

**Farringdon Point,
29-35 Farringdon Road, London
Planning and Heritage Statement**

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February 2015

Indigo Planning

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Farringdon Point, 29-35 Farringdon Road, London Planning and Heritage Statement

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**Farringdon Point,
29-35 Farringdon Road, London**
Planning and Heritage Statement

Appendices

Appendix 1

Pre-application advice

Appendix 2

Site Location Plan

1. Introduction

- 1.1. This statement has been prepared by Indigo Planning, on behalf of Threadneedle Pensions Ltd, in support of a planning application for the residential development of the land to the rear of 29-35 Farringdon Road, London EC1M 3JF.
- 1.2. The accompanying application seeks planning permission for:
- “the construction of 4 two bedroom and 1 one bedroom dwellings, and associated works.”*
- 1.3. The proposed development seeks to create five high quality new apartments. The proposed apartments have been designed to sit comfortably within the constraints of the rear infill site.
- 1.4. The proposal is a resubmission of application 2014/3391/P, which was lodged in early 2014 however withdrawn following further discussion with officers. The proposed development has been amended at fifth floor level to ensure it is cut away from residential windows of Farringdon Point. Further evidence has also been submitted justifying that in practical terms no jewellery provision can be accommodated on the site.
- 1.5. The proposal has been informed by pre-application discussions with the Council's planning and design officers on 14 November 2013. The pre-application advice is provided as **Appendix 1** to this report, and also further advice sought in 2014 during the course of the previous application.
- 1.6. This Statement should be read in conjunction with the following reports submitted in support of the application:
- Design and Access Statement, prepared by Ben Adams Architects;
 - Daylight and Sunlight Report, prepared by Malcolm Hollis;
 - Energy Statement, prepared by FHP;
 - Transport Statement, prepared by Vectos;
 - Archaeological Desktop Assessment, prepared by Archaeological Solutions;
 - Noise Assessment; prepared by Hann Tucker; and
 - Assessment of Jewellery Space Provision, prepared by Indigo Planning.

Scope of statement

- 1.7. This statement addresses the key planning issues arising from the proposed development, having regard to planning policy and advice at national, regional and local levels.
- 1.8. The remainder of this statement is structured as follows:
- **Section 2** describes the site and its surroundings;
 - **Section 3** describes the proposed development;
 - **Section 4** describes the relevant planning history;

- **Section 5** addresses the key planning considerations relating to the scheme;
- **Section 6** outlines the proposed heads of terms in relation to any Section 106 agreement and likely Community Infrastructure Levy; and
- **Section 7** concludes the statement, setting out the overall planning benefits of the proposal.

2. Site and Surrounds

- 2.1. The application site is located on the corner of Farringdon Road and Greville Street, and is known as Farringdon Point. The planning application relates to the rear area of the site which fronts Saffron Hill. The Site Location Plan provided as **Appendix 2** to this report identifies the application site in red.
- 2.2. The site is located within the Hatton Garden Conservation Area, and sits within the Strategic Viewing Corridor from Kenwood and Parliament Hill toward St Paul's Cathedral as well as the background viewing area from Black Heath to St Paul's Cathedral. The site also sits within an Archaeological Priority Area.
- 2.3. The wider Hatton Garden area provides a range of retail, commercial, office and residential uses.
- 2.4. The immediate area is characterised by buildings of varying heights built up to the street boundary. The scale of development, minimal separation between buildings and narrow road of Saffron Hill results in a more compact streetscape. The surrounding uses include a mix of retail, office and residential uses.
- 2.5. The application site area is rectangular in shape. The site abuts both side boundaries, with a brick wall and steel gate built to the Saffron Hill front boundary. The site is essentially flat and is currently vacant, being the access into the service yard.
- 2.6. The site was developed in the 1950's/60's with a seven storey building with basement. The building is of modular style within a concrete frame. The upper floors are set back with a tower as the corner feature. The building is not locally listed and is not a designated heritage asset, but rather the Hatton Garden Conservation Area in which it is located.
- 2.7. The wider site accommodates a variety of uses. The basement is used as a bar/nightclub, with floors one to five used as offices and floors six to seven residential dwellings. A car park and loading bay sits to the rear of the building, accessed directly from Saffron Hill via a dual width crossover.
- 2.8. The application site is located within close proximity to Farringdon Tube and Overland Stations and several bus links. The site has a Public Transport Accessibility Level (PTAL) rating of 6b, and is highly accessible.
- 2.9. The site is in Flood Zone 1, the lowest level of flood risk.

