

February 2017

Planning, Design and Access Statement

16-18 Kirby Street – Fold 7



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1 Introduction

- 1.1 This Planning, Design and Access Statement has been prepared in support of a full planning application for the creation of a new staircase and enclosure at 16-18 Kirby Street, between the ground and first floor.
- 1.2 The new staircase will improve internal circulation, allowing staff and visitors to circulate between ground and first floor without having to use the staircase at the front of the building which is shared by other office occupiers in the building.
- 1.3 This Planning, Design and Access Statement is structured as follows:
 - Section 2 describes the site and its surroundings and relevant planning history;
 - Section 3 summarises the proposal;
 - Section 4 provides information on the design and access arrangements for the proposal;
 - Section 5 sets out relevant planning policy and other material considerations;
 - Section 6 explains the justification for planning permission; and,
 - Section 7 provides the conclusions.

Description of development

- 1.4 Full planning permission is sought for:
'Construction of staircase enclosure at first floor'.

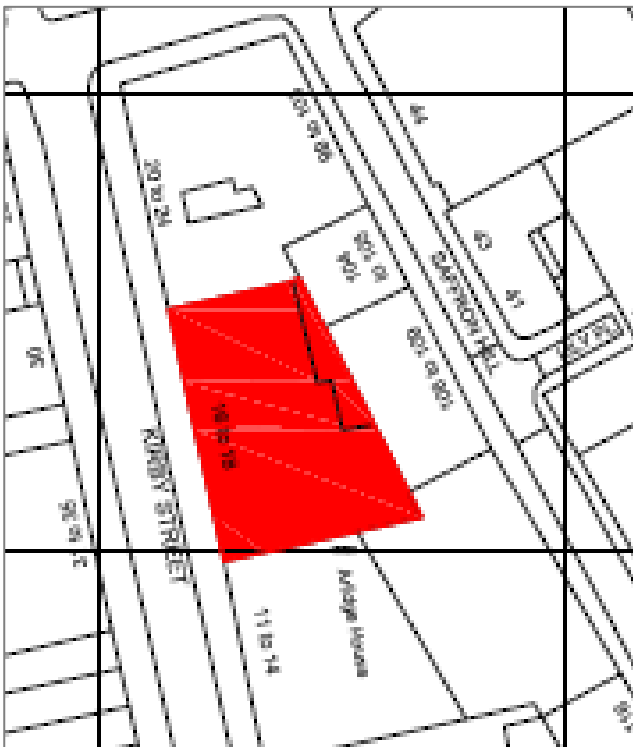


Figure 1.1: Location Plan

Source: Submitted drawing 607-00

Format of submission

1.5 In addition to this Planning, Design and Access Statement, this planning application comprises:

- Planning application fee of £195;
- Planning application form and ownership certificates;
- CIL form; and,
- Drawings including:
 - Location Plan and Block Plan (Drawing No. 607-00);
 - Existing Ground Floor Plan (Drawing No. 607-04);
 - Existing First Floor Plan (Drawing No. 607-01B);
 - Existing Sections (Drawing No. 607-03);
 - Proposed Ground Floor Plan (Drawing No. 607-05E);
 - Proposed First Floor Plan (Drawing No. 607-06L);
 - Proposed Sections (Drawing No. 607-11K); and,
 - Proposed Elevations (Drawing No. 607-12A).

2 The site and its surroundings

The Site

- 2.1 16-18 Kirby Street is an office building (Class B1a) located on the eastern site of Kirby Street, within the administrative boundary of the London Borough of Camden ('LBC'). The site forms part of a building originally numbered 15-19 Kirby Street.
- 2.2 The building sits on a 511sqm plot and consists of a basement, ground and five upper floors.
- 2.3 There is an existing terrace located at the rear of the first floor where the proposed staircase would be located. This terrace was created following planning permission ref: 2004/4109/P.
- 2.4 The site is located within the Hatton Garden Conservation Area.
- 2.5 The site is neither nationally nor locally listed.

