mid-ground of the view and appears between the dome and western towers of St Paul’s Cathedral as part of the miscellany of roofs. The uppermost part of the lift overruns breach the Landmark Viewing Corridor by a maximum of 652mm. The breach is imperceptible to the human eye and, even with magnification, barely perceived. There would be no material impact on the appreciation of

the Cathedral itself, and the dome of the Old Bailey will remain fully visible and legible. The development appears well below the peristyle of the Cathedral and western towers remain fully visible and are not occluded. Turley concludes there is an overall ‘Slight adverse’ effect.

- LVMF View 3 (Kenwood, viewpoint 3A) – the site lies within the mid-ground of the view and appears to the right-hand side of the western towers of St Paul’s Cathedral. The uppermost part of the lift overrun breaches the Landmark Viewing Corridor by 98mm. Again, the breach is imperceptible to the human eye and barely perceived at greater magnification. The western towers remain fully visible and are not occluded. Turley concludes there is an overall ‘Slight adverse’ effect.
- LVMF View 6 (Blackheath Point, viewpoint 6A) – the site lies at the extreme right-hand edge of the background wider setting consultation area. The proposed development would breach wider setting consultation area by 5.31m. The views tested illustrate that the upper elements of the building, insofar as perceptible at this range, would appear as part of the surrounding roofscape, distant from the Cathedral. Turley concludes there is an overall ‘Neutral’ effect.

10.16 The effect of the proposals on the LVMF Strategic Views is considered to be Slightly Adverse or Neutral by Turley.

10.17 The proposals preserve viewers’ ability to recognise and to appreciate the Strategically Important Landmark of St Paul’s Cathedral within the views in line with London Plan Policy HC4.

10.18 Policy HC4 goes on to add that development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.

- 10.19 The application proposals do not accord with part of of Policy HC4 as the Proposed Development exceeds the threshold height of a Landmark Viewing Corridor, constituting a technical breach of this policy. As set out in the views assessment undertaken by Turley, this breach is minor in nature and is virtually imperceptible from the human eye. The DAS sets out further information on the lift overruns which breach the viewing corridors from the viewpoints to the north at Kenwood and Parliament Hill. Their location is unavoidable given the retention of the existing foundations which support the existing building over a number of underground constraints. The lift overruns have been minimised by DSDHA and the technical team during the design process and have decreased from the date the pre-application meeting was held with the GLA.
- 10.20 In terms of design quality and appropriateness to context, the proposals address Camden Local Plan Policy D1, by; respecting local context and character; comprising details and material of high quality that complement local character; integrate with surroundings; incorporate high quality landscape design; and preserve strategic and local views.
- 10.21 Overall, the Proposed Development gives rise to significant beneficial townscape effects. The Proposed Development would demonstrably improve the appearance, character and function of the townscape, in accordance with the Development Plan.



## 11. Landscaping and Ecology

- 11.1 This section considers the development proposals against relevant national, regional, and local heritage planning policy and guidance relating to designated heritage assets

### **Landscaping and Public Realm - Policy**

- 11.2 NPPF paragraph 20 encourages strategic polices to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.
- 11.3 NPPF paragraph 135 promotes that planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 11.4 At paragraph 135(f) the NPPF stipulates that it is important to create places that are safe, inclusive and which promote health and well-being.
- 11.5 London Plan Policy D5 sets out the Mayor's approach to inclusive design and requires development proposals to achieve the highest standards of accessible and inclusive design.
- 11.6 London Plan Policy D8 sets out the requirements that development proposals should consider in regard to public realm. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should

be carefully considered and well designed in order to minimise intrusive lighting infrastructure and reduce light pollution.

- 11.7 London Plan G1 (Green Infrastructure) states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- 11.8 Furthermore, Policy G5 of the London Plan explains 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. An Urban Greening Factor ('UGF') target score of 0.3 has been set by the Mayor for new, predominately commercial developments.
- 11.9 Policy G7 of the London Plan explains that the planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 11.10 Local Plan Policy D1 states that the Council will seek to secure high quality design which includes:
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
  - l. incorporates outdoor amenity space;

### **Landscaping - Assessment**

- 11.11 The Site currently has no landscaping or public amenity space and does not provide a positive approach to a high-quality, inclusive, accessible and co-ordinated commercial space.
- 11.12 The majority of the landscaping proposals are designed into the building terraces which enhance the Hatton Garden connection and include planting that reflect the area's character. The proposals have also been deliberately designed to be visible at street level where possible.
- 11.13 The terraces are differentiated between small, medium and large which dictate the functionality, balancing private and communal spaces while optimising usability and integrating greenery. These terraces range from having a capacity up to 10 people, to a capacity able to accommodate larger office events.
- 11.14 The terraces are located as follows:
- Bridge Gardens on levels 2 to 5;
  - Level 07: 1no. Cloister Garden and 1no. Ornamental Garden;
  - Level 08: 1no. Cloister Garden and 1no. Ornamental Garden;
  - Level 09: 4no. Ornamental Gardens;
  - Level 10: 1no. Productive Garden and 1no. Cloister Garden;
  - Roof Level: Non-accessible Green roof;
- 11.15 The majority of the accessible terraces face Farringdon Road and offer generous planting which is visible from street level.

- 11.16 The Proposed Development will provide an appropriate provision of high-quality, safe and accessible external amenity for the future occupants of the Site.