3. Proposed Development

- 3.1. The proposed development comprises the infilling over the entrance to the rear service yard, which fronts onto Saffron Hill, to provide 4 x 2-bedroom and 1 x 1-bedroom residential units.
- 3.2. The units are arranged one unit per floor, with the top level being cut back to the rear to accommodate a one bed flat. The building has been designed to sit within its immediate context. The height of the proposed building would assist to tie in the different in building heights of neighbouring buildings on each side.
- 3.3. The ground floor has been designed to be functional whilst providing an element of interest through perforated metal panels, which will hide the bike store, bin store and service yard from the street. The entrance to the building will be light with glazed doors leading to a glazed stair well which will sit on the northern elevation of the building, and provide a visual break between the proposed building and its neighbour.
- 3.4. Internally each floor will be occupied by one flat which will be accessed via either the stairwell or lift. The living room / kitchen would occupy the majority of the floor space with the two bedrooms fronting Saffron Hill. The living room would open onto an external glazed balcony which overlooks Saffron Hill. The rear elevation has been carefully designed to ensure there is no overlooking while sufficient light is received into the flats through the use of clear storey windows.
- 3.5. Externally, the building reflects the architectural language of the area, with the majority of buildings being brick pier with punched window openings. The proposed building takes a similar design approach.
- 3.6. The roof will be flat which matches the other roofs along Saffron Hill.
- 3.7. No car parking is proposed for the flats, as the site benefits from a high PTAL rating and is within close proximity to public transport. Secure, covered cycle parking is provided for each flat.

4. Planning history

- 4.1. Planning permission was granted in 1959 for the erection of a five storey building comprising basement, ground and four upper floors, for use as a warehouse (ref TP12527/25257). Subsequent planning applications provided permission to convert the warehouse use to office space.
- 4.2. In 2005 planning permission was granted for two additional floors to the existing building to accommodate 13 new flats together with roof level plant enclosure (ref 2005/1164/P).
- 4.3. Of particular relevance to the principle of residential floorspace, when considering 2005/1164/P the Council found residential use to be acceptable as this was a priority for the area, and the proposal would not result in the loss of any B1 floorspace.
- 4.4. In terms of adding two additional floors to the existing building, the officer's report states that:

“the Hatton Garden Conservation Area Statement does not identify the building as contributing positively or negatively to the conservation area. It is considered that the building makes a neutral or possibly negative contribution and the development therefore presents an opportunity for townscape improvement.”
- 4.5. The officer's report noted that the resultant height of Farringdon Point with the two additional floors of residential would remain below the height threshold set for the strategic viewing corridors of St. Paul's Cathedral, and was considered acceptable.
- 4.6. In terms of privacy, with the nearest habitable rooms being approximately 14m and 16m away and at oblique views was considered to be sufficient to prevent an undue degree of enclosure or visual intrusion. As such, it was considered acceptable.
- 4.7. A noise report was submitted with the application which concluded that the proposed plant could be operated within the noise criteria of 10 dB below background noise levels. With the provision of noise attenuation, in the form of an acoustic enclosure it was considered that there would be no material loss of amenity to surrounding residential properties as a result of noise nuisance.
- 4.8. As the site is within a CPZ and there was evidence of parking stress, an s.106 was requested and provided requiring a car-free development.
- 4.9. It was concluded that a residential use would contribute to the strategic requirement for residential use in the area and the Borough generally and would not compromise the special jewellery use character of the area. With conditions relating to design and s.106 contributions towards education, and restrictions on parking, the development was considered to enhance the character and appearance of the conservation area and as such, was approved.
- 4.10. Planning application 2014/3391/P was submitted in June 2014 for the construction of 4 two bedroom and 1 three bedroom dwellings, and associated works. The application has since been withdrawn. The current application is essentially a resubmission of the 2014/3391/P proposal, with the only substantial difference relating to additional evidence being submitted to justify no jewellery space being provided, and a cut back at top floor level to ensure the amenity of the existing bedroom is retained.

5. Key Planning Considerations

Development Plan and Decision Making

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning decisions to be made in accordance with a Development Plan unless material considerations indicate otherwise. The London Borough of Camden Development Plan comprises the following relevant documents:
- Core Strategy (2010);
 - Development Policies (2010);
 - Site Allocations (2013); and
 - The London Plan (2011).
- 5.2. The National Planning Policy Framework (NPPF) was published in March 2012. It is a material consideration in the determination of planning applications.

Positive Planning

- 5.3. The NPPF contains, at paragraph 14, a presumption in favour of sustainable development which requires local planning authorities to meet development needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 5.4. It seeks, at paragraphs 186 and 187, a positive approach to planning applications that fosters the delivery of sustainable development, seeking solutions rather than problems, while proactively securing development that improves the economic, social and environmental conditions of an area.