Surroundings

- 2.6 The surrounding area is mixed in character and includes office accommodation, residential units and retail outlets.
- 2.7 Towards the northern reach of Kirby Street, buildings are predominately in residential and office use and range from 2 to 5 storeys. Opposite to the site is the Unite Students accommodation block, which comprises of six storeys.
- 2.8 Towards the southern reach of Kirby Street, ground floor retail units provide access to restaurant / café uses and diamond / jewellery outlets in association with the cluster of jewellery shops on Hatton Garden. The upper floors of these buildings largely consist of offices, with one residential block at the end of the street. These buildings are on average four storeys tall.
- 2.9 The urban grain in this location is very tight, and as such the rear of the site is located less than 10m from the rear of 104-105 Saffron Hill and 106/109 Saffron Hill. 104-105 Saffron Hill is currently in office use (Class B1) on ground and first floor and residential (Class C3) on second, third and fourth floor levels. 106-109 Saffron Hill is currently in office use on the basement, ground, first and second floor with residential use (Class C3) on third and fourth floor.

Planning History

- 2.10 A search of LBC's online planning register reveals a number of planning applications relating to the site. These are summarised in table 2.1 below.

Table 2.1 Site planning history

Application Number	Proposal	Decision	Decision Date
2016/4370/P	Creation on a roof terrace with associated privacy screen at 2n floor	Granted	03-10-2016
2015/6357/P	Creation of a terrace at 4 th floor level on existing flat roof structure to office	Granted	12-01-2016
2014/3494/P	Replacement of existing single entrance door with double doors	Granted	10-06-2014
2004/4109/P	Rear extensions at basement, ground, first floor levels, extension at roof level and the installation of a new front elevation to an existing office building (Class B1) together with installation of new plant to the rear	Granted	15-11-2004
8702033	The formation of a new entrance doorway	Granted	30-09-1987
9401475	Alterations to front elevation at ground floor level	Granted	04-11-1994
8501879	Installation of additional AC equipment to roof	Granted	04-11-1985
N16/12/C/12 232	The change of use from light industrial to offices	Granted	10-01-1972

3 The proposals

Proposal

- 3.1 It is proposed to construct a staircase enclosure at first floor level. The enclosure will be constructed on part of the existing first floor rear terrace. The approximate location of the proposed roof terrace is illustrated in figure 3.2 overleaf.
- 3.2 The proposed staircase will allow enhanced internal circulation, allowing direct access from the ground floor to the first floor, without staff or visitors having to enter the main circulation staircase at the front of the building.
- 3.3 The staircase will start within the ground floor of the building, extending up into the existing first floor terrace, where it will be enclosed with timber lightweight walls (with rendered external elevations to match existing) and a glass roof.
- 3.4 Access into the existing first floor from the new staircase will be via a newly constructed opening in the western elevation at first floor level. The staircase will not provide direct access onto the external terrace.