### **Urban Greening**

- 11.17 As the current site contains no urban greening, the aim of the landscaping strategy is to the introduce of areas of greening to significantly enhance the Urban Greening Factor (UGF).
- 11.18 The planting strategy is driven by the different themed gardens and comprises:
- Perimeter planting
  - Central island planting
  - Green roof
  - Trees
- 11.19 In accordance with London Plan Policy G5, the total greening of the Site has been calculated, considering the surface cover type and associated factor. In total, the Proposed Development would provide a significant uplift in greening and biodiversity, resulting in an UGF of 0.3 which meets the Mayor’s recommended 0.3 for commercial schemes.
- 11.20 The green elements have been carefully and thoughtfully considered to maximise biodiversity, mitigate urban heat, and improve air quality. Permeable surfaces further support sustainable drainage, reinforcing the project’s commitment to a resilient and high-quality landscape.

## **Ecology and Biodiversity**

- 11.21 Arbtech has prepared a Preliminary Ecological Appraisal and Preliminary Roost Assessment in support of the application.
- 11.22 The report demonstrates that no ecological constraints were identified for the Proposed Development and that no further surveys have been recommended. The roof of the building provides some potential value for nesting gulls during the breeding season, which is common for buildings of similar height in the area. Therefore, precautionary checks for nesting birds should be conducted prior to any works commencing, during this time.
- 11.23 Due to the site's location, physical barriers, and lack of vegetation within or near the site, there is no potential for impacts on other ecological receptors, either on-site or in the wider landscape
- 11.24 Arbtech have also confirmed, in their BNG Exemption Statement, that the site currently has less than 25sqm of biodiversity and is thereby exempt from the statutory requirement for the development to provide a biodiversity net gain as it falls within the de minimus category. However, a key principle from the outset has been to maximise opportunities for greening, thus increasing the biodiversity value of the area.
- 11.25 Arbtech have produced a Landscape and Ecological Management Plan (LEMP) with the aim of providing an ecological enhancement focussed on achieving realistic gains in biodiversity. The LEMP confirms the applicant's commitment to maintain the site's ecological features and ensure that the enhancements are not left unmanaged through its lifetime.

## Summary

- 11.26 The Proposed Development has sought to maximise the provision of amenity space and green infrastructure, whilst also meeting the other objectives for the Site in terms of a commercial use. A robust landscaping strategy has been developed that provides for a range of functions, including small to large terrace for different occasions whilst providing a significant uplift in urban greening and biodiversity value, and sustainable urban drainage measures.
- 11.27 Overall, the Proposed Development would successfully deliver a range of accessible terraces that cultivate connections, a quality of life and health and wellbeing, in accordance with the objectives and policies at a national, regional and local level.

## 12. Energy and Sustainability

- 12.1 This section assesses the proposals in terms of energy and sustainability against the relevant planning policy and guidance documents.

### **Energy and Sustainability – Policy Context**

- 12.2 Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives: an economic objective, a social objective, and an environmental objective. The latter is in place to contribute to protecting and enhancing the natural, built and historic environment including making effective use of land, helping to improve biodiversity, minimising waste and pollution and mitigating and adapting to climate change including moving to a low carbon economy.
- 12.3 Section 14 and Paragraph 161 of the NPPF identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 12.4 Paragraph 164 of the NPPF states that development should help to reduce greenhouse gas emissions through its location, orientation, and design. Paragraph 166 states that in determining planning applications, local planning authorities should expect new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

- 12.5 The Mayor’s vision in the London Plan is to ensure London becomes an exemplary, sustainable world city whilst allowing London to grow in a responsible and considered socioeconomic manner.
- 12.6 London Plan Policy SI 2 (Minimising greenhouse gas emissions) seeks to ensure that new major development be net zero-carbon through the reduction in greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- Be lean: use less energy and manage demand during operation.
  - Be clean: exploit local energy resources and supply energy efficiently and cleanly.
  - Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
  - Be seen: monitor, verify and report on energy performance
- 12.7 Policy SI 2 (B) explains that major development proposals should include a detailed Energy Strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- 12.8 Policy SI 2 (C) explains that a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. Where these targets cannot be met on site, a financial contribution to the Council’s Carbon Off-setting Fund will be required as per London Plan Policy SI2.
- 12.9 London Plan Policy SI 3 (Energy infrastructure) sets out how energy infrastructure and effective energy supply (‘masterplan’) solutions can be delivered across London in different spatial contexts. The supporting text at Paragraph 9.3.2A recognises the



limitations and impacts arising from combined heat and power (CHP) systems and the increasing evidence of adverse air quality impacts. Therefore, the supporting text is clear at Paragraph 9.3.4 that “developments should connect to existing heat networks, wherever feasible”.

- 12.10 Policy SI 4 (Managing Heat Risk) of the London Plan seeks to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure of new development proposals. Policy SI4 states this could be demonstrated through an Energy Strategy in accordance with the cooling hierarchy.
- 12.11 In July 2019, Camden declared a climate emergency and subsequently published a Climate Action Plan setting out how the Council will work towards zero carbon by 2030.
- 12.12 Local Plan Policy CC1 ‘Climate change mitigation’ states the council will promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; and part e) states that the council will require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. Supporting text paragraph 8.17 adds that this should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Paragraph 8.19 of the Plan states that the Council will expect developers to consider the service life of buildings and their possible future uses to optimise resource efficiency.
- 12.13 Local Plan Policy CC2 1.15 Policy CC2 of the Local Plan requires all development to be resilient to climate change by promoting sustainable design and construction measures. Developments involving conversions of over 500sqm should achieve BREEAM “Excellent” non-domestic buildings.

- 12.14 Policy CC3 of the Local Plan seeks to reduce flood risk and maximise water efficiency through the use of Sustainable urban Drainage Systems (SuDS) to achieve greenfield runoff rates where feasible.
- 12.15 In January 2021 LBC updated the Camden Planning Guidance (CPG) ‘Energy Efficiency and Adaptation’ to ensure that the Council’s commitment to reducing carbon emissions is achieved. This document includes a cascade regarding the demolition of existing buildings and whole life carbon cycles.

