

Planning statement

3-5 Kirby Street, London
Belmont Jewellery Company Ltd

27 March 2017

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Summary

1. This statement accompanies a detailed planning application, submitted on behalf of Belmont Jewellery Company Ltd, for the following proposed development at 3-5 Kirby Street, London EC1N 8TS:

“Combine the two buildings at 3-5 Kirby Street, refurbish both interiors to achieve modern standards; extensions to both the roof and the rear to accommodate office, workshop and retail space.”
2. The site is located within Hatton Garden Conservation Area under 250m from Farringdon station. The site is currently in use as office space and jewellery workshops with retail units located at ground floor level.
3. The proposed development will lead to an increase in office floor space of 302 sq. m through revisions to the layout and the provision of rear and roof level extensions. The existing level of jewellery workshop space will be retained and increased by 3 sq. m. The retail floor space will decrease by 42 sq. m.
4. The design approach has considered and responded to the sensitive historic context in order to provide a high quality development that will preserve and enhance the character and appearance of the conservation area.
5. The proposed development accords with adopted local planning policy and will bring the following benefits:
 - Delivery of 302 sq. m of additional high quality office floor space in a highly accessible Central London location;
 - Retention of existing jewellery workshop space on site and improved quality of this space;
 - Rationalisation of the internal layout of the buildings and efficient use of the land available on the site;
 - Improving the existing office facilities to bring them up to modern standards and improving accessibility; and
 - Adding design interest to an unlisted building within the conservation area.

1. Introduction

- 1.1. This planning statement, prepared by Maddox Associates, considers the planning policy framework that supports a full planning application to the London Borough of Camden on behalf of our client, Belmont Jewellery Co. Ltd, at 3-5 Kirby Street, London EC1N 8TS.

The proposal

- 1.2. The full planning application proposes combination of two buildings, together with extensions to the roof and at the rear. As part of the development, a series of refurbishment works will also be undertaken to both interiors. The development will accommodate office, workshop and retail floor space. The proposed description of development is:

“Combine the two buildings at 3-5 Kirby Street; refurbish both interiors to achieve modern standards; extensions to both the roof and the rear to accommodate office, workshop and retail space.”

The application

- 1.3. This statement has been informed by a comprehensive set of planning application documents and plans, as set out below. The statement should therefore be read in conjunction with these submission documents, which will provide further information on the points summarised and assessed against planning policy in this report.
- Application plans and drawings;
 - Daylight and sunlight assessment;
 - Design and access statement;
 - Energy statement (within the design and access statement);
 - Plant noise assessment; and
 - Planning application form and certificates.

Environmental impact assessment

- 1.4. Given the nature of the development proposals, it is necessary to consider the proposals against the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).
- 1.5. The proposals comprise combination of two buildings, refurbishment and extension works. The proposals fall below the thresholds set out in column 2 of Schedule 2 of the EIA Regulations for urban development projects. It is therefore considered that the proposed development is unlikely to have significant environmental effects and does not comprise “EIA development.” The submitted environmental reports will ensure that environmental issues are assessed as part of the application process.

Key benefits

- 1.6. The application delivers a series of key benefits, including:
- Increase in high quality office floor space;
 - Retention of workshop floor space and improvement to its quality; and

- Refurbishment of the buildings to bring them up to modern standards.

