



## Design and Access & Planning Statement

69-71 Farringdon Road, London, EC1M 3JB

*Conversion of a ground floor shop unit into two self-contained shop units and change of use of 1<sup>st</sup> floor retail unit (use class A1) into two self-contained flats (use class C3) with associated internal alterations to the basement, removal of a high atrium at rear elevation and replacement with ground floor roof with roof lights.*

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## Introduction

The following Design, Access and Planning Statement has been prepared by 4D Planning on behalf of Mr. Dean Carpenter of 69-71 Farringdon Road, London, EC1M 3JB in support of full planning application seeking planning permission for conversion of a redundant ground floor shop unit into two self-contained shop units and change of use of 1<sup>st</sup> floor retail unit into two self-contained flats with associated internal alterations to the basement, removal of a high atrium at rear elevation and replacement with ground floor roof with roof lights.

The document provides supporting planning, access and design analysis to accompany the planning application, which seeks to better utilise the existing internal space of the unit through conversion and minor internal alterations and deliver much needed residential housing in a borough with limited land capacity.

The application is supported by a number of documents in line with the London Borough of Camden Council's local validation checklist (February 2014), namely:

- Planning Application Forms, Drawings, including existing and proposed floor plans, elevations, sections and detail, as well as a Cover Explanatory Letter by 4D Planning;
- Planning Application Fee by 4D Planning;
- Design, Access & Planning Statement (including photographs) by 4D Planning;

- Statement explaining how the proposal addresses the 16 Lifetime Homes Standards; and
- Certificate of Ownership incorporating Agricultural Land Declarations.

This document assesses the proposal against all relevant policies and other material considerations, which are relevant to the determination of this planning application.

The content of this application is divided into the following six sections:

- Section 1: Introduction
- Section 2: Description of the site and its location, as well as its key characteristics
- Section 3: Assessment of the relevant planning history of the site
- Section 4: Description of the proposed development
- Section 5: Planning Considerations
- Section 6: Assessment of the proposal's compliance with relevant planning policy at the national and local levels
- Section 7: Conclusions

# The Site, Location and Context

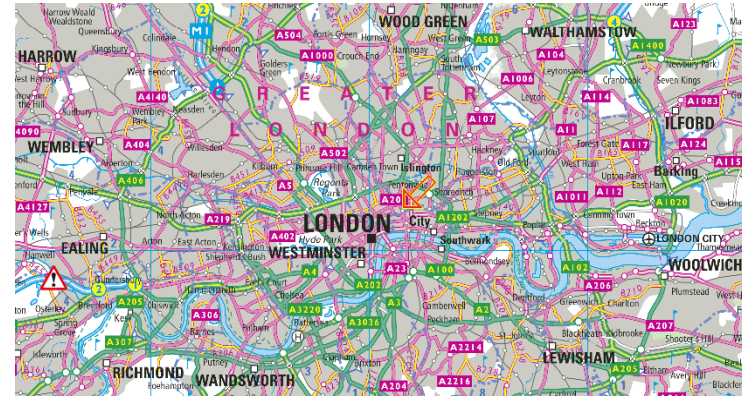
## The Site and its Surrounding Area

The site is situated in the London area of Clerkenwell, which lies within the London Borough of Camden in east London. The site itself is located on the south-eastern boundary line of the Borough of Camden, in Holborn and Covent Garden Wards. More specifically, it is located on the west side of Farringdon Road, just to the south of the junction with St Cross Street.

The site falls within the London's Town Centre Network and it lies within the Central Activities Zone (CAZ). Furthermore, it is situated in a close proximity to an International Centre in West End.

The Farringdon area contains a mixture of commercial and residential uses. The northern part of the area contains some industrial buildings, hotels and educational institutions, such as the Eastman Dental Hospital together with pockets of housing around Calthorpe Street, some of which are listed buildings. Towards the south is a large Royal Mail postal sorting office, which is partially situated in Camden and more modern office buildings fronting Grays Inn Road. Further south the area becomes more built up with a number of housing estates, which gives way to more office dominated uses. Within the southern area is the Leather Lane Neighbourhood Shopping Centre and street market and the Hatton Garden area, which contains a cluster of jewellery manufacturers and shops. Much of the southern area of Farringdon is located within the Hatton Garden Conservation area.

The immediate area within which the site is located is largely residential in nature, with other uses, such as post offices, schools, coffee shops, banks and other amenities situated within close proximity to the site.



**Image 1: Site in a wider context**



**Image 2: London Borough of Camden**

More specifically, the site is located within Hatton Garden Central London Area, which is London's and the UK's largest jewellery district and has been established as a centre for the jewellery and diamond trade since the 19<sup>th</sup> century.

In general, Camden's Central London area is characterised as:

- Being a key part of the nation's capital and a major international city;
- Being a part of London's Central Activity Zone (CAZ);
- having a significant residential population adding to its life, diversity and supporting economic and other functions;
- it is known for being a major employment centre and for having a significant retail centre, with central London frontages, neighbourhood centre and specialist shopping areas;
- it is highly accessible by public transportation.

There is a Neighbourhood Centre situated within close proximity to the site and Holborn Growth Area located south-west of the site.

In general, Camden is identified as a Borough that faces specific challenges in how to adapt to their growing population while improving and protecting its environment and its unique character.

The property is not a listed building; however, it is situated on the eastern boundary of Hatton Gardens Conservation Area.



Image 3: Site Location

### Hatton Gardens Conservation Area

The area contains few open spaces, therefore the emphasis is upon the streetscape and the appearance is of high urban density, particularly the narrower streets such as Leather Lane, Saffron Hill and Vine Hill.

The character and special interest of the Hatton Garden area is defined largely by the quality and variety of buildings and uses.

Much of the urban fabric remains small in scale with a mix of uses and a high concentration of small firms, whilst remaining an important focus for specialist industry and retailing. Many of the shops within the Hatton Garden area are occupied by small independent businesses.

## Existing Building and Uses

The application site is a 6 storey Victorian terraced property with a basement. The premises form part of a mixed-use building. Accommodation consists of a redundant retail unit situated on the ground floor (double shop) and a showroom with offices and storage situated in the lower ground floor and on the 1<sup>st</sup> floor of the property. The upper floors of the property and other properties that surround the site appear to be in use as residential units.

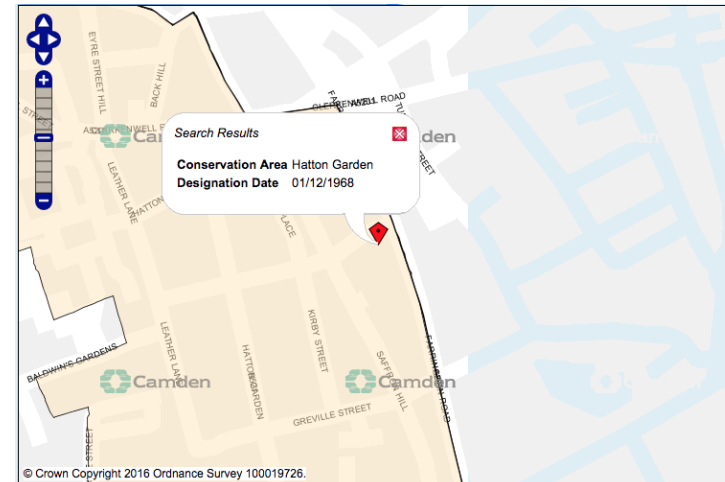
The residential units above the shop are accessed from an entrance located at the front of the property, in the middle section of the existing shop's front elevation. The double ground floor unit has an entrance via no 69 Farringdon Road. An internal staircase leads to first floor offices and basement.

The existing store has excessive storage facilities situated on the ground floor at the rear, as well as on the 1<sup>st</sup> floor. Furthermore, parts of the units are in poor condition, as demonstrated on the photographs below.

## Transport Links & Connectivity

The application site is located within an area with PTAL rate of 6b on a scale of 1 to 6b where 6b is the most accessible. The site is very well connected with Farringdon Tube Station and Farringdon Rail being 3 minutes' walk away from the site (200 meters), as well as Chancery Lane Tube Station located within a 6 minutes' walk. There are couple of car parks located nearby, namely Snowhill NCP located 2 minutes away and Caxton House NCP located within a 4-minute distance from the site.

which is also very well served by local buses.

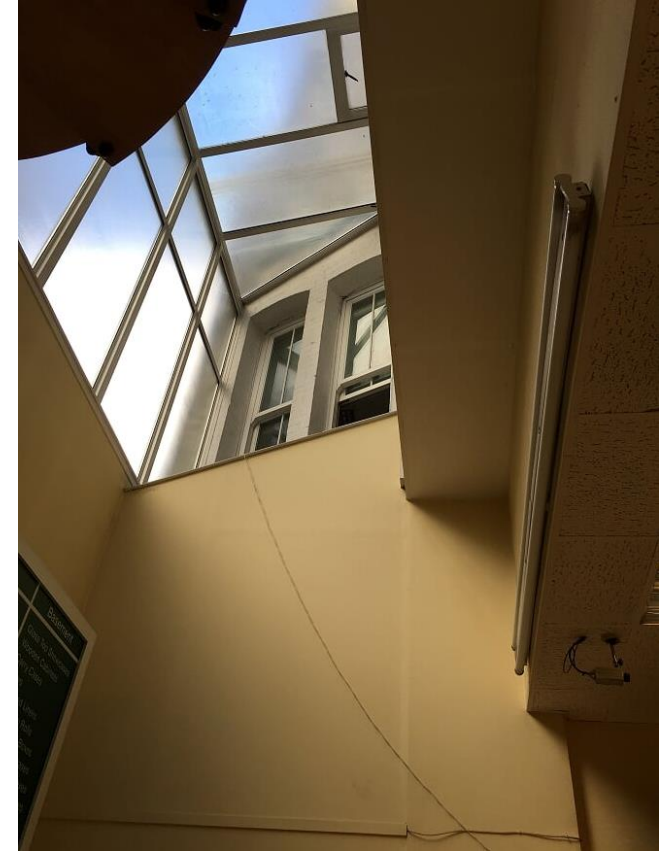


**Image 5: Location of the Site within the Conservation Area**



**Image 6: Image 5: Farringdon Road Underground & Rail Bus Links**

## Site Photographs (Exterior of the Building)



**Image 7: View to the Front Elevation of the Property**

**Image 8: View to the Rear Elevation**

**Image 9: View of the Atrium from within the Premises**

## Site Photographs (Interior of the Building)



Images 10-14: Interior of the premises, i.e. spiral staircase leading from the ground floor to the 1<sup>st</sup> floor; vacant basement, ground floor and 1<sup>st</sup> floor



Images 15-19: Interior of the premises, including storage areas and office spaces within the lower ground floor, ground floor and the 1<sup>st</sup> floor



## Planning History of the Site

The following table lists planning applications submitted in relation to the application site over recent years, as well as decisions made by the London Borough of Camden in respect of each application.