Principles of residential development

- 5.5. The NPPF seeks, at paragraph 47, to significantly boost the supply of housing, and requires local planning authorities to objectively assess the need for housing. Paragraph 49 states that the presumption in favour of sustainable development should be applied to housing applications.
- 5.6. The London Plan outlines a ten year target of 6,650 homes to be built within LB Camden, with an annual target of 665. The subject site is located in the Farringdon/Smithfield area which is identified as being an Area for Intensification.
- 5.7. London Plan Policy 3.8 'Housing Choice' seeks genuine choice of homes and a mixture of types and sizes of dwellings to be delivered. In addition, Policy 3.4 (Optimising Housing Potential) states that, while taking account of local character and context including transport capacity, development should optimise housing.
- 5.8. Housing is the priority land-use of the Camden Local Development Framework. The adopted Core Strategy confirms that the Council will make full use of Camden's capacity for housing by maximising the supply of additional housing to meet or exceed Camden's target.
- 5.9. Core Strategy policy CS1 'Distribution of growth' requires the development to make full use of the site, whilst taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site, as described below.
- 5.10. Development Policy DP2 'Making full use of Camden's capacity for housing' seeks to maximise the supply of additional homes in the borough, including through the development

of underutilised and vacant sites.

- 5.11. The proposed development provides an opportunity to deliver new residential dwellings within the Farringdon / Smithfield area on an underutilised site that is not readily suited to accommodate non-residential uses. The residential development addresses both Council and the Mayors housing strategies and priorities, and represents the most practical use of the land.

Provision of space for the Jewellery Industry

- 5.12. Development Policy DP1 states that where more than 200m² additional floorspace is provided on sites within the Hatton Garden Area, up to 50% of all additional floorspace should be provided in the form of secondary uses of affordable premises suitable for the jewellery industry.
- 5.13. Within the 2014 planning application submission it was concluded that given the location of the proposed development behind an existing building; the narrow frontage to Saffron Hill; the limited site area, and the need to retain access to existing uses via the ground floor; the constraints of the site make it unsuitable for non-residential use, including a jewellery store or associated jewellery manufacturing space.
- 5.14. The jewellery industry benefits from a clustering of units which can share services. Of particular note is security and privacy which is important to the industry. Occupiers particularly seek additional security and areas where they can share a café and meeting rooms and office facilitates with other jewellers. The provision of a unit within a residential building which shares the same communal areas as residential would represent a security risk.
- 5.15. Where it was not possible to provide a sufficient quantum of workshop space, or have a separate entrance and core, then a financial contribution has been accepted by the Council in other instances for the reasons given above. In terms of site specific reasons for 29 – 35 Farringdon Road we conclude that it is:

- Not practical to provide floorspace at basement level for any use due to the electricity sub station;
- Not practical to provide floorspace at ground floor level due to site constraints;

- 5.16. Not practical to provide jewellery space on upper levels due to:

- The building having a single core;
- Inability incorporate different uses;
- Need to retain servicing requirements for the existing and lack of space for the servicing of the proposed units;
- Lack of security with the only option to share one entrance with other uses;
- Lack of privacy due to other occupiers sharing circulation space; and
- Lack of space to provide office/café/meeting rooms which occupiers require.

Dwelling mix and layout

- 5.17. While Council policy does not provide a prescriptive basis for determining the mix of unit size on site, market housing dwelling sizes are prioritised based upon their immediate need within the community. Development Policy DP5 'Homes of different sizes' identifies the delivery of two bedroom units as the Councils highest priority.
- 5.18. Council's pre application advice reaffirmed the priority to deliver two bedroom dwellings within the area, however noted a preference that the development include a three bedroom dwelling to increase the dwelling mix.
- 5.19. The proposed development provides 4 x 83.61sqm two bedroom units and 1 x 75.42sqm

one bedroom unit. The proposed dwelling mix is seen as appropriate as it responds to both Councils identified housing priorities, market demand and pre-application advice.

- 5.20. The internal dwelling areas are provided in excess of the London Plan minimum standards, as follows:

Dwelling Type	London Plan minimum standard (sqm)	Proposed dwelling size (sqm)
2 bed/ 3 person	61	83.61
1 bed/ 2 person	50	75.42

- 5.21. All units will be built to Lifetime Home Standards and will also be wheelchair accessible via a lift to all floors, as required by Camden Development Policy DP6 'Lifetime homes and wheelchair housing'.

Affordable Housing

- 5.22. Development Policy DP3 'Contributions to the supply of affordable housing', states that all residential developments with a capacity for 10 or more additional dwellings will make a contribution to the supply of affordable housing. Paragraph 3.8 suggests Council consider that floorspace of 1,000m² (gross) is capable of accommodating 10 family dwellings.
- 5.23. The proposed scheme proposes five residential units, comprising a total internal floorspace well below 1,000m². As noted above, the size of individual units accords with the London Plan minimum standards, and the dwelling mix prioritised by the Council.
- 5.24. The proposal falls under the threshold triggering affordable housing requirements. No affordable housing is proposed to be provided, in accordance with policy.