### **Energy and Sustainability - Assessment**

- 12.16 An Energy and Sustainability Statement has been prepared by Sweco, alongside a Circular Economy Statement and Whole Life Carbon Assessment.
- 12.17 The Energy Statement and Sustainability Strategy summarise the key measures proposed to reduce the Proposed Development’s carbon emissions. The Energy Statement and Sustainability Statement identify that the Proposed Development will adopt a sustainable approach during its complete lifecycle including design, construction and operational stages.
- 12.18 From the outset, the project aspiration is to deliver a showcase project for sustainable refurbishment in the London Borough of Camden that revitalises the existing building into a modern, futureproofed sustainable development. Retaining as much of the existing structure as possible is at the heart of the proposal and focusing on less material in construction to deliver low carbon outcomes.
- 12.19 The Energy Statement has been structured in accordance with GLA’s energy hierarchy: Be Lean, Be Clean, Be Green and Be Seen. The proposals for the Proposed

Development have been developed in accordance with the desire to achieve an energy efficient and sustainable development.

12.20 Be Lean: the applied measures to reduce energy demand part of the 'Be Lean' stage is based on the following strategies:

- "Fabric First approach" – designing of a high thermal performing building envelope, with optimised glazing ratio for daylighting, and solar gains management during summer, and winter.
- Promoting energy savings and wellness initiatives through robust metering, and control strategy.
- Energy-efficient equipment will be used throughout the development to reduce energy consumption; and
- Setting an ambitious energy use intensity target (EUI) for operational energy.

The 'Lean' energy efficiency measures, described in Sweco's report, are calculated to reduce regulated carbon dioxide emissions of the Proposed Development by 31%, compared to Part L 2021.

12.21 Be Clean: An investigation into the availability of existing and proposed district heating networks has been carried out for the Proposed Development including correspondence with Citigen. The Energy Statement prepared states that after careful selection of appropriate servicing strategies, and plant selection, the design team agreed the scheme will primarily utilise a roof mounted VRF system to serve the building's heating and cooling demand and to not connect to the DHN due to the underground congestion beneath Farringdon Road. A plant room has also been provided on the lower ground floor as part of future proofing for future connection.

12.22 Be Green: renewable energy technologies have been investigated to establish their suitability and feasibility. The conclusion is that heat pumps and photovoltaics panels

are the most suitable technology. The 'Green' measures described reduce the regulated carbon dioxide emissions of the commercial areas by 8%.

- 12.23 Be Seen: A requirement for all major development to 'be seen' i.e., to monitor and report its energy performance post-construction to ensure that the actual carbon performance of the development is aligned with the Mayor's net zero-carbon target. This guidance document explains how to meet this requirement. Effective energy metering in line with Be Seen requirements would be enabled by the provision of suitable infrastructure within the Building Management System.
- 12.24 In terms of the carbon offsetting, the contribution has been calculated as per The London Plan (2021) as well as LBC's CPG which aligns the price per tonne of carbon with the GLA's pricing strategy: the rate of £95 per tonne of CO<sub>2</sub> per year (or £2,850 over a period of 30 years (£95 x 30 years)).
- 12.25 In terms of sustainability, further details are provided within the Sustainability Statement, prepared by Sweco. The Proposed Development is targeting a BREEAM rating of 'Excellent' demonstrating it incorporates exemplary standards of sustainable and inclusive urban design and architecture.
- 12.26 A BREEAM Pre-Assessment has been carried out for the Proposed Development. The current pre-assessment estimates provide a targeted scores of approximately 80.89% for the commercial floorspace with an aspiration for Outstanding (target score of 90.27%).
- 12.27 The BREEAM Pre-Assessment of the Proposed Development demonstrates that the design will holistically incorporate sustainable principles into the full range of sustainability aspects covered by BREEAM: management, health & wellbeing, energy, transport, water, materials, waste, land use & ecology and pollution. Formal assessments will take place once the tender documentation is produced and will

require submission of a full evidence bundle from the Applicant and the design team to show compliance with the credits.

- 12.28 Consideration has also been given to whole life carbon and the circular economy which are outlined further within the detailed Circular Economy Statement and Whole Life Carbon Assessment, both prepared by Sweco.

### **Whole Life Carbon and Circular Economy**

- 12.29 In line with the requirements of LBC CPG ‘Energy Efficiency and Adaptation’ (2021) a Whole Life Carbon Assessment (‘WLCA’) has been prepared by Sweco and submitted in support of this application. The WLCA sets out opportunities for how embodied carbon can be reduced within the Proposed Development. This would be subject to detailed design.

- 12.30 The current analysis results in the following estimates:

- Upfront carbon [A1-A5] 907 kgCO<sub>2</sub>e/m<sup>2</sup> GIA
- Life-cycle embodied Carbon [A-C excl. B6&B7] 1,622 kgCO<sub>2</sub>e/m<sup>2</sup> GIA
- Whole life carbon [A-C incl. B6&B7] 2,919 kgCO<sub>2</sub>e/m<sup>2</sup> GIA

- 12.31 The following opportunities are currently under consideration to reduce embodied carbon:

- Reducing the embodied carbon in all new concrete elements will be a priority.
- The new façade systems will be constantly challenged on material efficiency, but this is closely linked to the operational performance.
- Use of novel plasterboards and alternatives will be explored by the project team at the next stage of design and into specification.
- Investigate use of recycled raised access flooring panels.

- The submission of CIBSE TM65 data as a minimum from the supply chain for services is seen as mandatory for this project and will be reflected in all of Sweco's relevant MEPH specifications.

The approach to WLCA is therefore in line with regional and local planning policies.