Application Number	Site Address	Development Description	Status	Date Registered	Decision
PS9804213	69-71 Farringdon Road, EC1	Erection of balconies at second to fifth floors on the rear elevation, as shown by drawing numbers 120.116b, 120.117a, 120.118a, 120.119a, and 120.120a.	APPEAL DECIDED	12-03-1998	Refuse Planning Permission
PS9704986R1	69-71 Farringdon Road, EC1	Change of use of 2nd to 4th floor from employment use (Class B1) and the erection of a roof extension to provide 5 residential units, as shown on drawing numbers 120.105B; 106B; 108-114; 116A; 117-120.	FINAL DECISION	05-12-1997	Grant Permission subject to Section 106
PS9704986	69-71 Farringdon Road, EC1	Erection of an additional storey and change of use of 1st to 4th floors to provide seven self contained flats. (plans submitted)	FINAL DECISION	18-09-1997	Withdrawn Application-revision received
PS9704190	69-71 Farringdon Road, EC1	Erection of a first floor rear glazed extension to house a new staircase, as shown by drawing numbers 120.102/103/104 and 105a.	FINAL DECISION	03-03-1997	Grant Full Planning Permission (conds)

## The Proposal

This planning application proposes to convert part of a redundant ground floor shop unit into two self-contained shop units and change the existing use of 1<sup>st</sup> floor retail unit into two self-contained flats with associated internal alterations to the basement, removal of a high atrium at rear elevation and replacement with ground floor roof with roof lights.

The proposal seeks to deliver:

- two residential units consisting of two self-contained studio apartments on the 1<sup>st</sup> floor;
- two self-contained retail units on the ground floor;
- new entrance to number 71 retail unit;
- new staircase to the basement;
- replacement of existing atrium with new lowered roof with a box gutter and Velux window, as well as roof lights.

Cycle provision and waste storage facilities will also be provided as part of the proposal.

This will be achieved through minor internal and external alterations.

The proposed scheme would essentially make use of the existing space available and optimise it.

### Rationale for the Scheme

Premises situated on the 1<sup>st</sup> floor were used primarily as storage and served an office function whilst in use.

Furthermore, the existing store has excessive storage facilities situated on the ground floor at the rear as well as on the 1st floor and the proposal seeks to better utilise the existing units by simplifying their layout to provide smaller, easier to access retail units and deliver much needed new residential accommodation suitable for single professionals and key workers.

### Unit Plans and Layout

There are no proposed extensions to the existing layout of the building, whereas the proposed internal layout will see minor alterations to maximise the internal use of the existing space.

Proposed alteration to the atrium will reduce the height of the existing extension and substitute it with a more subtle rooftop, which will be more in keeping with the wider area. This minimal alteration draws inspiration from the existing building, surrounding architecture and features of the surrounding area.

## Planning Consideration

### Appearance & Materials

The alterations to the proposed property shall be constructed using high quality materials to complement the existing appearance of the building. Materials used will be compatible with existing materials to match the original and neighbouring building, whilst complementing and enhancing it.

### Access

Access to the existing and proposed residential units located on the upper floors of the building will be retained with additional access proposed to the unit at 71 Farringdon Road.

### Impact on Neighbouring Properties

It is not considered that the proposed change of use would be detrimental to any of the surrounding mixed-use properties. The site is situated within a predominantly residential area with retail/office units located on the ground floor, hence the proposed conversion of an existing retail unit into two self-contained units and the change of use of the 1<sup>st</sup> floor from retail to residential use will be in keeping with the existing character of the area.

### Loss of Employment

There will be no loss of employment.

### Highway Safety

The proposed dwelling will not provide any additional parking for the residential units, however there are two sizeable car parks situated within a close proximity to the site, which is also well-served by public transportation. The site has an excellent PTAL rating of 6b (best).

### Cycle Provision

Although the site is located within a sustainable location with excellent access to public transportation, two cycle parking spaces will be provided as part of the proposal.

### Waste Storage

As part of the proposal waste storage area will be located on the ground floor of the property underneath the staircase.

Occupants of the proposed units will make appropriate arrangements with the Council to collect the waste and recycle waste.