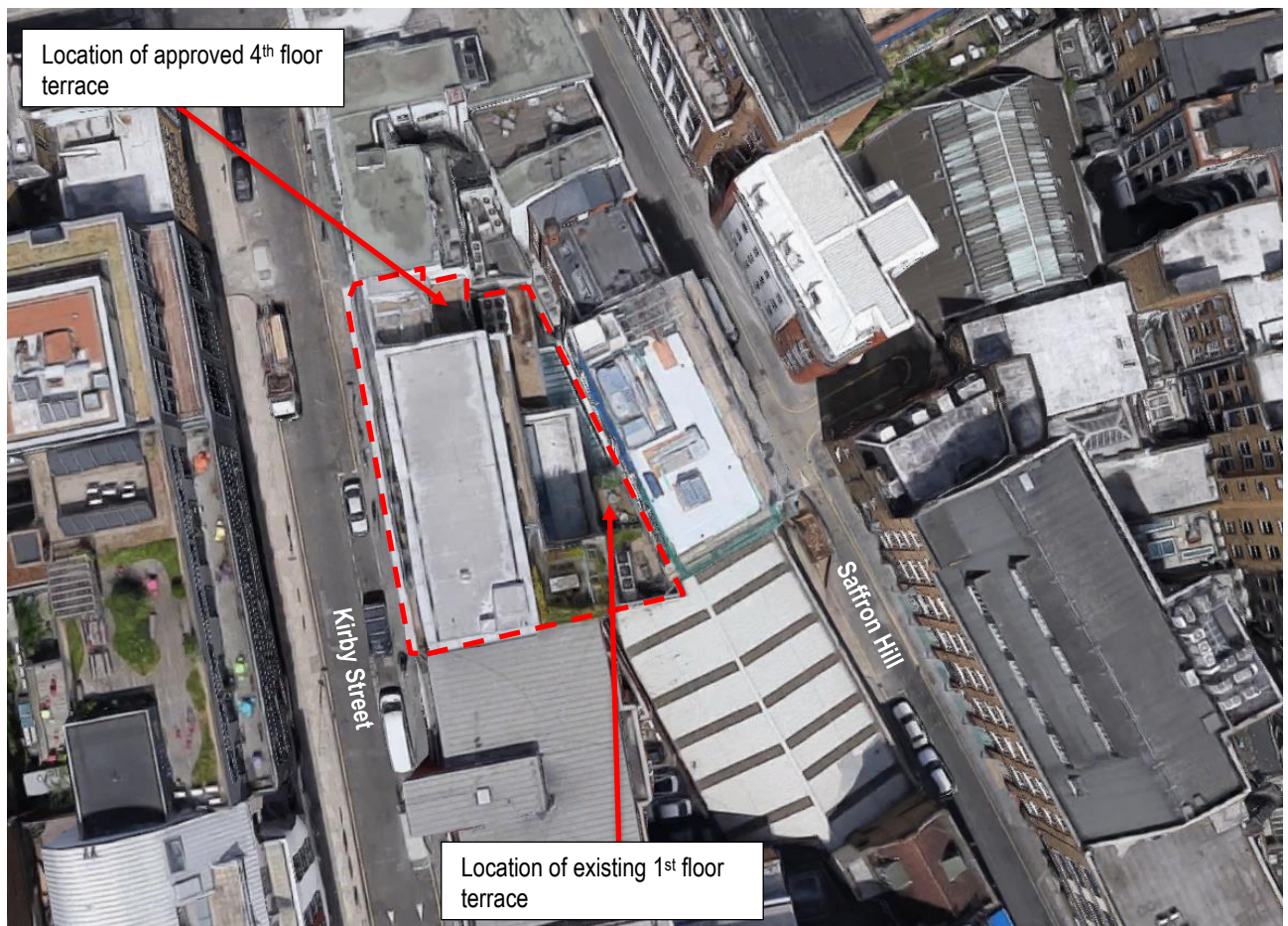


Figure 3.1: Site layout map

Source: Google Maps

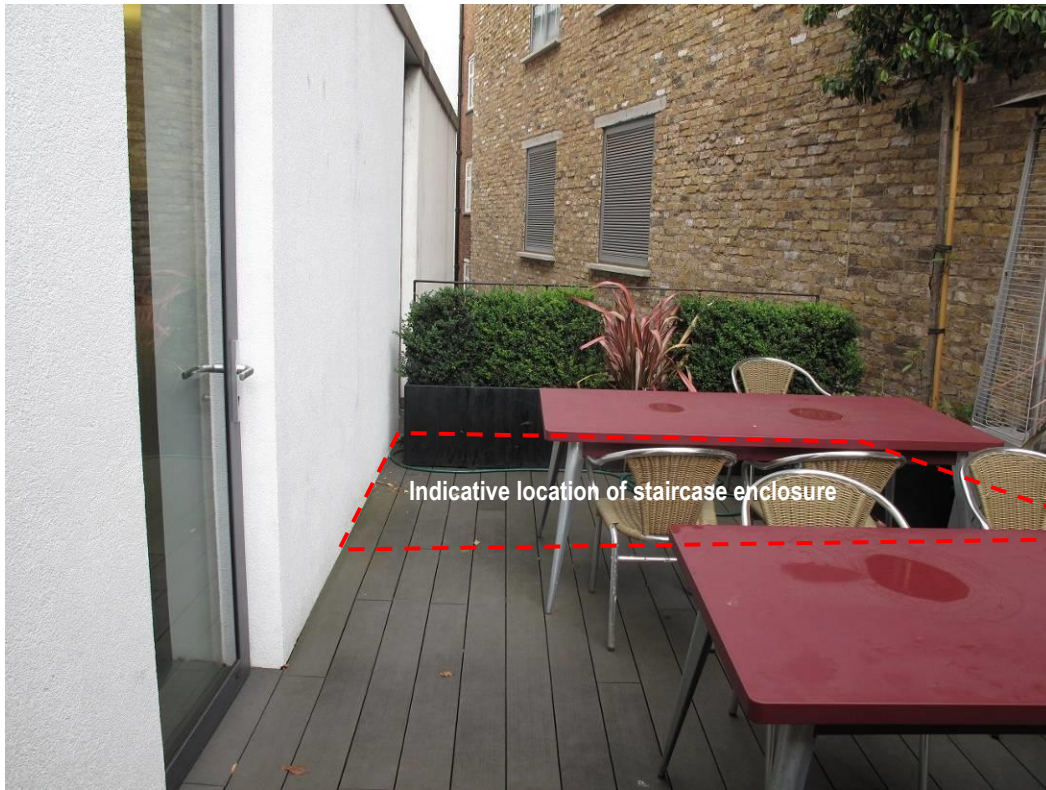


Figure 3.2: Existing first floor terrace. Indicative location of proposed staircase enclosure. See Drawing 607-06L for accurate location.

Source: Photograph by Fold 7.

4 Design and Access Statement

- 4.1 This section explains the design and access principles, and concepts of the proposed staircase enclosure at 16-18 Kirby Street.

Design

Area / floorspace

- 4.2 The site area extends to approximately 511sqm, comprising of an existing office building.
- 4.3 The proposed staircase enclosure will extend to 7.5sqm at first floor.

Layout / scale

- 4.4 The proposed staircase will connect the existing ground floor to the existing first floor. The staircase will be accommodated within the existing building at ground floor level, but will extend up onto the existing terrace at first floor level, as shown on drawing 607-06L. This will result in the loss of 7.5sqm of external terrace.

Landscaping

- 4.5 Given the very small scale nature of this proposal there is no landscaping proposed.

Appearance

- 4.6 The staircase enclosure will be constructed of lightweight timber walls at first floor level. The walls will be rendered on the external elevations to match that of the existing building, ensuring that the appearance of the enclosure matches that of the existing building.
- 4.7 The roof of the enclosure will be constructed of glass, matching the glass roof at ground floor level above the basement floor area.