Design and Heritage

- 5.25. Core Strategy Policy CS14 'Promoting high quality places and conserving our heritage' seeks to ensure developments provide a high design standard that contributes to the creation and retention of attractive, safe, healthy and easy to use places respecting local context and character.
- 5.26. Development Policy DP24 'Securing high quality design' reiterates the design objectives of Policy CS14, indicating the development design response should consider, among other elements, the appropriate character, scale, materials, visual interest, amenity and accessibility of the surrounding site context.
- 5.27. Development Policy DP25 'Conserving Camden's heritage' references the need to preserve the conservation areas, listed buildings, archaeological sites and other natural and historical heritage assets located throughout the borough.
- 5.28. The design, height and mass of the building has been informed by the surrounding context, character and appearance of the immediate area, including heritage values, and the pre-application discussions with the Council planning and design officers.
- 5.29. The application site is located on the Proposals Map as being within the Hatton Garden Area, and specifically the Hatton Garden Conservation Area. As such, any new building should preserve or enhance the heritage character or appearance of the area without seeking to directly mimic or recreate existing examples.
- 5.30. While there is no requirement in any published guidance that buildings in conservation area should be designed to any particular style, the NPPF suggests proposals should contribute positively to making places better for people. It notes at paragraph 58 that planning decisions should aim to ensure that development inter alia 'responds to local history and

character, and reflects the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation’.

- 5.31. In preparing the design response, regard has been given to the existing on site development, the surrounding built form and the following off-site (designated and non-designated) heritage assets that contribute to the character of the immediate area, including:
- 25-27 Farringdon Road (a Grade II listed building);
 - The One Tun, 125 Saffron Hill (a locally listed building); and
 - 116-117 Saffron Hill (a locally listed building).
- 5.32. The delegated officer’s report prepared for the residential extension of Farringdon Point (2005/1164/P) considered the existing built form as making either a neutral or possibly negative contribution to the character of the conservation area. The existing service yard to the rear of Farringdon Point, together with the blank gable elevations of 29-31 Saffron Hill, detracts from the appearance of the immediate area and does little to contribute to the design or heritage qualities of Saffron Hill.
- 5.33. The proposed building will be six levels at its highest point. The uppermost level presents a reduced footprint to minimise its impact on neighbouring buildings, the building would provide a graduation in height from the abutting four storey development at 29-31 Saffron Hill and the rear of the existing seven storey building at Farringdon Point. The elevation drawings and CGI accompanying the application submission demonstrate the proposed scale and massing are appropriate, and that the building will be able to integrate into the current streetscape conditions.
- 5.34. The proposed height of the development, being below the surrounding buildings, ensures it would not impact views from Kenwood and Parliament Hill toward St Paul’s Cathedral or the background viewing area from Black Heath to St Paul’s Cathedral.
- 5.35. The proposed development has sought to incorporate a contemporary architectural design. The subtlety of design reflects the infill nature of the development and the immediate context of Saffron Hill.
- 5.36. The proposals simplicity ensures the rhythm and spacing of the streetscape is continued, and the development is not imposing or competing with the more prominent Heritage elements of the conservation area. The Council’s pre-application advice confirmed this was an appropriate approach, supporting that the developments ‘simple and rational’ design and scale appropriately referenced the Heritage setting and existing development along Saffron Hill.
- 5.37. Whilst there are a variety of building materials within the immediate vicinity, it is proposed to reference the brickwork found in many of the surrounding developments as the primary building façade. The use of brick will introduce detailing to the façade, which is further complimented by the introduction of balconies to provide visual interest and a sense of articulation and depth to the building. The large glazed windows will provide light into the rooms but also serve to break up the frontage of the building.
- 5.38. The proposed scheme will introduce a frontage to Saffron Hill that shields the existing service yard from public view. The simple facade of the front gate and boundary treatment will enhance Saffron Hill by continuing the rhythm of the streetscape and eliminating a previously detracting void. The stairwell provides large glass panels that create a column effect clearly identifying the entrance to the residential units.
- 5.39. The proposals adopt a design approach that will help deliver improvements to the character and appearance of the site and its contribution to the Hatton Garden Conservation Area, whilst also respecting and enhancing the setting of 25-27 Farringdon Road, and 125, 116 and 117 Saffron Hill. In doing this the proposal satisfies the objectives of Core Strategy Policy 14 ‘Promoting high quality places and conserving our heritage’, and Development

Policies DP24 'Securing high quality design' and DP25 'Conserving Camden's heritage'.

- 5.40. An Archaeological Desktop Assessment prepared by Archaeological Solutions accompanies the planning application. In summary, the report found the site had the potential to contain archaeological remnants, however noted both the site and the wider Farringdon Point have been subject to extensive previous ground disturbance, including being bombed in World War II, which will have negatively affected any underlying archaeological deposits that may be present.

Sustainability

- 5.41. Where possible, the proposal incorporates renewable energy technologies and design to reduce carbon emissions and contribute to tackling climate change over the lifetime of the development.
- 5.42. The proposed housing will be built to meet Level 4 of the Code for Sustainable Homes as per Core Strategy Policy CS13 'Tackling climate change through promoting higher environmental standards' and Development Policy DP22 'Promoting sustainable design and construction'.
- 5.43. The Energy Statement prepared by FHB Engineering Services Solutions accompanying this submission further outlines sustainability measures incorporated into the development. It is proposed to use solar photovoltaic panels located at roof level, which will provide for a 20% reduction in CO₂ emissions and 40.2% carbon reduction.

