



BY E-MAIL

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Your Ref 2025/1683/P
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23 May 2025

Dear Adam,

19 CHARTERHOUSE STREET, LONDON, EC1N 6RA (THE “PROPERTY”)
PLANNING APPLICATION REFERENCE: 2025/1683/P (THE “PLANNING APPLICATION”)

1. INTRODUCTION AND BACKGROUND

- 1.1 We are writing to you on behalf of our client, Anglo American Services (UK) Ltd, a member of the Anglo American plc group of companies (“**Anglo American**”), in connection with the Planning Application that has recently been submitted to the London Borough of Camden (the “**Council**”) for the proposed redevelopment (the “**Proposed Development**”) of the Property.
- 1.2 Anglo American are the leasehold proprietor of the neighbouring property, 17 Charterhouse Street. This letter has the support of Anglo American’s landlord, M&G.
- 1.3 17 Charterhouse Street is the headquarters of Anglo American and its affiliated De Beers companies (together the “**AA Group**”), who have international significance in the mining and (in the case of the De Beers companies) diamond sectors. The AA Group have historic ties to the Hatton Garden jewellery district with 17 Charterhouse Street being the long term headquarters of De Beers in the heart of the jewellery quarter. The building was comprehensively refurbished, including the addition of proportionate extensions following the grant of planning permission in January 2018.
- 1.4 During the planning process to secure permission for their refurbished headquarters the AA Group engaged collaboratively with the Council and key stakeholders, who strongly supported the principle of them remaining as an integral part of the jewellery quarter, at a time when other relocation options were under consideration. Chief among the AA Group’s decision to remain at 17 Charterhouse Street was the ability to create world class office and workshop space to match the AA Group’s international profile.

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1.5 Whilst the AA Group does not object to the principle of development at 19 Charterhouse Street, it does object to the excessive scale of what is currently proposed by the Planning Application. Having reviewed the Planning Application the AA Group consider that the development proposed would result in multiple harmful impacts which cumulatively amount to unneighbourly and unacceptable development that is not compliant with the Development Plan and which will result in a negative impact on the AA Group's occupation and operations at 17 Charterhouse Street.

1.6 The specifics of the AA Group's objections to the Planning Application are as follows:

2. **LOCATION UNSUITABLE FOR A TALL BUILDING**

2.1 The Planning Application states that the Proposed Development will have a maximum height of 57.75 metres. The Planning Statement says that this height is AOD. Our review of the submitted plans (the proposed elevations) indicates to us that the building proposed by the Planning Application would be 45.325 metres above street level on the east and south elevations and 49 metres above street level on the north and west elevations.

2.2 The Council's Local Plan 2017 ("**2017 Local Plan**") describes tall buildings as: "For this policy tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline".

2.3 The Council's emerging Local Plan¹ says the following in Policy D2:

"The Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift overruns)"

2.4 Our calculations set out in paragraph 2.1 show that on a 'street level to lift overrun level' the building exceeds 40 metres at all elevations and therefore qualifies as a tall building according to the Draft New Local Plan.

2.5 The Draft New Local Plan goes on to say:

"Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12"

2.6 19 Charterhouse Street is not a location that is identified on Figure 22 as potentially suitable for a tall building.

3. **DAYLIGHT AND SUNLIGHT IMPACTS ON ST ANDREW'S HOUSE**

3.1 Daylight and sunlight considerations are referenced in Policy A1 (Managing the Impact of Development) within the 2017 Local Plan. Specific reference is made to the

¹ Camden Local Plan Proposed Submission Draft. Consultation upon which closes on 27 June 2025 ("**Draft New Local Plan**").



importance of assessing the effects of new development on the daylight and sunlight received by existing properties. It states:

“The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.”