### **Circular Economy**

12.32 In line with London Plan Policy SI7, a Circular Economy Statement prepared by Sweco UK has been submitted with this application. The Circular Economy Statement outlines the circular economy measures that are being targeted within the Proposed Development.

12.33 An innovative approach is being taken to minimising waste and carbon emissions through deconstruction and construction, identifying opportunities to reuse, recycle and upcycle building materials

12.34 The key circular highlights are as follows

- 90% - Specifically with regards to demolition waste – Reuse and Recycling will be prioritised over Recovery and Landfill waste destinations.
- 95% - The Proposed Development will ensure each stage has a high level of reuse and recycling where the targeted rates for diversion from landfill are reported when available.
- 20% - The Proposed Development is targeting recycled content rates for the new materials ensuring secondary are chosen above virgin materials.
- 95% - It is anticipated that the proposed materials for the Development will have a high anticipated useful end of life.

- 12.35 The Proposed Development therefore complies with planning policy at all levels in respect of energy and sustainability.

### **Overheating and Cooling – Assessment**

- 12.36 In respect of overheating, the design has followed the cooling hierarchy principles as a means of reducing the amount of solar and internal gains, reducing the risk of overheating and subsequently reducing the demand placed upon the systems to condition the space.
- 12.37 The GLA's Energy Assessment Guidance requires that developments report the active cooling demand predicted by the energy modelling compliance tool.
- 12.38 Those tools are used for compliance, with a rigid methodology, and the mechanical design will better inform the cooling demand within the occupied areas of the development.
- 12.39 The following measures have therefore been applied to reduce the cooling loads from outset:
- Optimised glazing ratio to significantly reduce solar gains and achieve adequate daylighting.
  - External shading elements dimensioned to reduce solar heat gains to the building perimeter, and particularly the office accommodation.
  - Consideration of surrounding buildings to cast shadows on the lower levels.
- 12.40 The overheating analysis demonstrates that a free-running building relying solely on natural ventilation scenario would not be able to reach adequate levels of thermal comfort (as outlined in CIBSE TM52 criteria for predominately naturally ventilated

buildings) due to the deep floor plan of the building which reduces the ventilation effectiveness.

- 12.41 Subsequently, the commercial floorspace areas would comply with the criteria for the current DSY1 scenario and future weather conditions when the cooling set point is set to 23°C. As specified by the M&E design, this set point sits within the band 24°C  $\pm$ 2 with an average cooling capacity of 55 W/m<sup>2</sup> and a maximum cooling capacity of 95 W/m<sup>2</sup>. Retail areas are also performing well for both summer and winter operative temperatures checks.
- 12.42 Therefore, the Proposed Development is considered to accord with the relevant regional and local planning policies.



## 13. Transport and Servicing

- 13.1 This Chapter assesses the proposed transport and an associated servicing arrangements against the relevant planning policy and further guidance documents.

### **Transport and Servicing - Policy**

- 13.2 Chapter 9 of the NPPF explains that the Government's objective is for significant development to be focused in locations which are or can be made sustainable by maximising opportunities a genuine choice of public transport and active travel solutions. Paragraph 109 seeks to promote sustainable transport and states that “transport issues should be considered from the earliest stages of plan-making and development proposals.”
- 13.3 Paragraph 115 of the NPPF states that development proposals should take appropriate opportunities to promote sustainable transport, provide safe and suitable access for all users; and ensure any significant impact on existing transport networks can be effectively mitigated.
- 13.4 Paragraph 116 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 13.5 Paragraph 117 of NPPF confirms applications for developments should:
1. Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitate 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.

4. Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
5. 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.
6. Allow for the efficient delivery of goods, and access by service and emergency vehicles.
7. Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations.

13.6 London Plan policy T1 states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

13.7 Policy T4 states the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

13.8 London Plan policy T5 (part A) requires that development proposals help remove barriers to cycling and create a health environment in which people choose to cycle. London Plan policy T5 (B) states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities would cater for larger cycles, including adapted cycles for disabled people.

- 13.9 The policy sets out that developments should provide cycle parking at least in accordance with the minimum standards set out in the Plan.
- 13.10 London Plan Policy T6 (Car Parking) states that, “car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car lite’). Car-free development has no general parking but should still provide disabled parking in line with Part E.
- 13.11 Policy T6 also explains that appropriate provision should be made for disabled persons parking for Blue Badge holders. London Plan policy T6.1 ‘Residential parking’ states that new residential development should not exceed the maximum parking standards (as per table 10.3). Disabled persons parking should comply with Policy T6.1 part H.
- 13.12 London Plan policy T7 Part G states proposals should facilitate safe, clean and efficient deliveries and servicing.
- 13.13 Local Plan Policy T1 ‘Prioritising walking, cycling and public transport’ states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. This includes:
- providing for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development.
  - making provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

- 13.14 Local Plan Policy T2 ‘Parking and car-free development’ states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

### **Transport and Servicing – Assessment**

- 13.15 This application is supported by a Healthy Streets Transport Assessment, Travel Plan, Delivery Service Report and Waste Collection Report; prepared by Momentum, in accordance with national, regional and local development plan policy requirements.
- 13.16 The Site lies in a highly accessible area with a PTAL rating of 6b which indicates an excellent level of accessibility to public transport.
- 13.17 As a result, the vast majority of trips to the Site would be by public transport with the last part of the journey taken by foot or cycle and, in line with policy, and encourages the use of sustainable modes of transport.
- 13.18 The number of trips generated by the Proposed Development are distributed across various modes of transport. The high PTAL of the Site means that the impact of the Proposed Development on public transport is negligible.
- 13.19 The Proposed Development would fully meet the Council’s transport aspirations and current Governmental guidance in respect of sustainable development and will, through its design, continue to encourage the use of sustainable modes of transport.