Pre-application advice

- 1.7. Pre-application advice was received from the London Borough of Camden, dated 17 October 2016 and 1 March 2017. The pre-application advice considered that the principle of combining the two buildings to improve the existing retail, office and workshop space, with extensions at roof level and the rear, would be broadly acceptable. However, the increase in floor space would be contrary to policy unless workshop space is retained. The advice considered that the improvement of existing and introduction of additional B1a office space would be acceptable. The retention of retail space was welcomed and the slight reduction was considered to be acceptable in this instance, given the potential improvements to the building. Concerns were raised about the design of the windows and shop fronts and about the scale and level of setback of the roof extension. However, the design inspiration from the Hatton Garden jewellery quarter in terms of materiality of the roof extension was welcomed and the infill extension to the rear was considered to be likely to be acceptable.
- 1.8. The pre-application advice has been fully considered and the proposed design has evolved accordingly. The remainder of this statement is structured as follows:
 - Section 2 examines the sites and its surroundings;
 - Section 3 provides details of relevant legislation and guidance;
 - Section 4 sets out the relevant development plan policies against which the proposals should be assessed and other material considerations;
 - Section 5 examines the relevant planning history relating to the site;
 - Section 6 provides details of the proposed development;
 - Section 7 provides an assessment of the proposal against the relevant planning policies and material considerations; and
 - Section 8 concludes that planning permission should be granted in the light of the foregoing.

2. Site and area description

- 2.1. The 0.02 ha site is located at 3-5 Kirby Street, London EC1N 8TS. The plan below shows the application site shaded in blue.

Figure 1: Application Site



- 2.2. The site comprises two existing properties: 3-4 Kirby Street and 5 Kirby Street.
- 2.3. The site is in use as existing office buildings and jewellery workshops with retail units located at ground floor level. The existing buildings are not listed and are four storeys in height. There are no trees located on the site.
- 2.4. The site is accessed from Kirby Street and is located under 250m from Farringdon station. The site has a PTAL rating of 6b. There are numerous bus stops and cycle hire stands nearby.
- 2.5. The site is located within the Hatton Garden Conservation Area and within an Archaeological Priority Zone. The site falls within a strategic viewing corridor: view 2A.1 from Parliament Hill to St Paul's Cathedral and view 3A.1 from Kenwood: viewing gazebo to St Paul's Cathedral. The site also lies within the designated Central London Area (Clear Zone Region) and Central London Local Area Hatton Garden. The site lies within Environment Agency Flood Zone 1 and is also not identified as an area at risk of surface water flooding according to the Council's Strategic Flood Risk Assessment (2014).

- 2.6. There is a mix of uses in the surrounding area including offices, workshop space, retail and residential uses. Building heights in the area range from four to six storeys in height. As noted in the submitted design and access statement, the street is now dominated by several large modern buildings in different design styles and clad with modern materials, creating a distinctive sub-context within the wider conservation area. All modern buildings on both sides of Kirby Street set back on their front elevations from 4th or 5th floor onward, establishing a datum along the street at the height of the existing building of 3-5 Kirby Street. Further analysis is set out in the accompanying design and access statement.
- 2.7. The site is located in a controlled parking zone.

3. Legislation and guidance

- 3.1. To the extent that development plan policies are material to an application for planning permission, the decisions for applications must be taken in accordance with the development plan, unless there are material considerations that indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 3.2. Section 72 of the Planning (Listed Buildings and Conservations Area) Act 1990 requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of their planning functions.

National planning policy framework

- 3.3. The National Planning Policy Framework ('the Framework') was published on 27 March 2012 and sets out the Government's planning policies for England and how these are expected to be applied. The National Planning Policy Framework stresses the importance of having a planning system that is genuinely plan-led. Where a proposal accords with an up-to-date development plan it should be approved without delay, as required by the presumption in favour of sustainable development at paragraph 14 of the National Planning Policy Framework.
- 3.4. Where the development is absent, silent or the relevant policies are out of date, paragraph 14 of the National Planning Policy Framework requires the application to be determined in accordance with the presumption in favour of sustainable development unless otherwise specified.
- 3.5. Those policies considered to be most relevant to the proposed development are set out below:
 - Chapter 1 – Building a strong, competitive economy;
 - Chapter 7 – Requiring good design; and
 - Chapter 12 – Conserving and enhancing the historic environment.