- 4.8 No windows are proposed in the new enclosure.
- 4.9 No other external changes are proposed as part of these proposals.

Access

- 4.10 The staircase will be accessible from inside the existing ground floor and through a newly constructed opening in the east elevation at first floor.
- 4.11 There will be no access to the staircase or staircase enclosure from the existing first floor terrace.

5 Relevant planning policy

- 5.1 The application site is situated in an area under the administrative control of LBC.
- 5.2 Section 38(6) of the Planning & Compulsory Act 2004 states that applications must be determined in accordance with the relevant Development Plan unless material considerations indicate otherwise.
- 5.3 The statutory Development Plan relating to the site comprises:
- The London Plan (LP, March 2015);
 - LBC's Core Strategy (CS, 2010); and,
 - LBC's Development Policies (DP, 2010).
- 5.4 Regard should also be had to any relevant Supplementary Planning Documents and the Government's National Planning Policy Framework (NPPF, 2012).
- 5.5 The section below sets out policy designations relating to the site before reviewing adopted and emerging planning policy.

Site Designations

- 5.6 The site is designated on the LBC Policies Map, and falls within:
- Designated View (2A.1 Parliament Hill summit to St. Paul's Cathedral – Right Lateral Assessment Area);
 - Archaeological Priority Area (London Suburbs);
 - Central London Area (Clear Zone Region) CLA;
 - Conservation Area (Hatton Garden); and,
 - Hatton Garden Area.