## Car Parking

- 13.20 Fully in line with Camden Local Plan Policy T2, the proposed development will be car-free.
- 13.21 The Site sits within the Green Badge Zone in Camden. Green Badge holders would therefore be able to park within nearby pay and display parking bays. The nearest of these to the Site are on Greville Street.
- 13.22 Blue Badge holders would be able to park in pay and display bays for up to one hour free of charge within the Green Badge Zone. Outside of the Green Badge Zone, Blue Badge holders will be able to park in nearby pay and display bays including those on Shoe Lane, approximately 70 metres from the Site.

## Cycle Parking

- 13.23 The Local Plan seeks to exceed minimum standards outlined in the London Plan by 20% to encourage the use of sustainable transport modes, such as cycling, which is key in reducing air pollution, congestion and road casualties. In addition, the Proposed Development makes appropriate provision for high-quality end-of-trip facilities including lockers and showers.
- 13.24 The following table summarises the cycle parking provision for the Development:

Land Use	Long-stay	Showers	Lockers
Office	178	18	119
Retail	2	1	2
Jewellery	2	1	2
Total	182	20	122
<b>LBC Additional 20%</b>	<b>218</b>	<b>22</b>	<b>146</b>

- 13.25 It is acknowledged that the Proposed Development should also provide short stay cycle parking, which with Camden's 20% additional provision would total 37 short-stay spaces. However, given the constrained nature of the Site, there is limited scope for short-stay cycle provision. As such, it is proposed to make a financial contribution to LBC in lieu of providing short-stay cycling, which would be secured via the legal agreement.

### **Deliveries and Servicing / Waste**

- 13.26 A Delivery and Servicing Plan has been prepared by Momentum to demonstrate how service vehicle trips to and from the development site will be managed. The strategy ensures that servicing activities are undertaken to ensure that the surrounding highway network is minimally affected by the operation of the Site.
- 13.27 A new single, onsite loading bay is proposed to replace the two existing loading bays. Vehicles would access this bay from Saffron Hill, via Greville Street to the north. The loading bay would have a height restriction of 3.0m and will be able to accommodate a 3.5 tonne panel van with a length of up to 5.4 metres as the largest vehicle.
- 13.28 It is estimated that there will be a total number of 23 delivery and servicing trips per day. Momentum has also produced a management strategy to reduce the number of vehicles travelling to the Site.
- 13.29 The strategy would limit the number of hours that vehicles can access the Site and vehicles would be required to book their visit to the Site via a booking system.
- 13.30 It is proposed that all waste generated by all building occupiers is stored in a single shared waste store, located on the lower ground floor, adjacent to the proposed loading bay. It is proposed that this waste store accommodate two days of waste

generation. This allows for daily collection of each waste stream, plus contingency should a collection be missed.

- 13.31 It is proposed that waste will be collected daily by a private contractor. Although the southern portion of Saffron Hill is under private ownership of 17 Charterhouse Street. No. 19 Charterhouse Street has rights of access over the private land for building maintenance and servicing the building.
- 13.32 Prior to the arrival of the waste collection vehicle, the Facilities Management (FM) team would position the bins at the loading bay entrance for ease of collection. All waste collection vehicles would book an arrival time using the aforementioned proposed booking system.
- 13.33 The proposed delivery and servicing arrangements have been robustly assessed and have proposed a management strategy which is considered acceptable.

### **Construction and Logistics**

- 13.34 A draft Construction/Demolition Plan has been prepared by Mace and demonstrates the developer's intent to minimise construction impacts and relates to all construction activity on and off site that impacts on the wider environment.
- 13.35 The Plan demonstrates that construction materials can be delivered, and waste removed in a safe, efficient and sustainable way. It highlights where there may be opportunities to reduce, re-time or consolidate deliveries, particularly during peak periods to help cut congestion. It also looks at sustainable travel measures such as using greener vehicles and encouraging construction workers to travel by sustainable or active travel modes.

- 13.36 It is expected that a suitably worded condition will be appropriate to secure more details of the construction management process following appointment of principal contractor.



## 14. Daylight, Sunlight and Overshadowing

- 14.1 This section of the Statement reviews the daylight and sunlight implications of the Proposed Development on neighbouring properties. A daylight/sunlight assessment has been undertaken by Point 2 in support of this Application.

### **Daylight and Sunlight - Policy**

- 14.2 At the national level, the Building Research Establishment (BRE) Report 'Site Layout Planning for Daylight and Sunlight 2011' ('the BRE Guidelines') comprises tests and guidance to assess the impact that a new development will have on the light to neighbouring properties. The tests within the aforementioned report are given as advice and are not mandatory. As such these are not planning policy.
- 14.3 The examples given with the BRE guide can generally be applied to any part of the UK, from urban to rural locations. The BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of a specific site. Clearly there would be a higher expectation for daylight and sunlight in a rural environment than in an urban location. Therefore, the BRE Guidelines need to be applied sensibly when assessing daylight and sunlight to allow for a more practical approach to London urban design.
- 14.4 The NPPF at Section 12 supports the development of high-quality buildings and those which promote good design principles and create places that provide a high standard of amenity for existing and future users (Paragraph 135(f)).
- 14.5 London Plan policy D6 states that the design of the 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.

- 14.6 Local Plan Policy A1 ‘Managing the impact of development’ states that the Council seeks to protect the quality of life of occupiers and neighbours. The factors considered include: visual privacy, outlook; and sunlight, daylight and overshadowing.