Planning practice guidance

- 3.6. The Government's online Planning Practice Guidance is intended to assist practitioners in the interpretation of planning legislation. Those paragraphs relevant to this application are noted below.
 - Paragraph 001 (Reference ID: 26-001-20140306) sets out that achieving good design is about creating places, buildings or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Further, good design responds in a practical and creative way to both the function and identity of a place.
 - Paragraph 029 (Reference ID: 26-029-20140306) recognises the processes and tools that can be used to help achieve good design, including (amongst other things) pre-application discussions and design and access statements.

4. Development plan policy

4.1. The adopted development plan for the site comprises:

- The London Plan (March 2016);
- Camden Core Strategy (2010); and
- Camden Development Policies (2010).

Camden Core Strategy (2010)

4.2. The following Core Strategy policies are considered to be of relevance to the planning application:

- CS1 – Distribution of growth;
- CS3 – Other highly accessible areas;
- CS5 – Managing the impact of growth and development;
- CS8 – Promoting a successful and inclusive Camden economy;
- CS9 – Achieving a successful Central London; and
- CS14 – Promoting high quality places and conserving our heritage.

4.3. CS1 aims to ensure that growth is focussed in the most sustainable locations, and managed to make that its opportunities and benefits are delivered and achieve sustainable development. This includes the aim of promoting the most efficient use of land and buildings in Camden by:

- 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;
- Resisting development that makes inefficient use of Camden's limited land; and
- Expecting high density development in Central London, town centres and other locations well served by public transport.

4.4. Through policy CS3, the Council promotes appropriate development in highly accessible locations, including Central London, which is considered to be a suitable location for the provision of shops, food, drink and entertainment uses and offices amongst other uses. The Council will aim to ensure that development in these locations is suitable in scale and character for the area.

4.5. CS5 notes that the Council will manage the impact of growth and development in Camden, with particular consideration given to:

- a) Providing uses that meet the needs of Camden's population and contribute to the borough's London-wide role;
- b) Providing the infrastructure and facilities needed to support Camden's population and those who work in and visit the borough;
- c) Providing sustainable buildings and spaces of the highest quality; and
- d) Protecting and enhancing the environment and heritage and the amenity and quality of life of local communities.

4.6. CS5 also states that the Council will protect the amenity of Camden's residents and those working in and visiting the borough by:

- e) Making sure that the impact of developments on their occupiers and neighbours is fully considered;
 - f) Seeking to ensure development contributes towards strong and successful communities by balancing the needs and characteristics of local areas and communities; and
 - g) Requiring mitigation measures where necessary.
- 4.7. CS8 seeks to promote a successful and inclusive economy in Camden. The Council will:
- Support Camden's industries by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers; and promoting and protecting the jewellery industry in Hatton Garden;
 - Recognise and encourage concentrations of creative and cultural businesses; and
 - Recognise the importance of other employment generating uses, including retail, markets, leisure etc.
- 4.8. CS9 seeks to achieve a successful Central London through supporting Central London as a focus for Camden's future growth in homes, offices, shops, hotels and other uses. It also seeks to promote and protect areas of specialist activity, such as the Museum Street area and Hatton Garden; and continues to designate Central London as a Clear Zone Region to reduce congestion, promote walking and cycling and improve air quality.
- 4.9. CS14 seeks to ensure that Camden's places and buildings are attractive, safe and easy to use by:
- a) Requiring development of the highest standard of design that respects local context and character;
 - b) Preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
 - c) Promoting high quality landscaping and works to streets and public spaces;
 - d) Seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible; and
 - e) Protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting local views.