Residential amenity and impact on neighbours

- 5.44. Development Policy DP26 'Managing the impact of development on occupiers and neighbours' seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Of relevance to the application, the Council will consider the amenity relating to visual privacy and overlooking; overshadowing and outlook; sunlight, daylight and artificial light levels; noise and vibration levels; and odour, fumes and dust generation.
- 5.45. The proposed development will have no unreasonable impact on the amenity of any neighbouring property.
- 5.46. The proposed dwellings are oriented to Saffron Hill, and the rear elevation designed in such a way as to ensure there are no overlooking opportunities to any other property. The existing residential dwellings to the rear of the proposal at Farringdon Point and 37 Farringdon Road will not be able to overlook into any of habitable rooms or private open space of the proposed dwellings.
- 5.47. A Daylight and Sunlight report prepared by Malcolm Hollis accompanies this submission. The report finds the building design maximises the daylight and sunlight to the proposed units, does not unreasonably overshadow any neighbouring property and the development is in accordance with the BRE guideline criteria and Camden planning policy.
- 5.48. The proposed development will not generate noise issues. The Noise Assessment prepared by Hann Tucker accompanying this report demonstrates that the proposed dwellings will not be affected by the noise generated by the neighbouring uses, or the servicing of those units.

Transport and Accessibility

- 5.49. The site is widely serviced by train, tube and bus services, recording a PTAL rating of 6b, the highest level of accessibility. The site already benefits from established walking, cycling and public transport links as sought by Development Policy DP16 'transport implications of development'.

- 5.50. The existing vehicle access from Saffron Hill will be retained to allow the continued servicing of the existing Farringdon Point building and nightclub use. The two existing parking spaces will be retained and re-provided within the service yard area.
- 5.51. No parking is proposed for residents as part of the planning application. This is consistent with Development Policy DP18 'Parking standards and limiting the availability of car parking' which seeks development easily accessible by public transport to be car free. We support securing the development as car free through a s.106 agreement, an approach supported by planning officers when approving the additional two storeys of residential accommodation at Farringdon Point (2005/1164/P).
- 5.52. A Transport Statement and a Service Yard Plan have each been prepared by Vectos and accompany this submission. The reports demonstrate the proposal will operate in a safe and efficient manner and have a negligible impact to the existing transport networks.

Bicycle parking

- 5.53. Appendix 2 of the Development Policies Document outlines the amount of bicycles to be accommodated for Use Class C3 residential development. A development is required to provide one bicycle parking space per unit for residents, and one space for visitors for every 10 units for development proposing 20 or more dwellings.
- 5.54. Covered bicycle parking is proposed at ground floor level, with a single, secure and convenient parking space for each resident. No visitor parking spaces are provided.
- 5.55. The proposed bicycle parking is generally in accordance with Section 9 'Cycling facilities' of Camden Supplementary Planning Guidance 7 and is consistent with the objectives of Development Policy DP18 'Parking standards and limiting the availability of car parking'.

6. Planning obligations

- 6.1. In March 2014 the Government published a consultation on “Planning Performance and Planning Contributions”. This summarised the comments received and the Government’s response to the planning contributions part of the consultation.
- 6.2. The Government has reformed the planning system to enable a more transparent and locally driven process; through which new homes and economic growth can be delivered. Important reforms, delivered through the Localism Act 2011 and the Growth and Infrastructure Act 2013, have simplified and speeded-up planning procedures.
- 6.3. The above consultation took forward the Government’s 2013 Autumn Statement commitment to consult on a proposed new 10-unit threshold for section 106 affordable housing contributions within national policy to reduce planning costs to developers. The Government considers that such charges can place a disproportionate burden on small scale developers, including those wishing to build their own homes, and prevent the delivery of much needed, small scale housing sites.
- 6.4. DCLG considered the responses and made changes to national policy with regard to section 106 planning obligations. DCLG guidance has been amended to read:

“Due to the disproportionate burden of developer contributions on small scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1000 square metres, affordable housing and tariff style contributions should not be sought. This will also apply to all residential annexes and extensions.”

Community Infrastructure Levy

- 6.5. The Mayoral CIL came into effect on 1 April 2012. The CIL charging schedule for Camden requires a contribution of £50 per square metres for all new internal floorspace.
- 6.6. Camden Council have yet to approve a local CIL Charging Schedule. The Council submitted a draft CIL charging schedule to the Planning Inspectorate on 28 August 2014. An Examination in Public was held in November. Council’s projected timeframe suggests the CIL will not be adopted and implemented in March 2015.