### **Daylight and Sunlight – Assessment**

- 14.7 The impact of the Proposed Development on daylight, sunlight and overshadowing of neighbouring properties/sensitive receptors has been assessed in the supporting Daylight and Sunlight Report, prepared by Point 2 which is submitted with the application, and summarised here.
- 14.8 Assessments have been undertaken against the BRE guidelines using the Vertical Sky Component (VSC), No Sky Line (NSL) and Annual Probable Sunlight Hours (APSH) tests. Two relevant properties have been assessed, St Andrew’s House and 17-23 Farringdon Road.
- 14.9 The BRE guidelines make it clear that the recommended targets are not mandatory, and alternative targets can be appropriate depending on the Site and its location. The existing site is already built up and the VSC of St Andrew’s House is currently heavily compromised by external walkways above all levels, ranging from 1% on the ground floor and 5-12% on the third floor. Therefore, any meaningful development will likely result in very small changes to VSC which appear as greater percentage reductions than set out in the BRE guidelines.
- 14.10 Subsequently, Point 2 carried out a further assessment which calculated the impacts on daylight and sunlight where the balcony is removed from the test in order to

demonstrate that it is the existing structure which effects the light received by these levels, rather than the Proposed Development. Therefore, the surroundings were assessed on this basis, with the existing effect of the balconies and walkways removed.

- 14.11 St Andrew's House is a 4-storey Grade II listed building with 19 flats, of which some have been changed into office use. It is located to the west of the Site. In total, 56 windows within 36 rooms have been assessed. When the VSC method is considered (methodology set out in paragraph 13.10 above), the absolute loss would be imperceptible. With regard to NSL, all rooms assessed in the northern part of the block will be in line with the existing levels in the southern part of the block.
- 14.12 Nos. 17-23 Farringdon Road is a 7-storey mixed-use property located directly north of the Site. It comprises retail floor space, office and residential accommodation on the upper floors. In total, 15 windows serving 15 rooms have been tested. Using the VSC method, 14 of the 15 windows tested will fully comply with BRE guidelines, and the 1 that falls short does so only marginally, and would still achieve a VSC of 22.25% post-development, which is considered very good in an urban context. When NSL is tested, all rooms would fully comply with the BRE guidelines.
- 14.13 In conclusion, the Daylight and Sunlight Report, prepared by Point 2, demonstrates that the existing effect of balconies and walkways is the main factor in reductions in daylight and sunlight to St Andrew's House. Given the constrained nature of the Site, it is not unexpected that the Proposed Development will also cause further derogations beyond BRE guidelines. However, by removing the overhangs, the actual, or absolute, loss in compromised area the scheme performs very well in in daylight and terms and is considered acceptable.

## 15. Amenity

- 15.1 This Chapter assesses the proposed transport and an associated servicing arrangements against the relevant planning policy and further guidance documents.
- 15.2 This section assesses the potential effects of the Proposed Development in terms of amenity, which includes air quality and noise. The technical assessments for these matters are provided within the accompanying Environmental Statement

### **Air Quality – Policy & Assessment**

- 15.3 Paragraph 187 (part e) states that planning policies and decisions should contribute to and enhance the natural and location 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.
- 15.4 Paragraph 199 of the NPPF states planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. It also states that opportunities to improve air quality or mitigate impacts should be identified. It concludes stating planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

- 15.5 London Plan Policy SI 1 (Improving Air Quality) states development proposals must be at least air quality neutral and should not:
- a) Lead to further deterioration of existing poor air quality;
  - b) Create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
  - c) Create unacceptable risk of high levels of exposure to poor air quality
- 15.6 Policy CC4 (Air Quality) of LBC's Local Plan requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 15.7 CPG: Amenity (January 2021) states that all of LBC is a designated Air Quality Management Area (AQMA') due to the high concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). As such all developments are to limit their impact on local air quality.
- 15.8 CPG: Air Quality (January 2021) states that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive').

#### **Air Quality: Assessment**

- 15.9 An Air Quality Assessment has been prepared by Tetra Tech and submitted alongside the application.

- 15.10 This report presents the findings of an air quality assessment undertaken to assess road traffic emissions and construction dust impacts.
- 15.11 During the construction phase, site specific mitigation measures detailed within this assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.
- 15.12 During the operational phase, the long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO<sub>2</sub>) is determined to be 'negligible'. With respect to PM<sub>10</sub> and PM<sub>2.5</sub> exposure, the effect is determined to be 'negligible' at all identified existing sensitive receptor locations. Further, the development trip rate is below the benchmark trip rate and therefore the development can be considered Air Quality Neutral.

### **Noise – Policy**

- 15.13 The NPPF contains guidance on noise management in planning decisions. Paragraph 187 of the NPPF requires planning decisions to contribute 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, among other things, noise. The PPG expands upon these points.
- 15.14 Paragraph 198 of the NPPF is clear that planning decisions should ensure that new development take the likely noise effects (including cumulative effects) resulting from new development into account, to ensure it mitigates and reduces any potential adverse impacts to a minimum – and to avoid noise giving rise to significant adverse impacts on health and quality of life.

- 15.15 London Plan Policy D13 discusses the principles of the Agent of Change. New proposed residential development and other noise sensitive development which is located near noise and other nuisance-generating uses should put in place measures to mitigate and manage any noise impacts.
- 15.16 London Plan policy D14 states that in order to reduce, manage and mitigate noise to improve health and quality of life, development proposals should manage noise by mitigating and minimising the existing and potential adverse impacts of noise.
- 15.17 At local level, the Local Plan policy A4 'Noise and vibration' states that development should have regard to Camden's Noise and Vibration Thresholds (Appendix 3). Planning permission will not be granted for:
- a. development likely to generate unacceptable noise and vibration impacts; or
  - b. development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses

### **Noise – Assessment**

- 15.18 The Applicant has assessed the noise impact of the Proposed Development, and in particular with regards to building service equipment with regards to the surrounding area and noise-sensitive receptors. The Plant Noise Assessment has been prepared by Sweco and contains the full details.
- 15.19 Due to the proposed development being adjacent to noise-sensitive receptors, it has the potential to affect ambient noise levels and therefore noise from plant will need to be controlled.