# Drawings

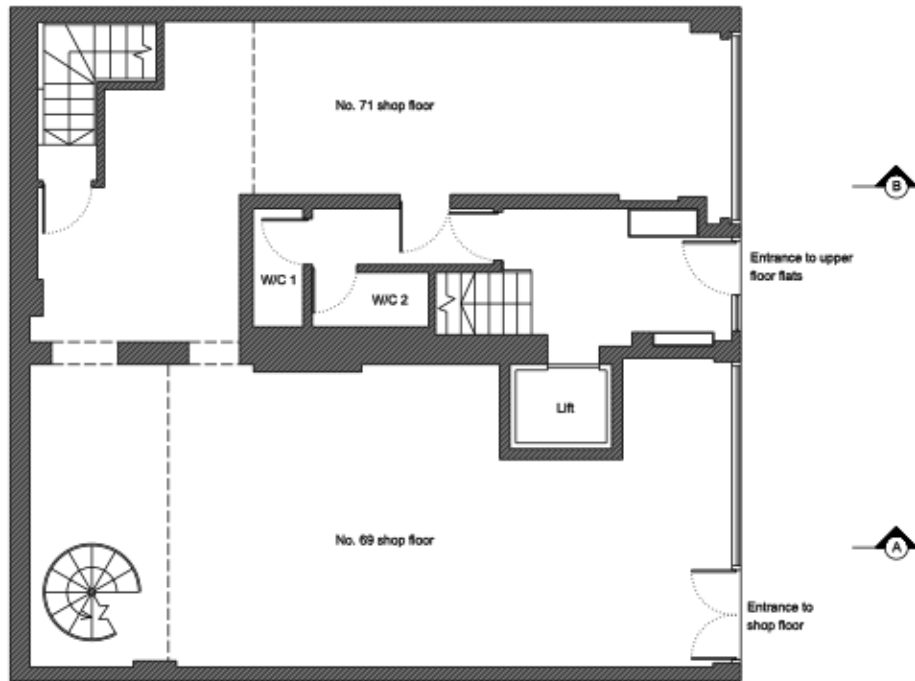


Image 20: Existing Ground Floor

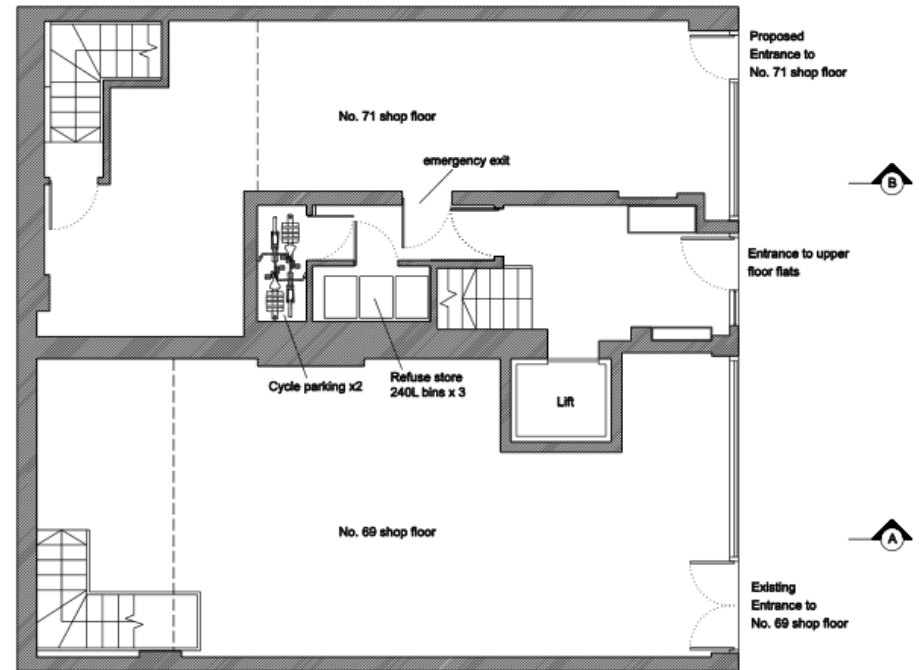


Image 21: Proposed Ground Floor

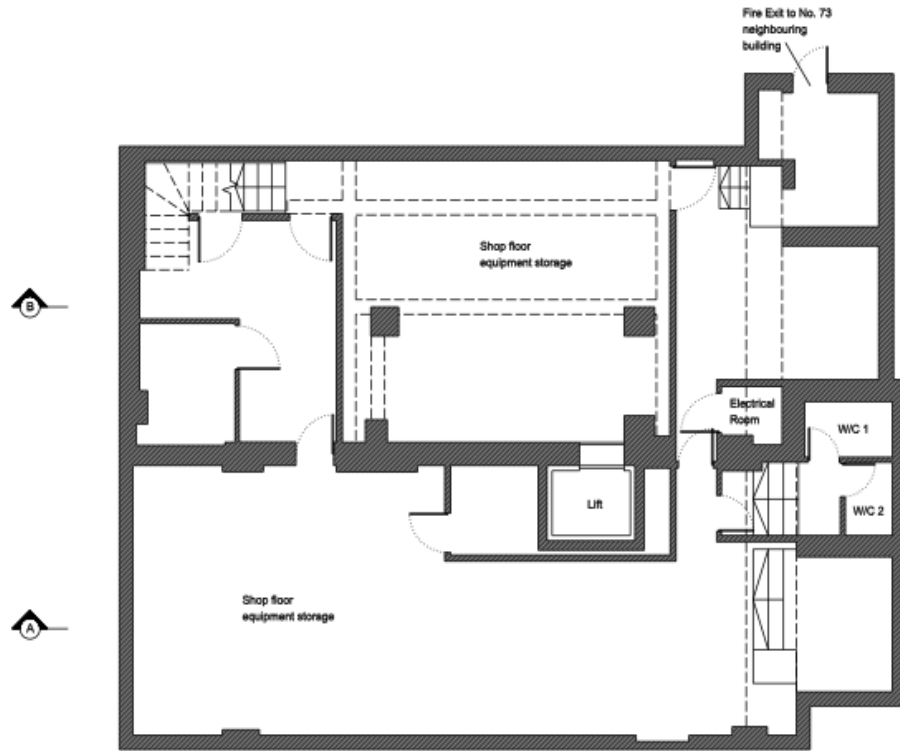


Image 22: Existing Lower Grounf Floor

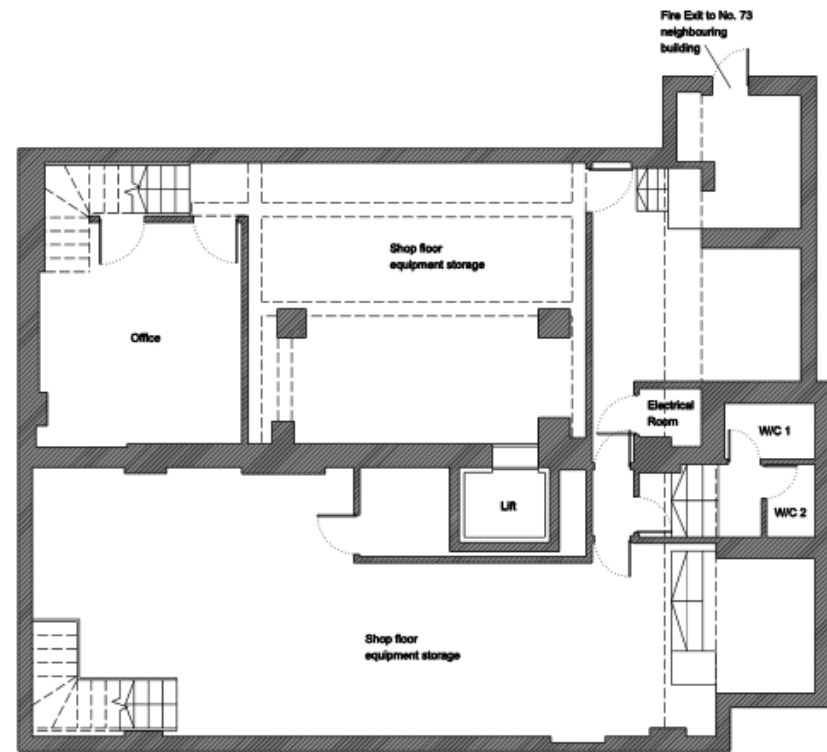