- 3.2 Given the height of the Proposed Development and its proximity to neighbouring buildings, the AA Group has serious concerns regarding its potential impact on daylight and sunlight generally and in particular to the nearby St Andrew's House (comprising part of the 17 Charterhouse Street estate). St Andrew's House is a Grade II listed building. AA Group commissioned Anstey Horne (“AH”) to undertake an independent peer review of the applicant's daylight and sunlight assessment.
- 3.3 A Daylight and Sunlight Report (“**DSR**”) was submitted by Point 2 Surveyors in support of the Planning Application. Following a detailed review of this report, AH consider that the Proposed Development would result in unacceptable reductions in daylight to St Andrew's House, a building comprising multiple residential units and located in close proximity to the Property.
- 3.4 AH have reviewed the applicant's DSR and note the following reported compliance rates for St Andrew's House:

VSC Compliance Rate (Windows)	DD/NSL Compliance Rate (Rooms)	APSH Compliance Rate (Rooms)
41/56 (73%)	25/36 (70%)	34/36 (94%)

- 3.5 Taking each of the above in turn:

Vertical Sky Component (VSC)

- 3.6 Of the 15 windows that fall short of the BRE guidelines, 14 are expected to experience significant and highly perceptible reductions in daylight. Losses exceed 40% in several instances, particularly at lower levels. These reductions will meaningfully diminish visible sky and, by extension, the natural light reaching affected rooms.
- 3.1 Point 2 attributes these transgressions to “existing walkways/overhangs above” the affected windows. They also conducted a supplementary analysis assuming the removal of these balconies, concluding that “all windows will remain fully BRE compliant” in such a scenario. While BRE 209 acknowledges the effect of balconies on baseline daylight levels, the removal of balconies in the analysis model is an artificial construct. The actual condition of the building—Grade II listed, and with architectural features that cannot be removed or altered—must form the true basis of assessment.
- 3.2 To discount the daylight impact by removing a permanent architectural feature in a protected heritage building is to fundamentally misrepresent the lived reality of its occupants. BRE 209 itself is clear that such theoretical exercises are *indicative*, not determinative. Moreover, Historic England guidance underscores the need to preserve daylight as a defining characteristic of many historic buildings.
- 3.3 Therefore, any adverse impact recorded with the real geometry in place—especially where it breaches BRE thresholds—must be treated as unacceptable in the planning balance.

Daylight Distribution / No Sky Line (DD/NSL)



- 3.4 A number of rooms would experience substantial reductions in daylight—exceeding 40%. For instance, Room R9 on the third floor is projected to see a decrease in adequately lit area from 96.9 sq ft to 49.5 sq ft, representing a 48.9% reduction. These losses are due to considerable massing that, in many cases, would obstruct nearly all access to natural light.
- 3.5 Moreover, the applicant has not provided contour plots or verified internal layouts, both of which are critical for validating assumptions and assessing the accuracy of their model. Without this supporting information, there is a lack of transparency in how the daylight impacts have been evaluated.

Annual Probable Sunlight Hours (APSH)

- 3.6 In terms of APSH, the applicant notes that 34 of 36 rooms (94%) will meet or exceed the BRE Guideline values for room-based APSH.
- 3.7 Whilst it is accepted that some flexibility of the BRE guidelines may be acceptable in dense urban environments, the applicant has not provided any robust evidence, such as contextual studies or comparable examples, to justify the level of loss proposed. As such, the argument that the surrounding urban grain justifies further deterioration in daylight levels lacks technical and evidential support.

No assessment of impact on photovoltaics

- 3.8 The Point 2 report has also disregarded the impacts of the Proposed Development on the solar panels located on the roof of 17 Charterhouse Street.
- 3.9 Policy D1 of the Council's Draft New Local Plan says that the Council will expect development to (amongst other matters) "avoid having a detrimental impact on existing solar photovoltaic panels, for example, through overshadowing".
- 3.10 The applicant should therefore be required to assess the impact of the Proposed Development on the solar panels at 17 Charterhouse Street.