Camden Development Policies (2010)

- 4.10. The following development policies are considered to be of relevance to the application:
- DP1 – Mixed use development;
 - DP13 – Employment sites and premises;
 - DP22 – Promoting sustainable design and construction;
 - DP24 – Securing high quality design;
 - DP25 – Conserving Camden's heritage; and
 - DP26 – Managing the impact of development on occupiers and neighbours.
- 4.11. Policy DP1 seeks to provide a mix of uses within developments in order to facilitate sustainable development and reduce the need to travel between homes, services and

jobs. The policy sets out that, in the Central London Area, where a proposal would result in an increase in floor space of more than 200 sq. m, a contribution to the supply of housing is expected, equating to up to 50% of the additional floor space. However, there is an exception in the Hatton Garden area, where the Council requires up to 50% of all additional floor space to be in the form of secondary uses, including a contribution to housing and a contribution to affordable premises suitable for the jewellery industry.

- 4.12. It further states that the Council will require any secondary uses to be provided on site, particularly where 1, 000 sq. m (gross) of additional floor space or more is proposed. In considering whether a mix of uses should be sought, whether it can be practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:
- a) The character of the development, the site and the area;
 - b) Site size, the extent of the additional floor space, and constraints on including a mix of uses;
 - c) The need for an active street frontage and natural surveillance;
 - d) The economics and financial viability of the development including any particular costs associated with it;
 - e) Whether the sole or primary use proposed is housing;
 - f) Whether an extension to the gross floor space is needed for an existing user;
 - g) Whether the development is publicly funded; and
 - h) Any other planning objectives considered to be a priority for the site.
- 4.13. Policy DP13 seeks to retain land and buildings that are suitable for continued business use. Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:
- The level of employment floor space is maintained or increased;
 - Premises suitable for new, small or medium enterprises are provided;
 - Floor space suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses.
- 4.14. DP22 refers to sustainable design and construction. Schemes must demonstrate how sustainable development principles have been incorporated into the design and proposed implementation; and should incorporate green or brown roofs and green walls wherever suitable.
- 4.15. Policy DP24 refers to securing high quality design. The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design.
- 4.16. DP25 seeks to maintain the character of Camden's conservation areas and will only permit development within conservation areas that preserves and enhances the character and appearance of the area.
- 4.17. DP26 seeks to manage the impact of development on occupiers and neighbours. Permission will only be granted for development that does not cause harm to amenity. Factors that the Council will consider include visual privacy and overlooking; overshadowing and outlook; sunlight, daylight and artificial light levels.

Supplementary Planning Guidance/ Documents

4.18. Relevant supplementary planning guidance documents include the following:

Mayoral SPG

- Character and Context (2014);
- Sustainable Design and Construction (2014); and
- London View Management Framework (2012).

Camden's SPG

- CPG1 Design;
- CPG3 Sustainability;
- CPG5 Town centres, retail and employment;
- CPG6 Amenity; and
- CPG8 Planning obligations.

4.19. The Hatton Garden Conservation Area Statement is also of relevance to the proposal. The statement provides an overview of the character of the area, as well as providing guidelines for development in the area.

Other Material Considerations

- 4.20. The emerging local plan is at an advanced stage, having progressed to examination stage. Consultation on proposed modifications took place until 13 March 2017. Emerging policies therefore have some weight in decision-making.
- 4.21. Camden's Community Infrastructure (CIL) charging schedule came into effect on 1 April 2015. There is a levy of £45 per sq. m net additional office space (GIA) in Zone A (central). In addition, the proposed development would be liable to mayoral CIL at a rate of £50 per sq. m net additional floor space.

5. Relevant planning decisions

- 5.1. There are no relevant on-site planning decisions.
- 5.2. Relevant off-site planning decisions are shown in the following table.