Image 23: Proposed Lower Grounf Floor

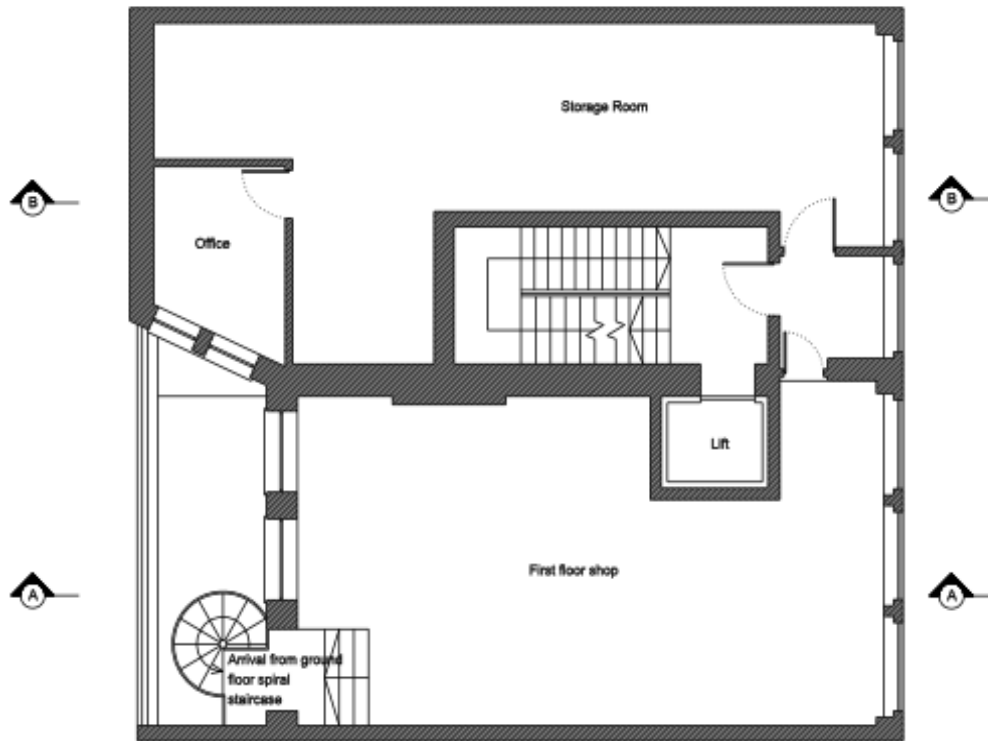


Image 24: Existing 1st Floor

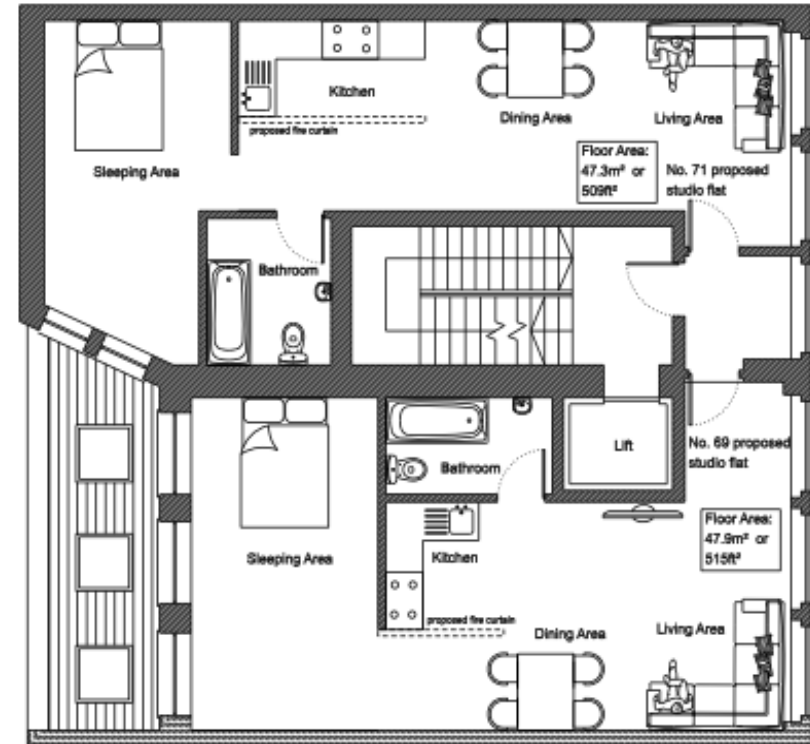


Image 25: Proposed 1st Floor

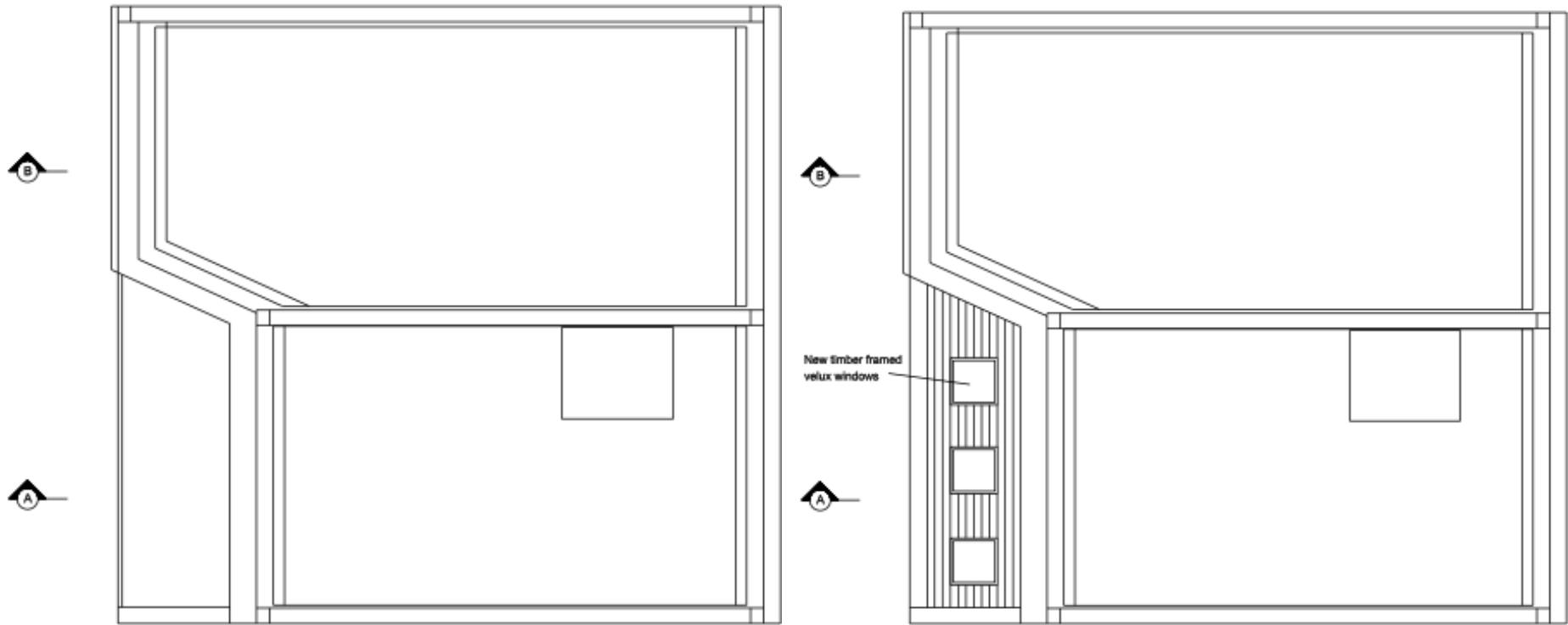
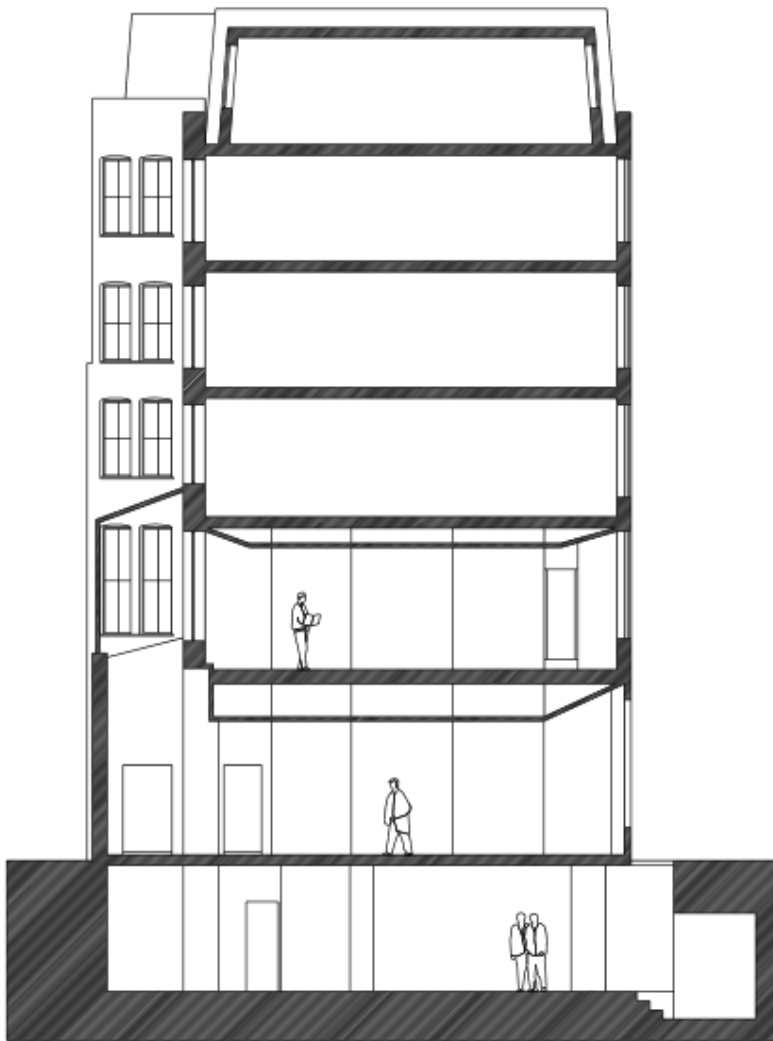
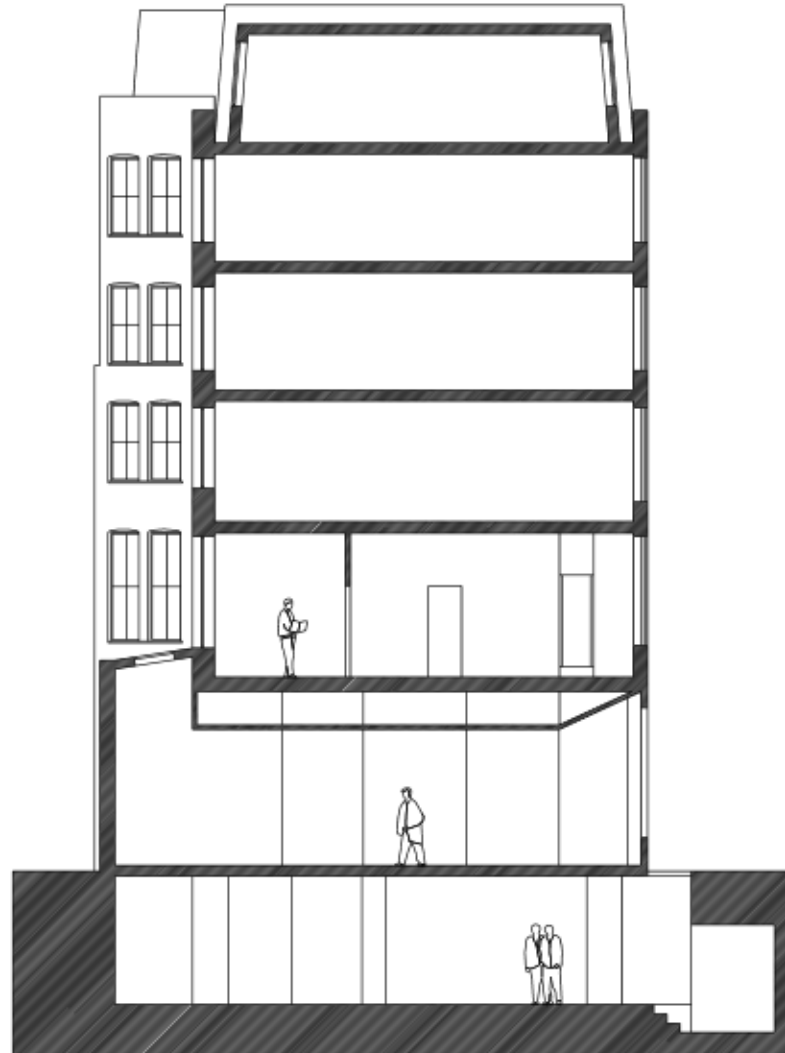