Daylight and Sunlight Impacts - Conclusions

- 3.11 Since the application for the Proposed Development:
- 3.11.1 would result in a substantial loss of daylight to numerous rooms and windows at St Andrew's House;
 - 3.11.2 contains an absence of complete and transparent technical evidence, including the lack of contour plots and verified internal layouts;
 - 3.11.3 lacks viable mitigation or justification for the impacts proposed; and
 - 3.11.4 fails to assess its impact on the photovoltaic panels located on the roof of 17 Charterhouse Street

the Council should refuse it in its current form.

4. SCALE AND MASSING IMPACTS

- 4.1 Notwithstanding that the Property has not been identified as a location that may be suitable for a tall building, the Planning Application proposes an upward extension of



the current building by five storeys, increasing its height from 40.5m AOD to 58m AOD. While there are examples of other consented developments in the immediate vicinity which propose upward extensions of similar scale, they benefit from a significantly larger footprint than that of 19 Charterhouse Street, which is characterised by its narrow linear plot that runs north to south along Farringdon Road.

- 4.2 The shape of the plot of 19 Charterhouse Street, coupled with a +17.5m upward extension over five storeys, has the potential to create a canyon effect along Farringdon Road. Other schemes, such as that at 40 Holborn Viaduct (ref. 23/00867/FULMAJ, City of London), more successfully balance increased height and massing with appropriate street scene impacts because the deeper plot allows for a more meaningful set-back of the upper storeys.
- 4.3 The sheer nature of the proposed extension will have a particularly unneighbourly and overbearing impact on the building at 17 Charterhouse Street and will diminish the quality of the commercial space located within it. Chief among AA Group's decision to refurbish 17 Charterhouse Street was the ability to deliver a particularly high quality of workspace. It is therefore clear that a significantly reduced upward extension at 19 Charterhouse Street would be appropriate and neighbourly. While it is acknowledged that the Proposed Development only creates a minor breach of the St Paul's Viewing Corridor in the London View Management Framework (LVMF), it is nonetheless an obvious indication that the scale of extension is excessive and amounts to overdevelopment. Put simply, the Planning Application would not result in a breach if the scale of the Proposed Development was reduced.
- 4.4 Notwithstanding the direct impacts on 17 Charterhouse Street, the excessive height of the Proposed Development will create a direct line of sight to the Gamages Estate. This estate was a principal consultee in respect of AA Group's redevelopment of 17 Charterhouse Street and collaborative engagement was undertaken to seek to avoid any impacts on residential neighbour amenity. It is unclear from the Planning Application documentation to what extent the Gamages Estate has been consulted on the Proposed Application. Again, if the Proposed Development were reduced in scale a direct line of sight to the Gamages Estate could be avoided and thus reduce unneighbourly amenity impacts on its residents.

5. HERITAGE IMPACTS

- 5.1 Saffron Hill represents a tight knit historic street of high significance. The existing context allows for height but without overwhelming the street (5-6 storeys dominant height along Farringdon Road with 3-4 behind). The scale of Proposed Development would completely overwhelm and detract from this historic significance and is overbearing in this context.
- 5.2 The additional height and consequential failure to 'step back' would overwhelm and detract from the significance of 25-27 Farringdon Road (Grade II listed) which currently has a harmonious relationship with adjacent development and is a key building within Farringdon. This listed building would become subservient to the Proposed Development with the result that its setting would be harmed.
- 5.3 The Proposed Development is overly dominant and fails to step back sufficiently. It lacks hierarchy in the design of fenestration with taller windows at the top of the building compared to lower levels. This is alien and at odds with historic context where windows become smaller as the built form rises. As a result, the current design of the Proposed



Development gives a 'top heavy' impression, which is out of context with surrounding buildings.