15.20 The analysis concludes that the appropriate mitigation measures would include plant screen louvres, in level 09 and 09 mezzanine and operational noise limits for the proposed emergency generator.

15.21 Therefore, the proposed development is in accordance with planning policies at levels and is considered acceptable.



## 16. Other Considerations

16.1 This section assesses the development against other relevant material planning considerations. These are as follows:

- Flood Risk and Drainage;
- Crime and Inclusive Design; and

Fire.

### **Flood Risk and Drainage**

16.2 Chapter 14 of the NPPF sets out the sequential approach to planning new development and flood risk. The NPPF seeks to guide development to areas of low flood risk, ideally to Flood Zone 1. Paragraph 181 states that when determining any planning applications, LPAs should ensure that flood risk is not increased elsewhere and where appropriate, applications should be supported by a site-specific flood-risk assessment.

16.3 Further, paragraph 175 sets out that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

16.4 London Plan policy SI 12 'Flood Risk Management' states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk be addressed.

16.5 Policy SI 13 (Sustainable Drainage) explains that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy.

- 16.6 Policy SI 13 (D) explains that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation
- 16.7 Local Plan Policy CC3 'Water and flooding' states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. This includes to utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible. Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

### **Flood and Drainage - Assessment**

- 16.8 The Site is located within EA Flood Zone 1 and is in a critical drainage area. Flood Zone 1 comprises land assessed as having less than 1 in 1000 annual probability from fluvial and tidal sources. A Critical Drainage Area means that any re-development should implement source control and only discharges to sewer at limited run off rates in accordance with new SuDS standards.
- 16.9 The application is supported by a Flood Risk Assessment and Drainage Strategy, prepared by Davies Maguire, which considers the flood risk, mitigation measures and drainage strategy of the Proposed Development in more detail.
- 16.10 The British Geological Survey also shows that the Site geological formation comprises of London Clay, known for its low permeability and poor infiltration rates for water; and Alluvium, a clay, silt, sand and gravel deposit.
- 16.11 Saffron Hill has the higher risk of flooding as it lies a level lower than Charterhouse Street and Farringdon Road. There is a high risk of surface water flooding at the

southern end of Saffron Hill and could affect the lower ground floor area. All finish floor levels should be set to at least the same level as the back of the footpath and ensure a fall is provided, falling away from the building line. Permanent flood barriers are more suitable for this type of development, such as doorsteps / ramps and resilient building materials and the design should physically preclude water from entering the basement.

16.12 Farringdon Road has a much lower level risk of surface water flooding, however finish risk can still be mitigated with finish floor levels being set to at least the same level as the back of the footpath and ensure a fall is provided, falling away from the building line.

16.13 The proposed drainage strategy is to re-use the existing below ground drainage system as much as practically possible. Rainwater will be attenuated at roof/terrace levels in blue roof systems, which contributes to SuDS by:

- Interception of rainwater at source
- Reduce volume run-off due to evaporation
- Reduce peak flows (controlled flow rate)
- Provide amenity (by use of space above, i.e inclusion of terraces)

16.14 With these principles implemented, the Proposed Development is considered to have suitably managed risk of flooding and proved to not increase the probability elsewhere.

16.15 The Proposed Development is therefore considered to be in accordance with relevant national, regional and local planning policies.

### **Inclusive Design and Crime Prevention**

- 16.16 An Access Statement has been prepared by David Bonnett Associates and has been submitted as part of the application. The Proposed Development has been designed to ensure that a good level of inclusive design has been achieved.
- 16.17 The Access Statement considers; people with mobility impairments; people with vision impairments; people with neuro-diverse requirements; deaf people; older people; and small children
- 16.18 Key access provisions include:
- The provision of a new transfer passenger access lift inside the building, to provide internal access for the level change between Farringdon Road and Saffron Hill, as there is no external step-free access.
  - Accessible cycle parking spaces for tenants, staff and visitors
  - Wheelchair-accessible facilities,
  - Step-free access to all parts of the building, including roof terraces
  - Wheelchair manoeuvring spaces
  - Provision of evacuation lifts
- 16.19 The Proposed Development is therefore designed to be as inclusive as possible and has the potential meet access and inclusive design policies set out in the London Plan and as such, is considered acceptable.
- 16.20 The design team have also assessed the Site for issues relating to crime, safety and anti-social behaviour and a Security Needs Assessment has been prepared by Kabsec.

- 16.21 The Proposed Development is in a low crime area within the Metropolitan Police area, however the scheme will provide additional informal surveillance for the surrounding which is likely to reduce anti-social behaviour.
- 16.22 Overall, the Proposed Development is considered to enhance the area and the proposed users integrate successfully into both its immediate and wider surroundings, and will not have an adverse effect on the community, rather it is envisioned that it will enhance the community in which it sits.
- 16.23 In relation to crime prevention and safety, the proposal complies with planning policies and is considered acceptable.

## 17. Planning Obligations and Community Infrastructure Levy

- 17.1 This section of the Planning Statement sets out the proposed Community Infrastructure Levy (CIL) payments and planning obligations.
- 17.2 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 17.3 In accordance with Regulation 122 of the CIL Regulations, and Paragraph 58 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the Proposed Development acceptable in planning terms;
  - b) Directly related to the Proposed Development; and
  - c) Fairly and reasonably related in scale and kind to the Proposed Development.
- 17.4 Paragraph 56 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 17.5 Paragraph 57 of the NPPF sets out that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. The text goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided unless there is clear justification

17.6 In the case of the LBC, a local CIL Charging Schedule was adopted in October 2020.

17.7 The Schedule places the Site in Zone A (Central) and as such, the following charges apply:

- Office: £110 per sqm
- Other commercial uses: £32

17.8 In addition, the Proposed Development will be liable to Mayoral CIL, and the MCIL2 charge of £185 per sqm for office floorspace and £165 per sqm for retail and analogous uses will be applicable.