Image 26: Existing Roof Plan

Image 27: Proposed Roof Plan



**Image 28: Existing Section AA**



**Image 29: Proposed Section AA**



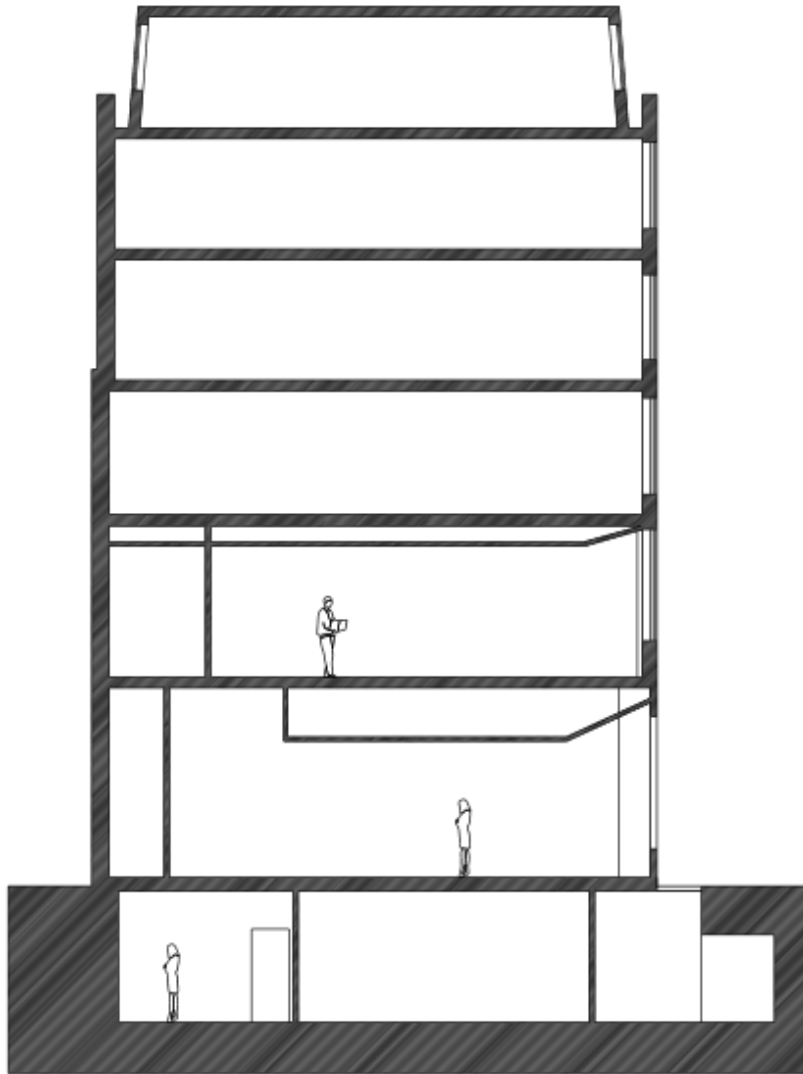


Image 30: Existing Section BB

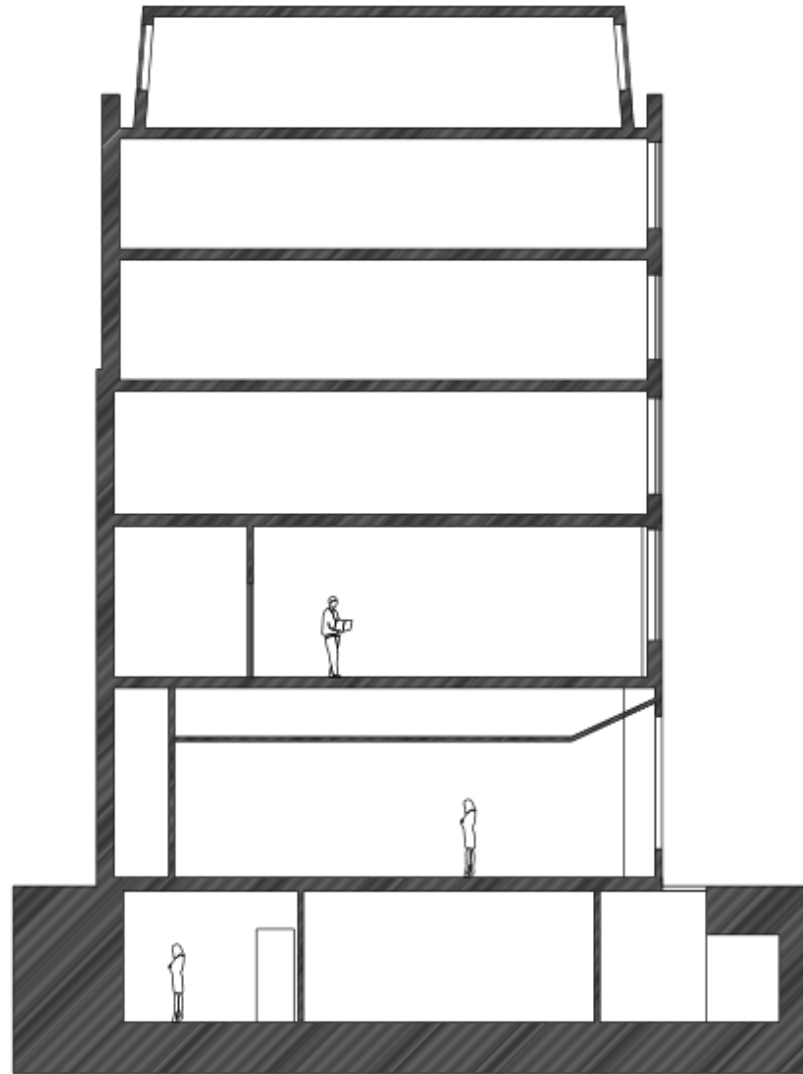


Image 31: Proposed Section BB



Image 32: Existing Front Elevation

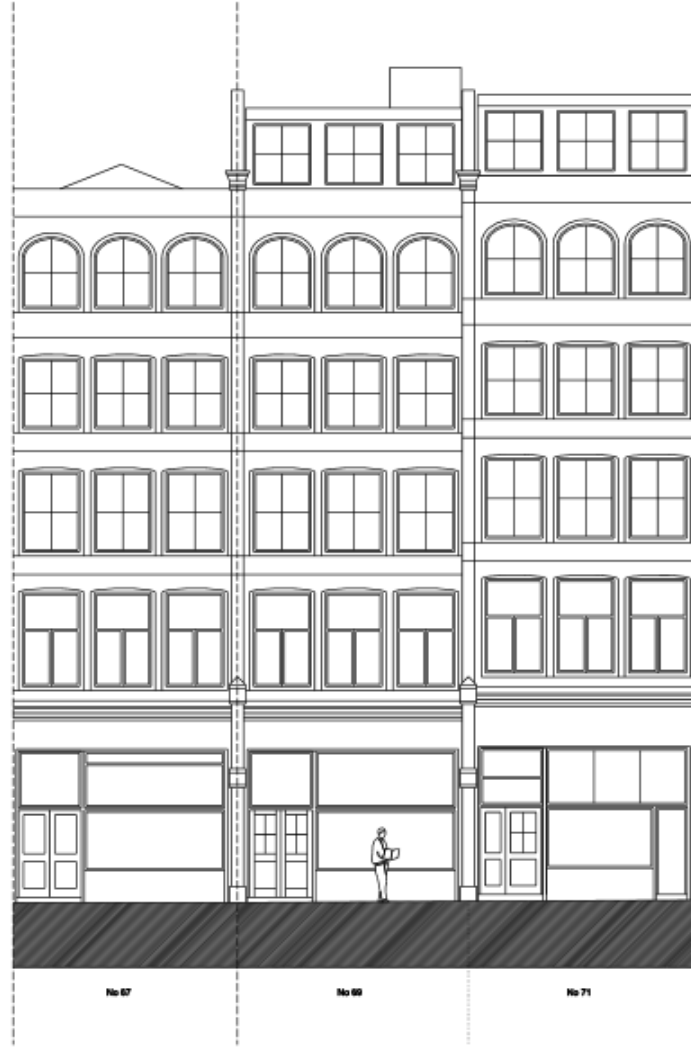


Image 32: Proposed Front Elevation



Image 32: Existing Rear Elevation



Image 32: Proposed Rear Elevation

## Planning Policy Assessment

This section of the document provides a summary of key planning policies relevant to the determination of the application at all levels of the planning system. Camden's Local Development Framework consists of the Core Strategy (2010-2025), which is soon to be replaced by the Local Plan (2016-2031), draft version of which is already in place.

### **National Planning Policy Framework (2012)**

The NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development (para 49). At its heart, it adopts 12 key principles including proactively driving, supporting sustainable economic development, and promoting mixed-use development to encourage multiple benefits for the use of land in urban areas.

The NPPF advocates the use of mixed-use development particularly where it benefits from a sustainable location and would make more efficient use of an existing space to boost local housing supply.

Section 6 of the NPPF is concerned with *'delivering a wide choice of high quality homes'*.

According to the NPPF, planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but also over the lifetime of the development. Furthermore, they should *'optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities...'* (Paragraph 58, NPPF 2012).

Furthermore, it is recognised that in need to facilitate the provision of new dwellings the Town and Country General Permitted Development Order relaxed previous permitted development rights to enable the change of use of an upper floor of a retail unit into a maximum of two residential units without the express need for planning permission.

Consequently, it is considered that the principle of the conversion of the upper floor of 69-71 Farringdon Road to residential use is acceptable subject to meeting other material planning considerations.

Paragraph 14 states that the cornerstone of the NPPF is the *'presumption in favour of sustainable development'*, which is confirmed as a *'golden thread'* running through both plan making and decision taking. For decision taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
  - (i) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
  - (ii) Specific policies in the Framework indicate development should be restricted.

Paragraph 51 states that *'Local planning authorities [...] should normally approve planning applications for change to residential use [...] where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.'*

According to paragraph 9 *'pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):*

- *making it easier for jobs to be created in cities, towns and villages;*
- *replacing poor design with better design;*
- *improving the conditions in which people live, work, travel and take leisure; and*
- *widening the choice of high quality homes'.*

The following include some of the Core planning principles (para 17):

- *promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas;*
- *proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;*
- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;*

### **The London Plan (The Spatial Development Strategy for London Consolidated with Alterations since 2011), March 2016**

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years.

Para 1.4 states that *'London's population is likely to continue to grow. By the 2020s there are likely to be more Londoners than at any time in the city's history'* and *'it will continue to be younger than elsewhere in England and Wales.'*

The London Plan highlights the need to cater for *'substantial population growth, at least in the short to medium term, ensuring London has the homes, jobs, services, infrastructure and opportunities a growing and ever more diverse population requires'*. It goes on to say that *'doing this [should be done] in ways that do not worsen quality of life for London as a whole, [which] means we will have to ensure we make the best use of land that is currently vacant or under-used'*.

Para 3.13 reads that *'London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs (as set in Policy 3.3: Increasing Housing supply)'* and..... *'to achieve these aims, [The Mayor] is committed to taking effective steps to encourage the provision of new homes through the policies in this Plan (which deal with identifying housing need and capacity to help meet this) and in his London Housing Strategy (which deals, among other things, with detailed questions of investment and delivery for which he has particular responsibility).'*

Table 3.1 Annual average housing supply monitoring targets 2015-2025 sets the minimum ten year target (2015-2015) for Camden at 8,892 and 889 for the Annual Monitoring target for 2015-2025.

Planning Policy 3.3 further states that *'(E): Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:*  
*a intensification (see policies 2.13, 3.4)*  
*d mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility (see policies 2.7, 2.11, 4.2-4.4)'*

Policy 3.4 *Optimising Housing Potential* further states that in *'LDF preparation and planning decisions [...] taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range.'*

Policy 3.5 *Quality and Design of Housing Developments*, reads that *'housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live..'* Part C goes on to say that *...'New homes should have adequately sized rooms and convenient and*

*efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process.*

According to Para 3.32 *'securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities'*.

Policy 3.8 *Housing Choice*, highlights that *'Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments'*

Paragraph 4.5 explains that *'the policies in this Plan are also intended to provide the basis for success of all kinds and sizes of enterprise. London has around 800,000 enterprises ranging from large, office based employers to small and medium-sized ones (which represent about 48 per cent of London employment) ...'* The Mayor seeks to strengthen London's existing economy, through Policy 4.1 *Developing London's Economy*, which reads that *'A The Mayor will work with partners to: a1) promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors'*.

According to Map 2.6 *London's Town Centre Network*, the site falls within the London's Town Centre Network. It lies within the Central Activities Zone (CAZ), in close proximity to an International Centre.

Policy 2.10 *Central Activity Zone – Strategic Priorities* states (amongst other things) that: *'A The Mayor will, and boroughs and other relevant strategic partners should: f support and improve the retail offer of CAZ for residents, workers and visitors'*

This is further supported by Policy 2.11: *Central Activities Zone – Strategic Functions*, which states that *'A The Mayor will, and boroughs and other relevant agencies should: g ensure development complements and supports the clusters of other strategically important, specialised CAZ uses including legal, health, academic, state and 'special' uses while also recognising the 'mixed' nature of much of the CAZ'*.

The requirement for smaller retail units is further reinforced in Para 4.51, which reads that *'The Mayor [being] committed to supporting town centres, a dynamic, competitive and diverse retail sector and small and medium sized enterprises. In parts of London, small shops are in short supply and affordability is a key concern, particularly for independent retailers and small enterprises.'*

**London Plan Supplementary Planning Guidance: Housing SPG (March 2016, updated 4th May 2016)**

The Housing SPG has been updated to reflect the Further Alterations to the London Plan (FALP) and the Minor Alterations to the London Plan (MALP). It provides updated guidance on a range of strategic policies including housing supply, residential density, housing standards; build to rent developments, student accommodation and viability appraisals.