Table 1: Off-Site Planning Decisions

Application Reference and Site	Description of Development	Decision	Date of Decision
2016/4370/P 16 Kirby Street	Creation of a roof terrace with associated glazed privacy screen and access door on the existing rear 2nd floor flat roof.	Granted.	03.10.16
2015/5707/P Saffron House, 6-10 Kirby Street	External alterations to the existing offices (Class B1) including infilling the external front balconies at first and second floor level, enlargement of the window openings at third floor level, relocation of the ground floor front entrance, and installation of new ground floor canopy.	Granted.	26.02.16
2012/4290/P 84 Hatton Garden, London EC1N 8JR	Change of use of first, second, third, fourth and fifth floors from vacant jewellery workshops (Class B1c) to create 5 self-contained 2-bedroom flats (Class C3) plus relocation of roof level staircase hatch.	Allowed on appeal (ref: APP/X5210/A/13/2196094).	26.09.13
2011/1411/P Gretton House, 28-30 Kirby Street	Alterations and additions in association with the change of use from office use (Class B1) at 5th and 6th floor levels to provide 5 (1x1-bed & 4x2-bed) residential units (Class C3) and additional office (Class B1) accommodation, including extension/realignment works to rear at 2nd and	Granted.	28.10.11

	3rd floor levels, extension to rear at 4th and 5th floors, extension at 6th floor level, provision of terraced areas at 1st, 4th, 5th and 6th floor levels, alterations to ground floor entrance, recladding of exterior of building and associated alterations.		
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6. The proposed development

- 6.1. The application is for full planning permission for the combination of two buildings (no. 3-4 Kirby Street and no. 5 Kirby Street) together with extensions to the roof and at the rear. As part of the development, a series of refurbishment works will also be undertaken to both interiors. The submitted design and access statement provides a detailed overview of the proposed development. The paragraphs below provide a summary of the design and layout principles and should be read in conjunction with the submitted design and access statement.

Land use

- 6.2. The existing building is in use as office and jewellery workshop space (Use Class B1) with A1 retail/ A3 café floor space at ground floor level. The proposal will lead to an increase in office floor space of 302 sq. m through revisions to the layout and the provision of extensions to the rear and at roof level. The proposals will result in an increase in jewellery workshop space of 3 sq. m and a decrease in retail/ café space of 42 sq. m.

Layout

- 6.3. The proposals will combine no. 3-4 Kirby Street and no. 5 Kirby Street and will reconfigure the internal area to improve efficiency of the building and to generate larger floor plates designed to meet modern business needs. The jewellery workshop space will be consolidated at basement level and the proposed extensions will provide additional office space to the rear and at fourth and fifth floor levels. A summary of the proposed floor space is provided below.

Table 2: Floor Space Schedule

Level	Use	Existing Floor Space (sq. m NIA)	Proposed Floor Space (sq. m NIA)
Basement	Office	14	0
	Jewellery workshop	62	174
	Retail/ café	41	0
	Other	48	10
Ground Floor	Office	15	0
	Jewellery workshop	18	0
	Retail/ café	94	93
	Other	2	65
First Floor	Office	92	149
	Jewellery workshop	22	0
	Retail/ café	0	0
	Other	0	0
Second Floor	Office	79	139
	Jewellery workshop	35	0
	Retail/ café	0	0
	Other	2	0
Third Floor	Office	76	126
	Jewellery workshop	34	0
	Retail/ café	0	0
	Other	11	0

Fourth Floor	Office	0	100
	Jewellery workshop	0	0
	Retail/ café	0	0
	Other	0	0
Fifth Floor	Office	0	64
	Jewellery workshop	0	0
	Retail/ café	0	0
	Other	0	0