S106 obligations

- 6.7. Council’s pre-application advice suggested the development would likely be liable to provide financial contributions via a S106 agreement to support the jewellery industry, open space provision and education.
- 6.8. Section 122 of the *Community Infrastructure Levy Regulations 2010* sets out three tests which planning obligations need to meet. Obligations should only be sought where they meet all of the following legislative tests, in that they are:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 6.9. If an obligation does not meet all of the three tests it cannot in law be taken into account in granting planning permission.
- 6.10. Given the introduction of CIL it is proposed that the CIL contribution would address any

payments that the Council would normally seek to charge.

7. Conclusion

- 7.1. The London Plan and the Council's Local Development Framework identify delivering sustainable housing as a key priority within the Borough, citing the need to provide some 6,500 dwellings in the coming years to meet demand.
- 7.2. The proposed infill development delivers five high quality units on an underutilised parcel of land within an established area. The proposed mix of dwellings reflects Councils priority for two and one bedroom market housing, with each unit providing internal floorspace provided in excess of the minimum standards and being accessible to people with limited mobility. The development helps achieve both the Councils and the Mayors housing objectives, while meeting the diverse needs of the Camden community.
- 7.3. The application has been informed by and has responded to the on-going pre-application advice provided by Council's planning and design officers.
- 7.4. The moderate scale of development and contemporary design reflects the immediate character of Saffron Hill and the wider context of the Hatton Garden Conservation Area. The development continues the rhythm of the streetscape and is demonstrated to have no material impact to the amenity of existing residential or commercial developments. The proposal has addressed the constraints of the site and would integrate into Saffron Hill setting.

Date: 9 January 2014
Our Ref: 2013/6807/PRE
Contact: Rachel Miller
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**Development Management
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Sent via email to david.graham@indigoplanning.com

Tel 020 7974 4444
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Dear Mr Graham,

Re. Pre-planning application advice
Address: Land at rear of 29-35 Farringdon Road

I refer to your pre-application enquiry received on 25th October 2013 relating to the above site and our initial pre-application meeting held on 14th November 2013. With your proposals you have submitted a cover letter dated 22nd October 2013, a site plan, photographs, a Design Statement by Ben Adams Architects dated 9th October 2013 and Farringdon Point – Stage 1 Report dated October 2013.

Those in attendance at meeting on 14th November 2013

LB Camden officers:
Rachel Miller (Planning Officer)
Charles Rose (Design and Conservation Officer)

On behalf of the applicant:
David Graham (Indigo Planning)
Paul Heyworth (project manager from Malcolm Hollis)
Michael Wilson Katsibas (architect from Ben Adams Architects).

This letter represents the Council's initial view of your proposals based on the information provided or otherwise available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Overview of the site and relevant planning history

The site comprises the rear service yard and car park of the seven storey building called Farringdon Point. The site is accessed from Saffron Hill via automatic gates.

The building is located within the Central London Area and within the Hatton Garden Special Policy Area and is located within the Hatton Garden Conservation Area. The site is also within the Strategic Viewing Corridor from Kenwood and Parliament Hill toward St Paul's Cathedral as well as the background viewing area from Black Heath to St Paul's Cathedral.

Planning permission was granted in 1959 for the erection of a building comprising basement, ground and four upper floors for use as a warehouse on land at Nos. 29-35 Farringdon Road, Greville Street and Saffron Hill (ref TP12527/25257).

Permission was more recently granted on 05/08/2005, subject to a S106, for the erection of two new floors with an additional smaller level on the corner to accommodate 13x new residential flats, incorporating a new stair tower and ground floor plant enclosure on the Saffron Hill frontage, and a roof level plant enclosure (ref 2005/1164/P).

Relevant Planning Policies

London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8th November 2010, the London Plan 2011 and the NPPF adopted on 27th March 2012.

The Council's following Supplementary Planning Documents (adopted 2011/2013) are also relevant to the proposals:

Camden Planning Guidance 1 – Design
Camden Planning Guidance 2 – Housing
Camden Planning Guidance 3 – Sustainability
Camden Planning Guidance 5 – Town Centres, Retail and Employment
Camden Planning Guidance 6 - Amenity
Camden Planning Guidance 7 – Transport
Camden Planning Guidance 8 – Planning Obligations

Comments on the proposals

Pre-application discussions are sought with a view to redeveloping the rear of the site to provide a five storey building to provide 7 x 2-bed residential units.

Principle of development

The principle of redeveloping this site is considered appropriate. The introduction of residential uses would be welcome and in accordance with policy DP2 that seeks to make use of Camden's capacity for housing.

Where appropriate we seek mixed use developments. Policy DP1 states that where more than 200sqm (gross) additional floorspace is provided, we will require up to 50% of all additional floorspace in the form of secondary uses. As this site is located within the designated Hatton Garden area, a contribution to affordable premises suitable for the jewellery industry would be required. The area is characterised by commercial uses at ground floor level and we consider that the site would be well suited for a premises for jewellery industry at ground or the lower floor levels. Where a scheme does not provide a mixed use on site, justification is required, and an alternate form of contribution towards jewellery industry premises will be required.