Para 1.1.28 of the document states that *‘The SHLAA provides the ‘compelling evidence’ necessary to justify a windfall allowance for small sites based on historic trends, in line with paragraph 48 of the NPPF and reflecting the distinct circumstances in London. Windfall assumptions are based on average annual completion rates on small sites (under 0.25ha) in each borough over an eight-year period (2004/5 to 2011/12). Trends show housing has been consistently delivered on small sites in the past and demonstrate robustly that this can be expected to provide a reliable source of future supply.’*

Furthermore, Para 1.2.25 states that *‘Boroughs should proactively enable and fully realise the potential for small sites and make a substantial contribution to housing delivery in London, taking into account the strategic need to optimise housing output (Policy 3.4) and increase housing supply (Policy 3.3). Small sites (below 0.25ha) play a crucial role in housing delivery in London. Between 2005 and 2013 on average 10,100 net housing completions were provided each year on small sites, representing 38% of overall housing supply in London. Projected housing delivery on small sites accounts for 25% of London’s overall capacity identified in the SHLAA and is expected to comprise over 50% of overall supply in the case of a number of individual boroughs.’* It goes on to say that *‘Residential and mixed use redevelopment on small sites can make a sizeable contribution to housing capacity in appropriate locations where there is good accessibility, particularly in town centres, along high streets and other movement corridors. Small-scale infill development opportunities are also critical in encouraging the sensitive renewal and intensification of existing residential areas (Policy 3.3Ee)...’*

According to Para 1.2.27 *‘enabling as broad as possible a range of small sites to contribute to overall housing supply is vital in order to accelerate housing delivery in London and help minimise the capital’s reliance on very large schemes.’*

Para 1.2.55 goes on to say that *‘the upper storeys of town centre retail and other buildings accommodate a variety of uses, including storage and offices as well as flats. Many of these are economically viable and continue to make important contributions towards meeting local needs. However, a significant number are under-occupied or vacant’.*

The London Plan also recognises that *‘...while the best use should be made of development opportunities, proper account must be taken of the range of factors which have to be addressed to “optimise,” rather than simply maximise, housing potential. Of particular importance are ensuring good design and taking into account public transport capacity and local context and character [...] This balanced approach to optimising output is supported by the London Plan’s broad design policies in Chapter 7 and the specific housing standards proposed in Policy 3.5. Taking all these factors into account independent*



*consultants suggest that for the purposes of the Plan, ‘optimisation’ can be defined as ‘developing land to the fullest amount consistent with all relevant planning objectives’ (Para 1.3.1).*

Standard 7 (and Policy 3.8) seek to ensure that *‘development proposals [...] demonstrate how the mix of dwelling types and sizes and the mix of tenures meet strategic and local need and are appropriate to the location’.*

Standard 10 – *Active frontages* requires proposals to maximise active frontages and minimise inactive frontages situated on the ground floor of facing publically accessible space, in order to provide natural surveillance and activity. For the avoidance of doubt para 2.3.3 defines active frontages as *‘development frontage on the ground floor where inhabited residential or non-residential uses are located, with a visually permeable elevation (eg windows or glazing) and a generous distribution of entrances’.* Para 2.3.4 continues to say that *‘the principle of maximising active frontages and minimising inactive frontages is a critical element of the London Plan’s approach to designing out crime (Policy 7.3) and applies with equal importance to residential and mixed use neighbourhoods’.*

Furthermore the London Plan explains that *‘town centre housing at higher densities close to public transport facilities is especially suitable for one and two person households, particularly singles, couples and sharers, students and older people’ (Para 7.4.9).*

### **Central Activities Zone SPG (March 2016)**

Paragraph 4.2.1 of the document *stats that ‘housing delivery within the CAZ makes an important contribution to overall housing supply in London, providing on average around 2,000 net additional conventional homes a year between 2004/5 to 2013/14 This amounts to approximately 8 per cent of overall conventional housing completions in the capital. As in other areas of London, delivering this level of housing output in order to meet housing need will require recent levels of housing completions in parts of the CAZ to be increased’.* According to Para 4.5.2 *‘in addition, CAZ boroughs should also rigorously examine the potential for additional housing through the sensitive intensification and renewal of existing residential areas. This should be achieved by optimising potential housing output on small sites, especially where there is good accessibility, and by positively encouraging well-designed infill development.*

### **Draft Camden Local Plan (2015)**

Camden’s Local Development Framework consists of the Core Strategy (2010-2025), which is soon to be replaced by the Local Plan (2016-2031) the draft version of which is already in place.

## Draft Camden Local Plan 2015

On 24 June 2016 the Council submitted the Camden Local Plan and supporting documents to the Secretary of State for Communities and Local Government for independent examination, hence although not adopted yet, as the Council's Local Plan has been submitted for examination, policies within the Local Plan can therefore be given (limited) consideration when determining planning applications.

Camden's Draft Local Policy lists the following strategic objectives amongst others:

*'1. To create the conditions for growth ensuring it takes place in the most appropriate and sustainable locations and minimises the impacts of development and to harness the benefits of this growth so it meets the needs of Camden's communities for homes, jobs and services and preserves and enhances the borough's unique character and appearance.*

*3. To provide homes that meet the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of dwelling sizes. Self-contained housing is the priority use of the Local Plan*

*4. To strengthen Camden's nationally-important economy, in terms of business and employment, the knowledge economy, shopping and entertainment, culture, entertainment and tourism, and to secure benefits for local people to reduce inequalities in the borough through increased access to jobs, skills, training and education opportunities, ensuring nobody gets left behind.'*

Policy G1 *Delivery and Location of Growth* states that *'the Council will create the conditions for growth to deliver the homes, jobs and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough'*. This will be delivered through *'growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:*

*a. supporting development that makes full 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;*

*b. resisting development that makes inefficient use of Camden's limited land;*

*c. expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and / or*

*d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.'*

The document highlights that growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities set out below.

It continues to say that: *'development will take place throughout the borough with the most significant growth expected to be delivered through:*

*e. a concentration of development in the growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road;*

*f. appropriate development at other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead;...'*

Policy H1 *Maximising Housing Supply* states that *'the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,100 additional homes from 2015/16 - 2030/31, including 11,130 additional self-contained homes.*

*[The Council] will seek to exceed the target for additional homes, particularly self-contained homes by:*

- a. regarding self-contained housing as the priority land-use of the Local Plan;*
- b. working to return vacant homes to use and ensure that new homes are occupied;*
- c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document;*
- d. expecting the maximum appropriate provision of housing on sites that are underused or vacant; and*
- e. where other uses are needed on the site, expecting development for a mix of uses including self-contained housing where appropriate.'*

Para 3.14 explains that *'Further Alterations to the London Plan indicate that the number of additional homes required across London exceeds the identified capacity for additional homes by as many as 7,000 per year'*. The Draft Plan confirms that *'meeting needs in Camden will also be challenging, with a gap of almost 200 homes per year between [the Borough's] housing need (based on household projections, existing needs and past shortfalls) and the housing capacity (as assessed for the London Plan's monitoring benchmark)'*.

It is considered that *'self-contained homes have the greatest potential to provide for a variety of household types with a reasonable standard of privacy and amenity'*, as *'they generally have the space and flexibility to provide for people whether they are young or old, single people (often sharing), couples or families, and disabled people or people who need a carer for certain activities or overnight'* (Para 3.15).

Policy H6 *Housing Choice and Mix* states that *'the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking a wide variety of high quality homes suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs'*.

To achieve this the LPA will:

- 'a. seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes, and particularly promote the development of private rented homes where this will assist the creation of mixed, inclusive and sustainable communities;*
- b. seek provision suitable for families with children, older people, people with disabilities, service families and people wishing to build their own homes;*
- c. expect a range of dwelling types and sizes to meet the particular needs of existing and future households as set out in policy H7;*
- d. expect 10% of homes to be designed so that they are suitable for occupation by a wheelchair user or could be easily adapted for occupation by a*

wheelchair user, secured through Building Regulations as appropriate; and

e. expect all remaining housing to be designed to satisfy the principles of Lifetime Homes criteria, secured through Building Regulations as appropriate.'

Policy H7 *Large and Small Homes* further states that 'the Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply'. This will be achieved by ensuring that 'all housing development, including conversion of existing homes and non-residential properties:

a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and

b. includes a mix of large and small homes.'

Furthermore, the LPA will 'take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:

c. the different dwelling size priorities for social-affordable rented, intermediate and market homes;

d. any evidence of local needs that differ from borough wide priorities;

e. the character of the development, the site and the area, including the impact of the mix on child density;

f. site size, and any constraints on including homes of different sizes;

g. the economics and financial viability of the development; and

h. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.'

Policy E1 *Promoting a Successful and Inclusive Camden Economy* requires that the Council 'secure[s] a strong economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses'. This will be achieved through:

'a. support businesses of all sizes in particular start-ups, small and medium-sized enterprises;

b. maintain a stock of premises that is suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;

i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.'

Policy D1 *Design* requires development to be of the highest architectural standard and Policy D2: *Heritage* requires that proposals do not cause harm to Conservation Areas and/or Listed Buildings.

Draft Local Plan further states that 'The Council supports the development of housing within centres and Central London including above shops where it does not prejudice the ability of the ground floor unit to be used for town centre uses and to help meet the housing need'. Policy TC3 *Protecting Shops Outside of Centres* further states that 'the Council will seek to protect shops outside centres' and only grant planning permission 'for development that involves loss of a shop outside designated centres provided:

a. alternative provision is available within 5-10 minutes' walking distance;

- b. there is clear evidence that the current use is not viable; and*
- c. within the Central London Area, the development positively contributes to local character, function, viability and amenity.'*

According to Para 9.43 of the document *'small shops, often run by independent traders and providing specialist shopping, help to sustain the diversity, vibrancy and character of our centres and smaller shopping areas and provide suitable premises for local businesses. As the retail market changes there is a trend towards fewer larger shops. Many residents [in Camden] have expressed support for measures to encourage small shops and initiatives to encourage and promote retail diversity and entrepreneurialism in the borough'.*

Policy TC5: *Small and Independent Shops* state that *'the Council will promote the provision of small shop premises suitable for small and independent businesses'.*

[The Council] will:

- 'a. expect large retail developments to include a proportion of smaller units;*
- b. attach conditions to planning permissions for retail developments to remove their ability to combine units into larger premises, where appropriate; and*
- c. encourage the occupation of shops by independent businesses and the provision of affordable premises.'*

### **Camden Core Strategy (2010-2025)**

Camden's Core Strategy sets out the key elements of the vision for the borough, including when it was adopted and how it was prepared.

Para 17 of the Core Strategy explains what makes southern part of the borough, which forms part of Central London unique as, *'dynamic mix of uses, activities and facilities of London-wide and international significance. It is also home to a significant resident population.'*

It further highlights that *'Camden has a relatively young population, with a concentration of people (over 70%) in the working ages (16-59/64)'. Furthermore, 'Camden has the largest population of students in London' (page 8).*

According to the Core Strategy, Camden is also considered *'third largest contributor to London's economy and provides around 1% of Britain's economy'* despite being a small borough. Camden also *'has a small average household size (2,06 persons per household) compared to England and Wales as a whole (2,36) and a number of single person households is growing among both younger and older people' (page 9).*

One of the main themes within the vision for Camden is 1) A sustainable Camden that adapts to growing population and B) A strong Camden economy that includes everyone.