Scale, massing and appearance

- 6.4. The proposals include a roof extension of two storeys with a stepped elevation to address comments made at pre-application stage. The design draws inspiration from the historic background to the site and seeks to make reference to diamond cutting. The fourth floor extension “cut line” matches the elevation lines of its immediate neighbours. The fifth storey element is “cut” such that it will be barely visible from street level. An additional “diamond cut” has been introduced such that the façade fins taper towards the dividing line between the two buildings. Delicate metal railings in the same finish as the façade provide fall protection and give additional layering and depth when viewed from the street. The roof plant is positioned at the rear of the building so that it will not be visible from the street. It has a simple white render finish to reduce visual impact when viewed from neighbouring properties, in keeping with other roof plant screens in the area.
- 6.5. A rear extension is also proposed to provide additional B1 office space. The rear elevation is not visible from any public street or highway but does face onto a private courtyard.
- 6.6. In terms of appearance, single glazed windows and shop fronts will be replaced. Existing bricks will be cleaned and repaired. The proposed façade detailing has been revised to address pre-application comments received as follows:
- An increased metal element to the rooftop extension with reddish brown metal finish façade system referencing Hatton Garden jewellery heritage and existing building colour.
 - Restoration of the sense of urban grain in the rooftop extension through denser glazing mullions on 5 Kirby Street side.
 - Increased subdivision of replacement windows in line with the existing.
 - A greater metal element to the shop front design.
- 6.7. The proposed elevation and views from Greville Street and Kirby Street are shown in 6.1 to 6.3 of the accompanying design and access statement.

Access

- 6.8. The building would continue to be accessed from Kirby Street. Two entrances are provided to the ground floor retail space. The shopfront openings have been aligned with the façade lines above. An office reception entrance for the upper floors and separate access to the lower ground floor workshop are also provided. Improved access arrangements for disabled persons are proposed as part of the refurbishment works including installation of a new lift.

Cycle parking and facilities

- 6.9. The proposals will include 8 long stay cycle parking spaces at ground floor level accessed via the office reception entrance. Due to the constrained nature of the existing building and the requirement to accommodate multiple uses on site, it has not been possible to provide separate cycle parking for short stay users. It is proposed that a contribution will be provided for short stay cycle parking stands to be located on the street.

7. Key issues and considerations

- 7.1. As noted above, this section provides an assessment of the proposal against a series of considerations, drawing on the conclusions of the submitted supporting reports.

Principle of development

- 7.2. The site is currently in use as offices, workshop space and retail space. The proposal seeks to combine two buildings, retain the workshop space and deliver 302 sq. m of additional high quality office floor space in a highly accessible central location, making efficient use of the site. In addition, the proposal will make improvements to the internal configuration of the building and will provide refurbishment to improve the quality of the internal space. The proposal therefore accords with policy CS1, which aims to ensure that growth is focused in the most sustainable locations and promotes the efficient use of land and buildings. The proposal also accords with policy CS3, which supports appropriate development in highly accessible locations, including Central London. The pre-application advice, dated 17 October 2016, also stated that the principle of the development is broadly acceptable, subject to design and amenity considerations.
- 7.3. Core Strategy policy CS8 seeks to promote a successful and inclusive economy in Camden through safeguarding existing employment sites and promoting and protecting the jewellery industry in Hatton Garden. Policy DP13 also seeks to retain buildings that are suitable for continued business use. The refurbishment and extension of the building will allow the continued use of parts of the building for office purposes in floor space, which will be of a much higher standard and far more adaptable for occupiers. In addition, the proposals include retention of the jewellery workshop space, which will be consolidated in the basement area. The proposals therefore accord with the aims of policy CS8 and DP13.
- 7.4. In respect of the proposed mix of uses, policy CS9 seeks to promote and protect areas of specialist activity, such as at Hatton Garden and policy DP1 seeks to provide a mix of uses within developments. Where there is an increase in floor space of more than 200 sq. m in the Hatton Garden area, a contribution to the supply of housing is not expected. However, the Council requires up to 50% of additional floor space to be in the form of secondary uses, including a contribution to affordable premises suitable for the jewellery industry. Secondary uses are particularly required where the increase in floor space is 1,000 sq. m or more. Policy DP1 also includes criteria that the Council will take into account when considering the appropriate mix of uses.
- 7.5. The proposed mix of uses is considered to be an appropriate and optimal mix for the site for the following reasons, with reference to the criteria set out in policy DP1.

a) The character of the development, the site and the area

The proposed development seeks the provision of improvements and extensions to two existing buildings within a conservation area. The site comprises a small site and the proposed extensions provide only 302 sq. m of additional office floor space. The small scale of the proposals limits the ability of the applicant to provide further workshop space on site, whilst seeking to improve existing office and workshop space within the buildings.