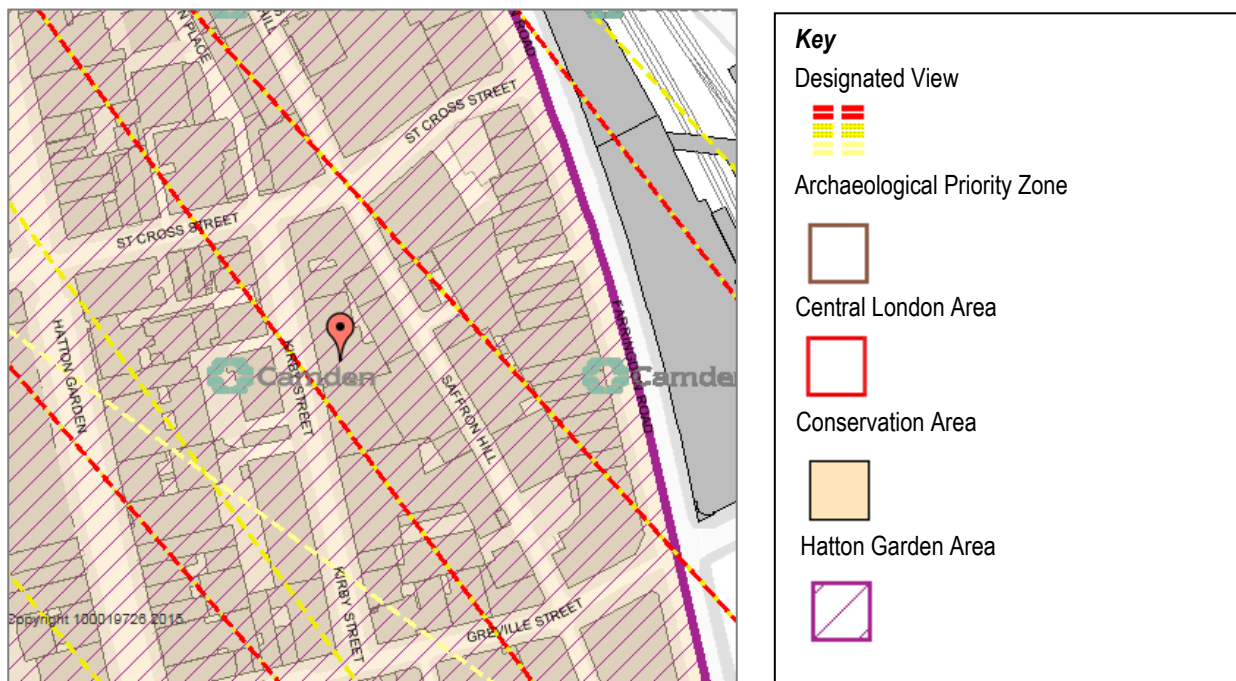


Figure 4.1: Extract from Policies Map

National planning guidance

National Planning Policy Framework (NPPF, March 2012)

- 5.7 The NPPF was adopted in March 2012 and is considered fundamental to Government Reforms to promote economic growth and make the planning system more accessible.
- 5.8 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (paragraph 14).

Design

- 5.9 In relation to design, paragraph 59 stipulates that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, massing, height, landscape, layout, materials and access. Para 60 further adds that “*planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles*”.

Heritage

- 5.10 The site falls within the Hatton Garden Conservation Area, a designated heritage asset. Paragraph 132 requires LPAs to apply “great weight” to conserving such assets. The more important the assets, the greater the weight should be.
- 5.11 Paragraph 132 notes that where a development proposal will lead to ‘less than substantial harm’ to the significance of a designated heritage assets, then “this harm should be weighed against the public benefits of the proposals, including securing its optimum viable use”.

Regional planning policy

London Plan (LP, March 2016)

- 5.12 The LP sets out the London Mayor’s strategic aspirations for development in London to 2031. Local Plan area expected to be in general conformity with these policies, which are by their very nature more generalised than those adopted by individual Borough’s like LBC.