Policy CS1- *Distribution of Growth* requires that LPA makes *'the best use of Camden's limited land'*. To do so, the *'Council will promote the most efficient use of land and buildings in Camden be:*

*d) seeking development that makes full 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;*

*h) expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible.'*

According to Map 1: Key Diagram, the site falls within an area considered a Highly Accessible Area.

Para 1.8 of the document states that *'housing will be considered the priority land use of this Core Strategy and the Council's other LDF documents'*.

According to Para 1.21 if Camden is *'going to adapt successfully to its growing population, [it] needs to make the best use of the borough's limited land'*. As such *'Camden will promote the most efficient use of Camden's land and buildings...'*

Para 3.8 defines the Farringdon/Smithfield area, which covers Camden's Central London area at Hatton Gardens, is included in the London Plan as an Area for intensification. The London Plan expects a minimum of 100 homes and 2,000 jobs at this location between 2001-2026.

Policy CS5: *Managing the Impact of Growth and Development* states that *'the Council will manage the impact of growth and development in Camden by ensuring that development meets the full range of objectives of the Core Strategy and other LDF documents, with particular consideration given to (amongst other things) 'providing uses that meet the needs of Camden's population and –wide role contribute to the borough's London'*.

Policy CS7: *Promoting Camden's Centres and Shops* states that the LPA:

*'e) seeks to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;*

*g) protect and promote small and independent shops, and resisting the loss of shops where this would cause harm to the character and function of a centre.'*

According to para 7.17 *'small and independent shops contribute to the character and diversity of Camden's centres by adding to the choice and variety of shopping facilities available, and avoiding centres being dominated by national multiple retailers.'* It goes on to say that *'the Council will seek to promote the provision of small units where appropriate and independent shops were possible'*.

This is further reinforced by Camden's centre specific planning objectives, which include:

*- 'seeking to protect the special character and attractiveness of Camden Town by pursuing the continued provision of small shops units.'*

Policy CS6- *Providing Quality Homes* states that the ‘Council will aim to make full use of Camden’s capacity for housing by:

- a) *maximising the supply of additional housing to meet or exceed Camden’s target of £5,950 homes from 2007-2017, including 4,370 additional self-contained home;*
- b) *maximising the supply of additional housing over the entire plan period to meet or exceed a target of 8,925 homes from 2010-2025, including 6.550 additional self-contained homes;*
- e) *regarding housing as the priority land-use of Camden’s Local Development Framework’.*

It is noted that Camden will regard housing as a top priority when considering the future of unused and underused land and buildings.

Para 6.37b states that ‘*The range of house sizes sought in Camden should reflect the household sizes [local residents] expect to live in’.* Based on the 2001 Census ....’*one-person households were the most common type (46% of household)*’. Furthermore ‘*GLA population projections predict that the proportion of one-person households will rise to 51% by 2026...*’,

Policy CS8- *Promoting a Successful and Inclusive Camden Economy* highlights (amongst other things) the need to promote and protect the jewellery industry in Hatton Gardens.

According to Para 8.20, although Camden has a large proportion of small businesses, three quarters employing less than five people, there is a lack of high quality premises suitable for small businesses, particularly those less than 100sqm.

Page 126 further highlights the fact that ‘the southern part of the borough is where most of Camden’s future growth will take place’.

### **Development Policies (2010-2025)**

Camden Development Policies set out detailed planning criteria that the LPA uses to determine applications for planning permission in the borough, including when they were adopted and how they were prepared.

Policy DP2: *Making full use of Camden’s capacity for Housing* sets out in more details how planning decisions to deliver the aims of policy CS6 of the core Strategy will be delivered. It states that ‘*The Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing, by:*

- a) *expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site;*

Policy DP5 – *Homes of Different Sizes* states that the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes.

Policy DP 10: *Helping and Promoting Small and Independent Shops* helps safeguards small shops, which are threatened by continuing trend towards fewer, larger shops. Small shop premises help encourage and promote retail diversity and entrepreneurialism.

Policy SP24- *Securing High Quality Design* requires that *'all developments, including alterations and extensions to existing buildings, to be of the highest standards of design and will expect developments to consider:*

- a) character, setting, context and the form and scale of neighbouring buildings;*
  - b) the character and proportions of the existing building, where alterations and extensions are proposed;*
  - c) the quality of materials to be used;*
  - d) the provision of visually interesting frontages at street level;*
  - e) the appropriate location for building services equipment;*
  - f) existing natural features, such as topography and trees,*
  - g) the provision of appropriate hard and soft landscaping including boundary treatments;*
- the provision of appropriate amenity specie; and accessibility.'*

Policy DP26: *Managing the Impact of Development on Occupiers and Neighbours* requires developments to provide acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space.

### **Site Allocations**

Camden's Site Allocations document identifies land and buildings for future development.

The site allocations document forms part of the Local Development Framework for Camden and will set out some guidelines for future development on significant sites which have been or are likely to be subject to development proposals. It applies to sites across the borough.

The document highlights that Camden is growing and the forecast growth in population will be accompanied by an increase in the number of homes.

It goes on to say that *'a Sustainable Camden that adapts to a growing population was one of the four themes within the vision of Camden Together, Camden's previous Community Strategy'*.



The document further states that *'The Core Strategy is one of the main mechanisms ...in relation to growth, where it happens and how it is managed. This will be done by:*

- making the best use of limited land;*
- making housing the priority land use;*
- supporting town centres and shops;*
- promoting mixed-use development in achieving sustainable economic growth;*
- promoting sustainable transport.'*

Page 14 states that the potential for new development can occur when:

- ' buildings and/or uses are no longer required and become surplus to requirements*
- needs or opportunities are identified for new uses*
- existing occupiers and activities need to expand*
- windfalls emerge as land ownership changes or business or other uses close down or relocate'*

The Council's aspirations for the Farringdon area include provision of a mix of land uses (p 101).







The proposal site is not included in the site allocation document.

### **Policies Map**

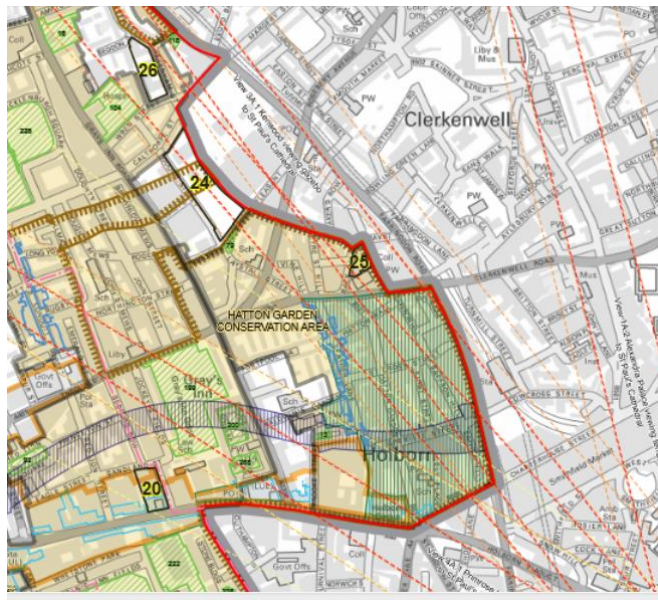
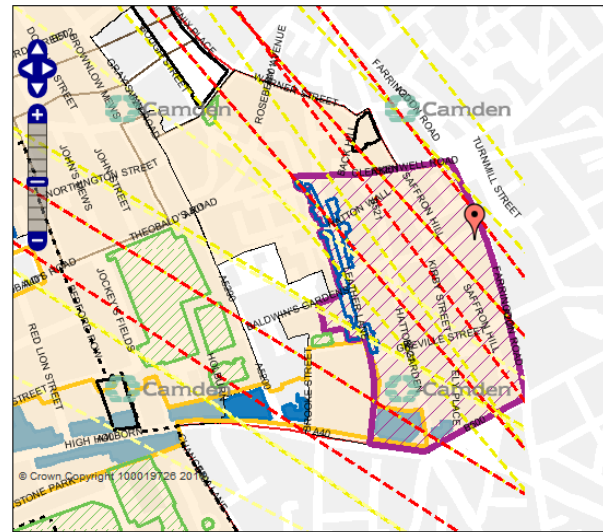
The policies map (formerly known as the proposals map) displays the planning policies in Camden.












Find planning policies by clicking the map or using the address / postcode search










**Map key**

-  Designated View
-  2A.1 Parliament Hill summit to St Paul's Cathedral - Right Lateral Assessment Area
-  Archaeological Priority Area  
London Suburbs
-  Central London Area  
Central London Area (Clear Zone Region) CLA
-  Conservation Area  
Hatton Garden
-  Hatton Garden Area  
Hatton Garden

For more information, or if you are unable to view the map, please contact the [Forward Planning and Projects Team](#)