b) Site size, the extent of additional floor space, and constraints on including a mix of uses

- 7.6. As above, the site is constrained and is located within a sensitive heritage setting. The proposals allow for the retention and improvement of existing jewellery workshop space together with refurbishment and extension of an inefficient and dated office building.

c) The need for an active frontage and natural surveillance

- 7.7. The buildings currently contain retail floor space. The proposed development involves a small loss (42 sq. m) of retail floor space but seeks to retain 93 sq. m of retail floor space. The pre-application advice confirmed that the retention of retail space, albeit a minor reduction, was welcomed in this location. The retail use requires an active frontage and will complement the other proposed uses within the buildings. This again, limits the ability of the applicant to provide further workshop space.

d) The economics and financial viability of the development

- 7.8. The financial viability of upgrading existing office and workshop space has been weighed against the provision of additional workshop space on a small, constrained site. The proposed mix of uses will allow a financially viable development that will contribute to the economy in Camden.

e) Whether the sole or primary use proposed is housing

- 7.9. The proposals do not include housing within the mix, due to the location within Hatton Garden. This approach was confirmed as acceptable within the pre-application advice, dated 17 October 2016.

f) Whether an extension to the gross floor space is needed for an existing user

- 7.10. The proposed extensions allow additional B1 office floor space to be provided to enable the continued use of the premises for business purposes, in line with policy DP13. The proposed reconfiguration and refurbishments to the internal space will allow consolidation of jewellery workshop space in upgraded space within the basement. The proposals will therefore benefit a variety of users and will contribute to maintaining a successful and inclusive economy in Camden.

g) Whether the development is publicly funded

- 7.11. The proposed development is not publicly funded therefore consideration of viability is necessary when establishing the optimal mix of uses for the site.

h) Any other planning objectives considered to be a priority for the site

- 7.12. The Council's support for the jewellery sector in Hatton Garden is noted and it is for this reason that the proposed development seeks to retain the current quantum of workshop space available and improve its quality. However, it is noted that the Hatton Garden Conservation Area Statement states in paragraph 4.22:

"In recent years, the jewellery industry has suffered a decline in Hatton Garden and most of the jewellery sold in the retail outlets is no longer made locally. This, coupled

with a general rationalisation in manufacturing and warehousing, has affected the character and vitality of many of the streets within the area.”

- 7.13. There is a balance to be struck on this particular site between upgrading an existing premises used for business purposes, which will contribute to the local economy and the Council's aspirations for an increase in the provision of a particular use.
- 7.14. Given the above, it is considered that, on balance, the proposed mix of uses is appropriate and will bring planning benefits to the local area in accordance with aims of policy DP1.

Design and impact on heritage

- 7.15. The site is located within the Hatton Garden Conservation Area. There are also a number of listed buildings in the local area, as detailed within the accompanying design and access statement.
- 7.16. The Council has a legislative duty to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of their planning functions. Policy CS14 seeks to preserve and enhance Camden's heritage assets and their settings and requires development to be of the highest standard of design that respects local character and context. Policies DP24 and DP25 substantiate upon this policy and provide further requirements on design and conserving Camden's heritage respectively.
- 7.17. The design approach has considered and responded to the sensitive historic context in order to provide a high quality development that will preserve and enhance the character and appearance of the conservation area and will not impact negatively on any listed buildings or their settings. The design draws inspiration from the Hatton Garden jewellery quarter, an approach that was welcomed in the pre-application advice, dated 17 October 2016. The design has evolved in response to pre-application comments received and the proposed roof extension and shop front design will be in keeping with the appearance of the existing building and the character of the area. The top floor of the proposed extension will not be visible from street level as shown in the images provided within the submitted design and access statement. The proposed development therefore accords with policies CS14, DP24 and DP25.
- 7.18. The site is also located within a strategic viewing corridor: view 2A.1 from Parliament Hill to St Paul's Cathedral and view 3A.1 from Kenwood: viewing gazebo to St Paul's Cathedral. views. Policy CS14 seeks to protect these important views. As set out in the accompanying design and access statement, the proposed development will be compatible with these views as the extent of the building's highest point will be below the indicative threshold height set out in the London View Management Framework.