Design

- 5.13 Policy 7.6 states that development proposals should not cause “unacceptable harm to the amenity of surrounding building, particularly residential buildings, in relating to privacy, overshadowing, wind and microclimate”. Proposals should also optimise the potential of sites.
- 5.14 Development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings (Policy 7.4). Furthermore, proposals should have regard to the pattern and grain of existing space and contribute to a positive relationship between urban structures.
- 5.15 Policy 7.2 expects development proposals to be of the highest standards of accessibility and include design which seeks to ensure that development can be used safely and easily by all.

Heritage

- 5.16 Policy 7.8 should “incorporate measures that ... protect and where appropriate, present’ London’s heritage assets. Development that affects heritage assets and their settings should conserve their significance by being ‘sympathetic to their form, scale, materials and architectural detail”.

Economy

- 5.17 Policy 4.2 recognises the importance of offices stating that management and mixed use development and redevelopment of offices provisions should be supported to improve London’s competitiveness. Additionally, the renewal and modernisation of existing office stock will be encouraged.

London View Management Framework

- 5.18 Policy 7.11 seeks to protect vistas towards strategically important landmarks by designating landmarks, viewing corridors and wider consultation areas. These elements together form protected vistas.
- 5.19 New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also “preserve or enhance viewer’s ability to recognise and to appreciate strategically important landmarks in these views”.

Local planning policy

LBC Core Strategy (CS, 2010)

- 5.20 The CS sets out the key elements of the LBC’s vision and helps it define and plan for the future by covering the physical elements of location and land use and addressing factors that make places ‘attractive, sustainable and successful’.

Amenity

- 5.21 Policy CS5 outlines how LBC will manage the impact of growth and development in the borough. LBC will protect the amenity of Camden’s residents and those working in and visiting the borough by:
- *“Making sure that the impact of developments on their occupiers and neighbours is fully considered;*
 - *Seeking to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities; and*
 - *Requiring mitigation measures where necessary”.*
- 5.22 Supporting paragraphs 5.7 and 5.8 outline the importance of protecting amenity through successfully managing growth in Camden. LBC will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

Design

- 5.23 Policy CS14 seeks to promote high quality places by ensuring that places and buildings are attractive, safe and easy to use. Developments need to be of the highest standard of design that respects local context and character.
- 5.24 Supporting paragraph 14.4 further highlights the importance of design by stating that “development schemes should improve the quality of buildings, landscaping and the street environment and through this, improve the experience of the borough for residents and visitors”. LBC will not accept design that is considered inappropriate to its context or which fails to take opportunities to improve the character and quality of an area and the way it functions.
- 5.25 Supporting paragraph 14.18 emphasises the importance of high quality landscaping. LBC will expect development schemes to provide a high standard of landscaping and boundary features such as walls and fences. The appropriate use of landscaping such as ‘green roofs’, ‘brown roofs’ and ‘green walls’ are encouraged.

Heritage and Views

- 5.26 In addition to promoting good design, Policy CS14 seeks to preserve and enhance LBC’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens.

- 5.27 The important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside LBC, and important local views will be protected.
- 5.28 Supporting paragraph 14.25 seeks to ensure that development is compatible with such views in terms of setting, scale and massing and will resist proposals that we consider would cause harm to them. Development will not generally be acceptable if it obstructs important views or skylines, appears too close or too high in relation to a landmark or impairs outlines that form part of the view.

Economy

- 5.29 Policy CS8 promotes a successive and inclusive Camden economy. This includes providing a range of employment premises, protecting existing employment sites, as well as providing innovative new employment floorspace in developments.
- 5.30 LBC Development Policies (DP, 2010)
- 5.31 The DP sets out the detailed planning criteria used to determine application for planning permission in LBC.

Design

- 5.32 Policy DP22 promotes sustainable design and construction measures including incorporating green or brown roofs and green walls wherever suitable.
- 5.33 Policy DP24 expects all developments to be of the highest standard of design and to consider: the character, setting, context and the form and scale of neighbouring buildings.

Heritage

- 5.34 Policy DP25 seeks to maintain the character of LBC's conservation areas. As such, DP25 will "only permit development within conservation areas that preserves and enhances the character and appearance of the area".