### **Draft Heads of Terms ('HoTs')**

17.9 The Proposed Development is expected to be subject to a number of Section 106 contributions, which have been discussed in principle with LBC at pre-application stage. The following items are anticipated, but not limited to, with details to be finalised during the consideration of this Application:

- Affordable Jewellery Workspace
- Travel Plan
- Car-free development
- Construction Management Plan, CM implementation support contribution and CM Impact Bond
- Highways
- Pedestrian, Cycling and Environmental Improvements
- Public Open Space
- Employment and Training contribution
- Apprentice support contribution
- Carbon Offset contribution

- Employment & Training Plan
- Construction work experience
- Basement approval contribution



## 18. Summary and Conclusions

- 18.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 18.2 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, require that special regard be had to the desirability of preserving listed buildings, including their setting, and preserving or enhancing the character and appearance of conservation areas.
- 18.3 This Statement has assessed the proposals within the legislative framework, having regard to the development plan and relevant guidance at national, regional and local level.
- 18.4 The Proposed Development would deliver a raft of significant social, economic and environmental benefits including:
- a. Architectural and design quality: these are core NPPF planning principles and can be part of a rounded offer of public benefits. The proposed scheme by DSDHA achieves a more considered design solution than the existing building and is more appropriate in the settings of surrounding heritage assets and the townscape.
  - b. Economic benefits of the scheme for the public occur both during construction and once the building is operational. These include:
    - £850 local spend each year by construction works

- Up to £2.9m additional worker expenditure annually once operational
  - Up to £3.4m in annual business rates
  - £99.5m of Gross Added Value expected to be generated by the Proposed Development per year with an uplift in tax revenues of up to £39.8m per year.
- c. Jobs benefits of the scheme for the public including:
- 280 construction jobs supported for the 27 month construction period;
  - Up to 430 net additional jobs arising from the Proposed Development;
  - Up to 25-45 new jobs expected to be taken up Camden residents;
- d. Training and local employment benefits to be delivered by the scheme including 25 apprenticeships and 10 work placements to be provided.
- e. Jewellery Workspace: the provision of 520 sqm of high quality, truly affordable jewellery workspace within Hatton Garden
- f. The provision of additional greenery across the building which provides benefits to the public with regards to visible softening and greening, improved air quality and habitats;
- g. Substantial increase in the ecological value of the site with the provision of new habitat creation and the provision of species-specific enhancement including bird and bat boxes and an Urban Greening Factor of 0.3;

- h. The provision of car free development which encourages sustainable transport modes, including the provision of new cycle parking and end of journey facilities; and
- i. Significant enhancements to the accessibility of the building.

- 18.5 The Proposed Development would be transformational and demonstrates the design team's commitment to develop the right solution to optimise development and uses on this highly accessible site within the CAZ. The principles established early on, namely of maximising the level of retention, minimising the carbon cost of construction, and in operation, have continued as a thread throughout the design process in order to provide a functional, beautiful and sustainable building.
- 18.6 The proposed building will create a gateway to Hatton Garden and LB Camden; activate the historic route of Saffron Hill, provide locally specific jewellery space; and provide a building befitting the site's prominent location.
- 18.7 As set out through this Statement, we consider that the Proposed Development complies with the relevant statutory tests and development plan policies and should be granted planning permission accordingly.

## APPENDIX A: 19 Charterhouse Street Planning History

# Appendix A: 19 Charterhouse Street Planning History

Application Number	Site Address	Development Description	Status	Date Registered	Decision
2017/5142/P	17 and 19 Charterhouse Street London EC1N 6RA	Facade repair works to 17 Charterhouse Street and 19 Charterhouse Street (Saffron Hill elevations) following removal of four-storey link bridge (1st to 4th floors).	FINAL DECISION	09-11-2017	Granted
2017/5136/P	17 and 19 Charterhouse Street London EC1N 6RA	Demolition of four-storey link bridge (1st to 4th floors) spanning Saffron Hill, linking 17 and 19 Charterhouse Street.	FINAL DECISION	18-10-2017	Prior Approval Required - Approval Given
2012/6561/A	The London College of Accountancy 19 Charterhouse Street London EC1N 6SA	2 x non-illuminated aluminium fascia signs above entrance to front and side elevations.	FINAL DECISION	12-12-2012	Granted
2009/4737/P	19 Charterhouse Street, LONDON, EC1N 6RA	Change of use of existing building from offices (Class B1a) to dual use as non-residential institution use (Class D1) and offices (class B1a).	FINAL DECISION	20-10-2009	Granted Subject to a Section 106 Legal Agreement
2007/4510/C	Bridge linking 17 - 19 Charterhouse Street London EC1N 6RA	Demolition of four storey link bridge.	FINAL DECISION	26-09-2007	Granted
2007/4509/P	Bridge linking 17 - 19 Charterhouse Street London EC1N 6RA	Demolition of four storey link bridge and reinstatement of new windows at 19 Charterhouse Street and curtain walling at 17 Charterhouse Street on the side elevations at first to fourth floor levels.	FINAL DECISION	26-09-2007	Granted
2007/1922/P	19 Charterhouse Street London EC1N 6RA	Erection of safety railings at 5th floor and roof level to existing office building.	FINAL DECISION	11-06-2007	Granted
CA1553	at 19 Charterhouse Street.	to the display of a transom panel with internal static illumination at 19 Charterhouse Street.	FINAL DECISION	23-01-1962	Permission

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