In respect of the mix of residential units, please refer to policy DP5 and in particular the dwelling size priority table. Whilst 2-bed units are considered a high priority within DP5, we would seek to have a mix of different residential sizes including one or more 3-bed units (these subject of greater need especially within the Central London Area). The need for a wider mix would be more pronounced if a scheme providing 7 units came forward, less so if a smaller scheme with fewer units or mixed use was proposed.

Design

The Council acknowledges that the ground floor would have a functional requirement for access and storage and as such we recommend that in the event of a single residential use building coming forward, the staircase and entrance to the residential units are as open and enlivened as possible.

The broad design and use of materials satisfactorily responds to the immediate character and appearance of the area. The proposed contemporary design is simple and rational, relying on the fenestration and material details to provide visual interest and depth to the elevations. The success of the development is considered to depend on the appropriate use of high quality materials, detailed design and finished appearance. This includes providing information in the form of typical section details as part of the application to give the Council confidence that the scheme will be of the highest quality once built.

The main issue to consider is the height, with particular regard to the predominant scale of Saffron Hill to which the site relates. At present the proposed scale matches the height of the adjoining building which houses the setback upper floors of the parent building which fronted Farringdon road and Greville Street. In this regard the height is referencing a scale consistent with the large scale sites and primary streets and not the more secondary street along Saffron Hill.

Whilst we acknowledge that the site is at the junction with Greville Street and is part of the main building, it is located and accessed on Saffron Hill. There is a desire to preserve the established street layout and townscape characteristics on Saffron Hill through preventing excessive height to preserve a more subordinate character and appearance.

In this regard you are advised to carry out a townscape study of the area to convince the Council that the scale proposed is appropriate in this location having regard for other similar sites along Saffron Hill.

Residential amenity

Policy DP26 seeks to manage the impact of development on occupiers and neighbours and lists a number of factors that the Council will consider at the planning stage, which are visual privacy and overlooking, overshadowing and outlook, sunlight and daylight. We have serious concerns about the amenity impact in terms of light and outlook for the rear windows of residential properties at 37 Farringdon Road. Any planning submission would need to submit a full daylight and sunlight report in accordance with CPG6.

Any new residential units need to comply with the Council's minimum overall floor area requirements and the London Plan. You are advised that the current proposals that would provide 75sqm for each 2-bed unit would meet the minimum room sizes as specified in Camden Planning Guidance and within the London Plan. However as mentioned above, the housing mix is liable to need to be revised.

The Council would expect the residential units to meet lifetime home standards and a lifetime homes statement would need to accompany any application submission. You are advised to consult chapter 5 of CPG2: Housing.

Transport, servicing and waste

Policies CS11 and DP17 seek to encourage sustainable modes of transport in Camden and DP18 addresses the supply of car parking in the borough to reduce congestion and promote the use of more sustainable modes. The application site benefits from a high connectivity to public transport with a PTAL rating of 6b. The development would be expected to be car free and secured by S106 legal agreement, which restricts the rights of residents to apply for parking permits.

As this site has restricted access, we would require you to submit a Construction Management Plan that would be secured by a S106 agreement. A servicing plan

would be also required with any application submission that details how the development would be serviced.

You are also advised to consult our guidance CPG7 (Transport) with regards to the provision of cycle parking spaces which should also comply with London Plan requirements.

You are referred to seek guidance from CPG1 (Design) with regards to waste and recycling storage.

Sustainability

As the proposal is for new build housing it would be required to meet code Level 4 of the Code for Sustainable Homes. You would need to ensure that the flats would be constructed to high standards of energy efficiency to meet Code Level 4. Please refer to policies CS13 and DP22 for further information.

Community Infrastructure Levy and S106 requirements

You are advised that the proposals will be liable for the Mayor of London's CIL as new residential units are being created and there would be a net increase in floorspace of over 100m². The Council also intends to adopt a CIL before October 2014 to which this proposed development would again be liable.

The guidance in CPG6 requires the provision of 9sqm of *open space* per person for residential developments providing 5 or more additional dwellings. The Council initially expects for open space provision to be on site. Where a site cannot provide on site the preferred option would be to provide suitable open space off-site, but at a maximum of 400m from the development. Having considered the existing constraints of the site it is clear that open spaces can not be provided on site therefore off-site provision would be required.

All residential developments involving a net increase of 5 or more units will normally be expected to provide a contribution towards education provision in the Borough. The contribution sought is proportionate to the size of dwellings proposed, and is not sought for single-bed units, as these are unlikely to house children. The contribution for this development would be secured through a Section 106 Agreement.

Planning submission

If you decide to submit an application then please ensure that you submit all the required information in accordance with the validation checklist. More details can be obtained from our website by logging on <http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements-/>.

You are also advised that the Council would welcome and encourage further meetings to discuss this pre-application submission in respect of all material considerations in an application of this nature. Please see <http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/pre-planning-application-advice/> regarding fees for such meetings.