Amenity

- 5.35 Policy DP26 seeks to protect and quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Factors considered under this policy include: visual privacy and overlooking; overshadowing and outlook' sunlight, daylight and artificial light levels; noise and vibration levels; odours, fumes and dust' microclimate; and, the inclusion of appropriate attenuation measures.
- 5.36 Supporting paragraph 16.3 reinstates the importance of amenity that can be influenced by its design and layout, the distance between properties, the vertical levels of onlookers and occupiers and the angle of views. LBC will expect that these elements are considered at a design stage of a scheme to prevent potential negative impacts of the development on occupiers and neighbours.

Emerging Planning Policy

Camden Local Plan (Submission Draft 2016)

- 5.37 On 24 June 2016 the Council submitted the Camden Local Plan and supporting documents to the Secretary of State for independent examination. Given the advance stage of production of this Local Plan, it is considered that its policies carry some weight for the purposes of decision taking.

Design

5.38 Policy D1 (Design) seeks to secure high quality design in development. As part of this the Council requires that development:

- Respect local context and character;
- Preserves and/or enhances the historic environment and heritage assets;
- Is sustainable in design and construction;
- Integrates well with the surrounding streets and open space; and,
- Comprises details and materials that are of high quality and complement the local character.

Heritage

5.39 Policy D2 (Heritage) will not permit the loss of or substantial harm to a designated heritage asset (including Conservation Areas and Listed Buildings) unless it can be demonstrate that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh harm or loss. Further, within conservation areas, the Council will “*require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area*”.

Amenity

5.40 Policy A1 (Managing the impact of development) seeks to ensure that the amenity of neighbours, occupiers and communities is protect. Factors considered include visual privacy, outlook, sunlight, daylight and overshadowing, artificial lighting level and impacts of the construction phase.

Other material considerations

London View Management Framework SPG (LVMF, 2012)

- 5.41 The LVMF provides the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.
- 5.42 A planning application for a proposal that could affect a Designated View should be accompanied by an analysis that explains, evaluates and justified any visual impact on the view. The analysis should consider the likely significant, scale and magnitude of the effect causes by the proposal’s size, shape or design with reference to the London Plan.
- 5.43 The site falls within the designated Parliament Hill London Panorama. There are a number of outlooks on the hill, but “some of the best panoramic views are from the summit, towards the City of London, St Paul’s Cathedral and the Victoria Tower of the Palace of Westminster”.

Camden Planning Guidance CPG 1 (Design)

Heritage

5.44 Chapter 3 provides guidance on identified heritage assets, which include conservation areas. Paragraph 3.7 states that LBC will only permit development within conservation areas that preserves and enhances the character and appearance of the area.

Design

5.45 Chapter 5 provides advice on roof alterations and on proposals for balconies and terraces. LBC will seeks to ensure that roof alterations are sympathetic and do not harm the character and appearance of the buildings or the wider townscape in the borough.

- 5.46 Paragraph 5.24 states that balconies and terraces should form an “integral element in the design of elevations. The key to whether a design is acceptable is the degree to which the balcony or terrace complements the elevation upon which it is to be located”. Consideration will be given to the following aspects:
- Detailed design to reduce the impact on the existing elevation;
 - Careful choice of materials and colour to match the existing elevation;
 - Possible use of setbacks to minimise overlooking – a balcony need not necessarily cover the entire available roof space;
 - Possible use of screens or planting to prevent overlooking of habitable rooms or nearby gardens, without reducing daylight and sunlight or outlook; and
 - Need to avoid creating climbing opportunities for burglars.
- 5.47 A terrace provided at roof level should “be set back behind the slope of a pitched roof... or behind a parapet on a flat roof”. A terrace should normally comply with the following criteria:
- The dimensions of the roof should be sufficient to accommodate a terrace without adversely affecting the appearance of the roof or the elevation of the property.
 - A terrace will only normally be acceptable on the rear of properties. It is normally inappropriate to set back a mansard roof to provide a terrace.
 - Any handrails required should be well set back behind the line of the roof slope, and be invisible from the ground.
 - It should not result in overlooking of habitable rooms of adjacent properties.