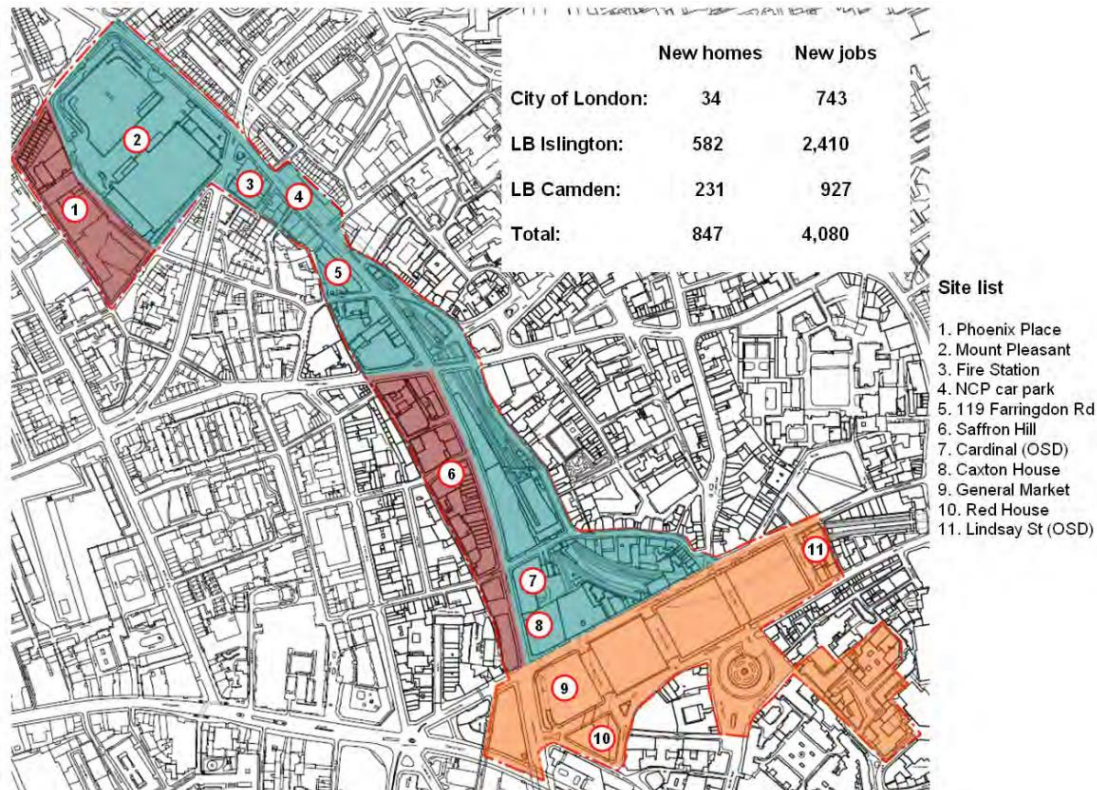
- | General  |   |
|--|---|
|               | Growth Area                                     |
|               | Central London Area                             |
|               | Proposal site                                   |
|               | Fitzrovia Area Action Plan                      |
|               | Euston Area Plan                                |
|               | Euston station and tracks special policy area   |
|             | Regent's Park Estate housing renewal and infill |
|             | Neighbourhood Plan Area (adopted plan)*         |
| *The Kentish Town Neighbourhood Plan is due to be adopted by Full Council on 29 September 2016 |   |
| Built Environment  |   |
|             | Conservation Area                               |
|             | Ancient Monument                                |
|             | Archaeological Priority Area                    |
| Designated Views   |   |
|             | Viewing Corridor                                |
|             | Lateral Assessment Area                         |
|             | Background Assessment Area                      |
| Natural Environment  |   |

- | Natural Environment   |                                     |
|---|-------------------------------------|
|    | Open Space                          |
|    | Metropolitan Open Land              |
|    | Site of Special Scientific Interest |
|    | Ancient Woodland                    |
|    | Metropolitan Walk                   |
|    | Habitat Corridor, missing link      |
| Town Centres and Employment   |                                     |
|  | Central London Frontage             |
|  | Town Centre                         |
|  | Neighbourhood Centre                |
|  | Industry Area                       |
|  | Hatton Garden Area                  |
| Transport   |                                     |
|  | Safeguarding Area                   |
| Waste and Minerals  |                                     |
|  | Waste Safeguarding Site             |
|  | Aggregate Safeguarding Site         |

Images 30&31: Policy Map Extracts

### Finsbury Local Plan - Farringdon Intensification Area (August 2012)

Para 2.3 of the document says that the DRLP identifies capacity for an additional 2,500 jobs and 850 homes to be provided within this area by 2026.



**Image 32: DRLP Intensification Area Jobs and Housing Figures**

### Camden Planning Guidance

Camden Planning Guidance is a series of documents that provide advice and information on how the LPA applies our planning policies. Camden prepared Camden Planning Guidance to support the policies in the Core Strategy and Development Policies documents.

### Camden Planning Guidance – Town Centres, Retail & Employment (September 2013)

London Borough of Camden prepared this guidance to support the policies in the local Development Framework and as such, it is consistent with the Camden Core Strategy and Camden Development Policies, and is a formal Supplementary Planning Document (SPD), which is additional ‘material consideration’ in decision-making.

The Image below shows that the site falls within the Central London Local Area and it forms part of a secondary frontage.

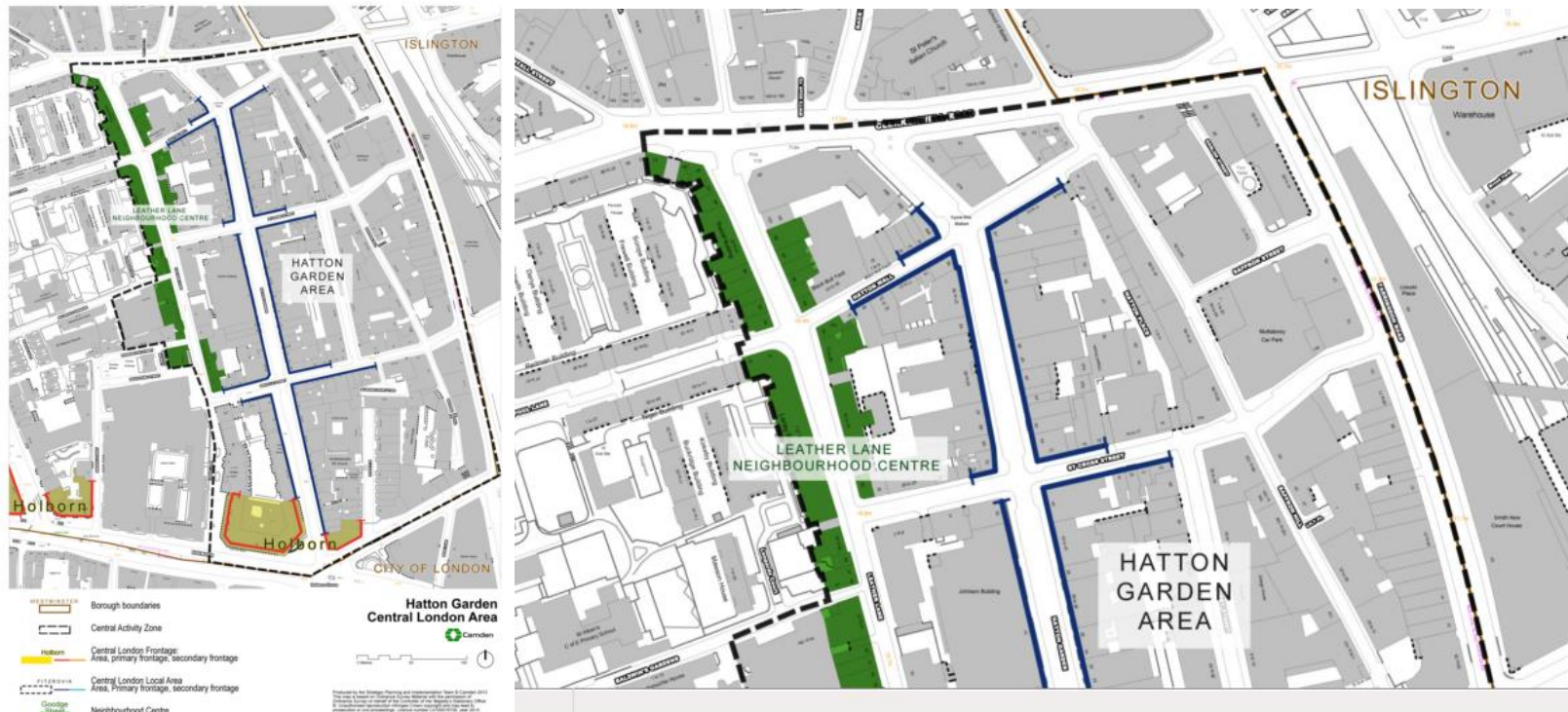


Image 32&33: Hatton Gardens Central London Area

## Conclusion

Camden has excellent transport connections, high quality places and high levels of accessibility, making it a suitable and attractive location for growth. However, there is limited land in Camden to accommodate this growth and so there is a need to use Camden's land more efficiently to ensure that it delivers the priorities set out within its Local Development Framework.

The site lies within a sustainable location consisting of predominantly residential buildings with retail and office space on the ground floor; hence the use of the first floor as residential units is considered to be in keeping with the established character of the area.

The quality of the residential accommodation and building will be enhanced by the proposed change of use and replacement of the atrium with the proposed new lowered roof with a box gutter and Velux window, as well as roof lights, which will have no detrimental effect on the character of the street environment or negatively impact on the surrounding area and/or the Hatton Gardens Conservation Area.

The existing store has excessive storage facilities situated on the ground floor at the rear as well as on the 1st floor and the proposal seeks to make more efficient use of the property through internal alterations to the unit's layout on the ground floor and conversion of the 1st floor to provide two new self-contained residential units. The upper floor is largely surplus to requirements and as such, the alternative use of the 1st floor is considered acceptable.

As there are environmental constraints in Hatton Garden due to its unique character and conservation area status, the amount of development taking place in this part of Farringdon/Smithfield is expected to be limited, hence small sites and development proposals are of great importance to ensure that development in the area is delivered.

This Statement has set out in detail the rationale for the proposal in the context of the current policies at all levels. The proposed development has given particular consideration to the National Planning Policy Framework (NPPF) and the Development Plan for the area, which comprises of Draft Camden Local Plan (2015), Camden Core Strategy (2010-2025) and Development Policies (2010-2025) together with associated Camden's Supplementary Planning Guidance.

It is considered that the proposed development is acceptable in principle and compliant with relevant policies. Furthermore, the proposed development and the proposed change of use is not prejudicial to the reasonable enjoyment of any of the neighbouring properties or detrimental to highway safety.

Housing is regarded as a priority land-use of the Local Development Framework, and the Council made housing provision its top priority when considering development proposals.

This planning application does not seek loss of A1 retail use, but to better utilise the existing floor space through minor internal alterations and by converting the existing shop unit into two smaller units, more suitable for the borough-wide and Hatton Gardens' specific requirements and in keeping with the character of the area, as well as to provide much needed residential accommodation. This will allow to optimise the potential the site offers.

The site meets Council's overall objective to create the conditions for growth to provide much needed homes, jobs and other facilities, while ensuring that this growth delivers, opportunities and benefits for Borough's residents and businesses. Growth should create the conditions for sustainable development and economic growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.