

RE: 3-5 Kirby Street - pre-application advice Email dated Monday 17/10/2016 14:39pm.

Hi Laura,

Apologies for the delay on this, please see our pre-app response below:

Proposal: *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 site is within the Hatton Garden Conservation Area and the Central London Area. It is not listed, nor is it within any primary or secondary retail frontages.

The key considerations for an application of this nature are as follows:

- Principle of use
- Design and access
- Amenity
- Transport
- Sustainability

Principle of use

At present the building is currently mixed use, comprising retail A1/A3 (142sqm) at ground floor; B1a Office (227sqm) at 1st-3rd floor level and Workshop space (191sqm) at basement level.

The proposal would see the retail and workshop element reduced to 126sqm and 112sqm respectively. The B1a Office element would increase to 649sqm (net increase of 422sqm).

The proposed extensions at roof level and the rear would add a gross additional floorspace of 341sqm.
Policies DP1 and DP13 note very specific requirements for the Hatton Garden Area,

DP1 notes:

In the designated Hatton Garden area, where more than 200sqm (gross) additional floorspace is provided, we will require up to 50% of all additional floor space in the form of secondary uses, including a contribution to housing and a contribution to affordable premises suitable for the jewellery industry.

With DP13 noting:

When it can be demonstrated the site is no longer suitable for B1(a) office, the Council may allow a change to permanent residential uses or community uses, except in Hatton Garden where we will expect a mixed developments that include light industrial premises suitable for use as jewellery workshops.

Therefore the general policy aim and presumption is to retain existing workshop space and to introduce additional workshop space where extensions are proposed

with objective of retaining the character of Hatton Garden as an area for light industrial workshops.

In this instance it is considered that given the proposed gross additional floorspace is only 341sqm; the existing uses would be retained within the building and that the site is relatively small and confined – housing would not be an appropriate additional use on site as it would be unlikely to fit comfortably into the building envelope (with regards to separate access, space standards and amenity without affecting the existing uses); however policy would expect the provision of workshop space.

It is considered that workshop space is appropriate to the location; as demonstrated by there being workshop space on site now. The proposal would see this space reduced from 191sqm to 112sqm. Against the background of a gross increase in floorspace of 341sqm this is contrary to policy and would be strongly resisted by the Council. It is acknowledged that the quality of space would be improved; nonetheless this is not considered to be sufficient justification for a 36% reduction of workshop space when policy requires retention and provision of such use. It is therefore unlikely that such a proposal would be supported.

The Council's Economic development team have stated that they would be unsupportive of an application that results in the reduction in jewellery floorspace in Hatton Garden. They have reiterated that 50% of all additional floorspace should be workshop space therefore the retention and enlargement of the current space would be required to ensure the scheme is acceptable.

We would seek to secure the jewellery-dedicated floorspace via a S106 agreement and also use that agreement to ensure that the space provided is suitable and affordable for jewellery users.

Our economic development team have stated that any application should include details on the existing commercial tenants, whether they will be affected by the development and whether the proposed scheme seeks to accommodate them.

The improvement of existing and introduction of additional B1a Office is considered to be acceptable, provided the appropriate amount of workshop space is provided. The site is well located in the Central London Area and is well placed for high quality office accommodation.

With regards to the retail space the site is within a Central London Local Area ('Hatton Garden') but the site itself is not within a primary or secondary retail frontage. Nonetheless the retention of the retail space is welcome in this location; the slight reduction in floorspace is considered acceptable in this instance given the potential improvements to the building and other uses within it as a result of the development.

Design

The site comprises two existing jewellery workshop/office buildings with ground floor retail units within the Hatton Garden Conservation Area. Many historic buildings within the context of the proposed site suffered bomb damage and have been rebuilt

post war. The majority of the buildings along Kirby street are therefore of modern construction with a mix of materials, design and character.

The application site is of the oldest form and construction in Kirby Street and constructed from red brick with metal crittal windows, with modern shopfronts at ground floor

The predominant building height is 4 storeys along Kirby Street – however most have received roof extensions which are set back from the front façade and largely not visible from ground level. Building adjacent the site to the north and opposite have two storey roof extensions

The overall principle of retaining and refurbishing these buildings with some form of extension is likely to be acceptable.

However there are a number of comments on/concerns with the current proposals as follows:

The windows are considered to be a valued part of the buildings' character and they should either be retained or replaced with a more sympathetic design in line with the character and language of the existing historic buildings.

The upgrading and improvement of the shopfronts are welcomed, but they should have a more traditional design appropriate for the style of the building. Large expanses of glazing should be avoided and a proposal in line with the character (workshop) and former reference to the buildings history should be explored. Examples from the area should be referenced and inform the proposals. Thought should go to signage and awnings at this stage to ensure any future works retain the overall sense of this building's language and interaction with the street.

The overall design should maintain the sense of the party wall division between the two separate plots, both at shopfront level and roof level. It is important to maintain sense of urban grain.

The proposed roof extensions are overly dominant, particularly to proportions of the narrower building to the left hand side. The scale and level of the setback proposed is not appropriate in terms of massing. A more acceptable approach would be a single storey extension (setback) with further setback plant screen.

We welcome the design inspiration from the Hatton Garden jewellery quarter in terms of materiality of roof extension, and would suggest bronze, silver, gold metal detailing as opposed to simple plate glass to ensure the roof extension is visually distinctive from the existing buildings.

Given the relatively confined nature to the rear which is only overlooked by offices and the rear of residential apartments it is considered that some form of infill extension is likely to be acceptable; nonetheless glazing may not be the most appropriate material as the brickwork at the back of the building may contribute to the character of this space; even though not widely overlooked the rear elevations

can be important features of conservation areas and materials should be carefully selected to reflect this.