- 5.4 Harm would also be caused to the setting of the Grade I listed St Paul's and Grade II* Old Bailey due to the intrusion of the Proposed Development into the protected view. St Paul's is universally considered to be one of London's most iconic landmarks and so intrusion into the viewing corridor is highly significant. As noted above this harm could be avoided entirely if the scale of the Proposed Development was reduced.

- 5.5 The Council will be aware that any harm to a listed building or its setting should be given "considerable importance and weight" in the planning balance (see *East Northamptonshire District Council v Secretary of State for Communities and Local Government* [2014] EWCA Civ 137).

6. HIGHWAYS IMPACTS

- 6.1 Opportunities to improve the public realm through the refurbishment and updating of the adjacent 19 Charterhouse Street are recognised. Numbers 17 and 19 Charterhouse Street share the use of Saffron Hill which a private street dividing the two buildings. Access to Saffron Hill is controlled by a series of rising bollards, under the management of number 17, but with access rights for number 19. Due to the scale of the Proposed Development, concerns are raised about the intensification of the use of Saffron Hill for servicing and waste collection, and how the two-way narrow road with controlled access can facilitate such movements without obstructing access to number 17 and/or blocking the adopted highway that connects to Saffron Hill

- 6.2 In addition, the scale of the Proposed Development would result in extensive foot and cycleway closures along Farringdon Road during the construction phase which will hinder access to and from number 17 and force many users to utilise the stepped route between Charterhouse Street and Saffron Hill, which is not accessible for all.

- 6.3 Assuming a new or revised scheme which is of an acceptable scale can be agreed by the applicant and the Council, AA Group would welcome the opportunity to meet with the applicant to discuss the same and in particular to discuss transport and access mitigation measures.

7. CONSTRUCTION DISRUPTION

- 7.1 It is acknowledged that a level of construction disruption is an inevitable consequence of any development proposal in the central London area but the scale of the Proposed Development in conjunction with the location in this instance will lead to more intensive and prolonged disruption than would otherwise be the case if the development that was being applied for was of an appropriate scale and massing for the area.

8. AFFORDABLE JEWELLERY SPACE

- 8.1 Policy E2 of the 2017 Local Plan requires proposals in Hatton Garden which increase total gross internal floorspace by more than 200sqm to provide 50% of the additional floorspace as affordable premises suitable for the jewellery sector. The applicant's planning statement says that their offer in this respect is less than 20%² and so it is not clear how the deficit will be made up to ensure policy compliance or otherwise how this

² At paragraph 7.30



departure from policy is justified. In addition, the location of affordable jewellery space on Saffron Hill may lead to adverse transport impacts that would require mitigation.

9. **CONCLUSION**

- 9.1 The AA Group does not object to the principle of redevelopment at 19 Charterhouse Street, and it recognises the benefits of repurposing the existing building at 19 Charterhouse Street to provide a better quality of commercial space which can make a positive contribution to the local townscape at an important gateway site.
- 9.2 However, the Proposed Development in its current form clearly amounts to overdevelopment of the Property, the scale and massing of which will result in numerous adverse impacts on neighbouring properties and which also amount to non-compliance with the Development Plan. The extent of policy non-compliance is such that the Planning Application is in overall non-compliance with the Development Plan and therefore planning permission should be refused.
- 9.3 It may be that the Proposed Development could become acceptable if it is revised – principally this should comprise a significant reduction in scale and massing with appropriate set-backs at the upper levels.
- 9.4 The AA Group would welcome the opportunity to engage further with both the applicant and the Council in relation to the contents of this objection and the Proposed Development generally.
- 9.5 Please note that AA Group and its professional advisors are continuing to study and consider the detail of the Proposed Development and the AA Group reserves its right to make further representations on the Planning Application in due course and in particular, but not limited to, following its receipt of a response to its Environmental Information Regulations 2004 request for copies of the pre-application advice that was given to the applicant.

Yours sincerely,

Pinsent Masons LLP

Pinsent Masons LLP

cc. Mark Mayfield and Helen Snooks – M&G