Amenity

- 7.19. Policies CS5 and DP26 seek to manage the impact of development on occupiers and neighbours. The pre-application advice, dated 17 October 2016, states that, as the site is in a mostly commercial area, there are likely to be limited amenity impacts. However, there are apartments in the adjacent building on Kirby Street/ Greville Street, therefore the impact on daylight/ sunlight has been considered together with noise. It is not

considered that there will be any adverse impacts in terms of overlooking, due to the set back nature of the roof extension.

Daylight/ Sunlight

7.20. In respect of daylight/ sunlight, the application is accompanied by a report prepared by Waldrams, dated 14 March 2017. The reports considered the following properties:

- Saffron House;
- 36-43 Kirby Street;
- 44-45 Kirby Street;
- 27 Greville Street;
- 28 Greville Street;
- 29-31 Greville Street; and
- The One Tun, 125 Saffron Hil.

The analysis demonstrates that all surrounding residential properties are compliant with the BRE Guidelines for daylight and sunlight with the proposed development in place. The proposed development is therefore acceptable in terms of planning policy relating to daylight and sunlight.

Noise

- 7.21. The application is accompanied by a plant noise assessment report prepared by ALN Acoustic Design. A site noise survey was carried out to establish existing background noise conditions. The results of the survey were used to determine the maximum plant noise level at noise sensitive facades. The proposed development will comply with local authority policy on noise, based on the distance to the nearest noise sensitive façade and the presence of acoustic screening.
- 7.22. The proposed development therefore accords with policies CS5 and DP26 in this respect of impact on amenity in relation to occupiers and neighbours.

Sustainability

- 7.23. Policy DP22 requires schemes to demonstrate how sustainable development principles have been incorporated into the design. The scale of the proposed development falls below the threshold requiring an energy and sustainability statement. However, an initial sustainability statement is included in the accompanying design and access statement. Sustainability considerations are summarised in this section.
- 7.24. The proposed development will involve internal refurbishment works together with rear and roof extensions. The proposals seek to improve the energy efficiency of buildings and to meet current building standards. An energy strategy will be prepared which will seek to reduce overall energy demand through a series of “lean” measures to the building. The remaining energy demand will then be supplied in the most carbon efficient way possible. It is the design team’s intention to explore the use of commercial air source heat pumps to provide space heating and cooling coupled with heat recovery air handling units to provide the required carbon savings.
- 7.25. Whilst it is proposed to add two floors to the existing building, each additional floor will be provided with an amenity/ terrace area and the roof of the 5th floor will be

predominantly plant space. It is therefore not practical to install a green/ brown roof to these areas. However, it is noted that the additional floors will not increase the existing footprint of the site and therefore the total rain water run off will not be increased.

- 7.26. Overall, the proposed development will accord with the aims of policy DP22 to promote sustainable design and construction and resilience to climate change.

8. Conclusions

- 8.1. In conclusion, this statement demonstrates that the proposed development is in accordance with policy included in the adopted development plan and that there are no material considerations that indicate that planning permission should not be granted.
- 8.2. In summary, the key points in relation to this proposal are noted below:
- Delivery of 302 sq. m of additional high quality office floor space in a highly accessible Central London location;
 - Retention of existing jewellery workshop space on site and improved quality of this space;
 - Rationalisation of the internal layout of the buildings and efficient use of the land available on the site;
 - Improving the existing office facilities to bring them up to modern standards and improving accessibility; and
 - Adding design interest to an unlisted building within the conservation area.