I hope that you find this pre-application advice useful. I would like to reiterate that this document represents the Council's initial view of your proposals based on the information available to us at this stage and it should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice

formal determination of any planning application we receive from you on this proposal. I must also highlight that our ability to offer advice is ultimately dependant upon the information provided in regard to the existing site and the detail of what is proposed.

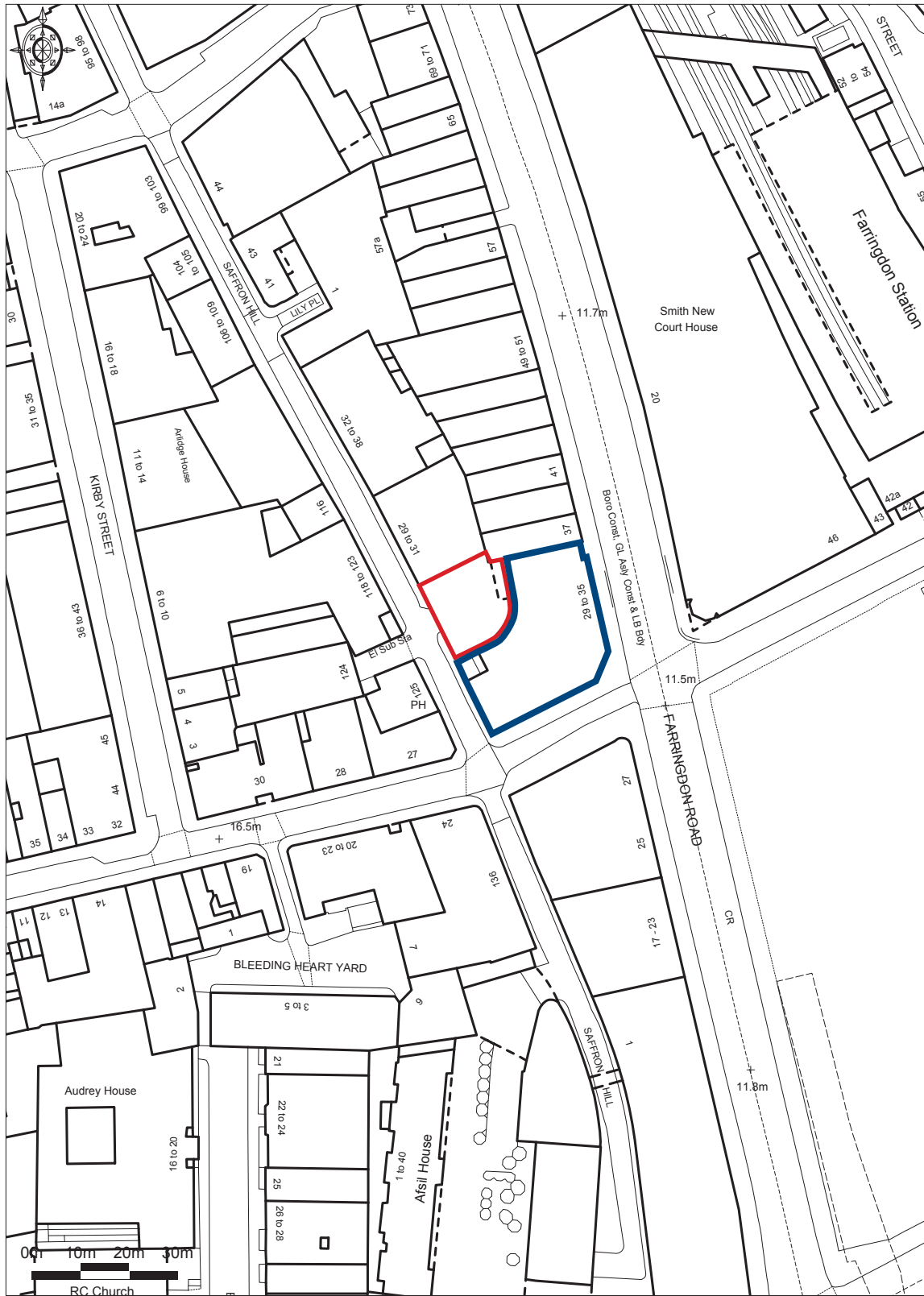
If you have any queries about the above letter or the attached document please do not hesitate to contact **Rachel Miller** on **020 7974 1343**.



Thank you for using Camden's pre-application advice service.

Yours sincerely

Rachel Miller

Planning Officer (East Team)



Project	29-35 Farrington Road	LPA	LB Camden	Indigo Planning Limited Swan Court Worple Road London SW19 4JS	 T 020 8605 9400 F 020 8605 9401 info@indigoplanning.com
Title	Site location plan	Date:	14.10.13		
Client	Threadneedle Property Investment	Scale:	1:1250@A4		
		Project No:	00030163		
		Drawing No:	00030163.1		
		Drawn By:	TH		

Key	— Site boundary
	— Ownership boundary

indigo