Camden Planning Guidance CPG 6 (Amenity)

Overlooking and privacy

- 5.48 Chapter 7 seeks to protect the privacy of existing dwellings and to secure mitigation measures where overlooking is unavoidable.
- 5.49 Development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. New roof terraces should be carefully designed to avoid overlooking. To ensure privacy, there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. The minimum requirement will be the distance between the two closest points on each buildings (including balconies).
- 5.50 Where this standard cannot be met, LBC may require applicants to incorporate some of the following design measures into the scheme to ensure overlooking is reduced to an acceptable level. Design measures to reduce the potential for overlooking and the loss of privacy include:
- Use of obscure glazing;
 - Screening by walls or fencing; and,
 - Screening by other structures or landscaping.
- 5.51 Where landscaping is used as a method of screening, arrangements for ongoing maintenance should be put in place and this may be secured by a planning condition.

6 Justification for planning permission

6.1 This section considers the key issues relating to the proposals in the context of relevant national, regional and local planning policy, as well as material considerations.

6.2 The following issues are key to the application and are considered in turn below:

- The design of the enclosure;
- The impact on residential privacy / overlooking;
- The impact on designated heritage assets;
- The impact on designated views.

The design of the enclosure

6.3 Planning policies expect extensions to be of a high quality and to respect the local context and character.

6.4 The existing building is of no particular architectural merit and the design will only involve a slight change to the rear of the property.

6.5 In designing the proposed staircase enclosure, consideration has been given to the choice of proposed materials and colours. The walls will be constructed of lightweight timber, but rendered to match the existing building. This will ensure that the enclosure will complement the character of the area and the neighbouring properties. Further, the proposed glass roof will match the existing glass roof over the ground floor/basement void of the building.

6.6 The enclosure is very small in scale (7.5sqm) and will not appear incongruous in the local context.

6.7 The proposal is, therefore, in accordance with policies DP22, CS14, D1 and paragraph 5.24 of CPG 1.

The impact of residential privacy and overlooking

6.8 The proposed enclosure directly fronts 106-109 Saffron Hill and 104-105 Saffron Hill. There is already a large degree of mutual overlooking between the existing residential windows and the first floor terrace, where the staircase enclosure is proposed. Therefore, it is not considered that the construction of enclosure will unduly increase overlooking and loss of privacy to residential occupants.

6.9 The proposal will have negligible impact on the privacy of neighbouring buildings in accordance with policy DP23, CS supporting paragraphs 5.7 and 5.8 and the requirements of CPG 6.

The impact on designated heritage assets

6.10 The site falls within the Hatton Garden Conservation Area, a designated heritage asset. The building is neither nationally nor locally listed. None of the neighbouring buildings on Kirby Street or Saffron Hill are nationally or locally listed.

6.11 The proposal will only affect the appearance a small section of the rear elevation of the building, which cannot be seen from Kirby Street, Saffron Hill, St Cross Street or Greville St, as the buildings are arranged as a 'perimeter block' which prevents views to the rear façade of the building.

- 6.12 There will not, therefore, be any harmful impact on the Hatton Garden Conservation Area.
- 6.13 Given the above, it is considered that the proposed terrace adheres to local policies CS14 and DP25, and the requirements of CPG1.

The impact on designated views

- 6.14 The site falls within the designated panorama of Parliament Hill (2A.1).
- 6.15 The proposal relates to the 1st floor. No element of the proposal will protrude above the height of the existing building, nor will it protrude above the height of the neighbouring buildings. Therefore the proposal will not impact the designated London Panorama.
- 6.16 The proposal is therefore in accordance with LBC policy CS14 and the London View Management Framework SPG.

7 Conclusions

- 7.1 This planning application proposes the creation of a staircase enclosure at first floor level, in order to improve internal circulation between the ground and first floor level of this building.
- 7.2 The proposed design is sympathetic to the appearance and character of the area, and will utilise materials that match the existing building. As it is to the rear of the site, the proposal will have no impact on Hatton Gardens Conservation Area or neighbouring residential properties.
- 7.3 It is our view that the application accords with relevant national, regional and local planning policies and that it is appropriate to grant planning permission.



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