The buildings are the most historic in this street and it is important to retain as much of the original character as possible to help reference the past industrial use of this area. There is chance to substantially upgrade and enhance these buildings by sensitively upgrading and adapting to suit current accommodation requirements.

The majority of the roof extensions on this road have very limited visibility from street level, any proposal to these buildings should maintain this although it is considered that the proposal should incorporate a modern and unique design that will still sit sensitively with and react to the host building in an appropriate manner.

Access

The Council's Access officer has provided the following advice on the proposals:

The unisex wheelchair accessible WC's are not correctly laid out and this should be amended. Also the unisex wheelchair accessible WC's should be handed on alternate floors to offer a choice between left and right hand transfer.

The new lift is most welcome but should have a minimum lift car dimension of 1100mm wide and 1400mm deep. This size lift car will require a mirror on the back wall so that wheelchair users can safely reverse out of or into the lift as the lift is not large enough to turn in. A 2000mm wide by 1400mm deep lift allows a wheelchair user to turn in the lift car.

The new stairs should have handrails on both sides that are continuous across mid landings and which extend horizontally by 300mm beyond the top and bottom step. The steps should have a contrasting nosing on both the tread and riser.

The glass façade and entrance doors at ground floor level should have permanent manifestation at two levels; 850-1000mm and 1400-1600mm. the glass doors should be made apparent from the glass façade with a high contrast strip on the top and both sides of the door frame.

Amenity

The site is in a mostly commercial area, therefore there are likely to be limited amenity impacts.

However, there are apartments in the adjacent corner building on Kirby Street/Grevill Street which backs onto the site. The rear of this apartment building would appear to present either stairwells or frosted bathroom windows, with no primary or important windows. A site visit once a full planning application is submitted will be able to confirm this. If this is the case there are unlikely to be any overlooking or daylight sunlight issues.

However, the plant at roof level could present a noise issue for these residents and as such a full acoustic report showing compliance with Camden's noise requirements should be submitted with any future application.

Transport

Cycle Parking

Development Policy DP18 (Paragraphs 18.12 and 18.13) requires a development to provide cycle parking facilities in accordance with the minimum requirements of our cycle parking standards (Refer to Appendix 2 of Camden Development Policies document). We also expect the development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan.

Table 6.3 in the London Plan lists the minimum number of cycle parking spaces required for the following uses:

- (A1-A5), Long-stay: from a threshold of 100 sqm: 1 space per 175 sqm, short-stay: from a threshold of 100 sqm: 1 space per 40 sqm;
- (B1), Long-stay: 1 space per 90 sqm, short-stay: first 5,000 sqm: 1space per 500 sqm; and
- (B1 light industry), Long-stay: 1 space per 250 sqm, short-stay: 1 space per 1000 sqm.

In order to comply with policy the applicant must therefore include the following number of cycle parking spaces:

- 1 long-stay spaces and 4 short-stay space (A1-A5);
- 8 long-stay spaces and 2 short-stay spaces (B1); and
- 1 long-stay space (B1 light industry).

The applicant must therefore provide 10 long-stay spaces and 6 short-stay spaces in total.

Cycle parking must be located close to the site entrance and the route to cycle parking from street level should be step free or, if level access is not available, the cycle parking must be accessible via a ramp or lift that is adequate enough in size to accommodate a bike.

Long-stay cycle parking must be located internally and is required to be covered, secure and fully enclosed and need to be of sufficient dimensions to allow access and egress to them easily and comfortably with their bicycles. Lockers and showers must also be provided for staff use.

Short-stay cycle parking must be located within close proximity of the entrance and preferably on street level. Secure facilities must be provided in accordance with appendix 3 of Camden's CPG7 guidance.

The applicant must include all detailed dimensions of the facilities to be installed as part of the planning application. The cycle parking facilities and access arrangements would need to comply with the guidance provided within CPG7 and

should be submitted to Transport Strategy for consideration prior to determination of the planning application. CPG7 is available on the Camden at the hyperlink below: <http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

It is noted that from the plans that the proposal wishes to install a cycle store to house up to 14 cycles. The plans should be revised to separate the long and short-stay cycle parking to provide a secure separation between staff and visitor parking.

Highway Works Contribution

The summary page of Development Policy DP21 states that 'The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'.

It is anticipated that Camden would need to undertake highway remedial works following completion of the proposed development and a financial contribution for highway works should be secured as a Section 106 planning obligation. This however will be confirmed at full planning stage once the draft CMP is reviewed. A highways cost estimate will be requested from our Highways Delivery Team during the formal planning application process if it is so required.

Management of Construction Impacts on the Public Highway in the local area

The proposal would involve a significant amount of construction works and this is likely to generate a significant number of construction vehicle movements during the overall construction period. Our primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion. There are a number of sites within close proximity to the site which must be considered in order to reduce cumulative impacts.

The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. It is therefore likely that a CMP will be required to be secured as a Section 106 planning obligation at the full planning application stage.

The Council has a CMP pro-forma which must be used once a Principal Contractor has been appointed. The CMP, in the form of the pro-forma, would need to be approved by the Council prior to any works commencing on site. The CMP pro-forma is available on the Camden website at the hyperlink below: <http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/planning-agreements/>

A financial contribution of £1,140 would need to be secured to cover the costs of reviewing the Construction Management Plan. This would also need to be secured by a Section 106 planning obligation if planning permission is granted.

Some highway licenses would be required to facilitate the proposed works. The applicant would need to obtain such highway licences from the Council prior to commencing work on site. Any such licence requirements should be discussed in the CMP. Details for the highway licences mentioned above are available on the Camden website at the hyperlink below:

<http://www.camden.gov.uk/ccm/content/business/business-regulations/licensing-and-permits/licences/skips-materials-and-building-licences/building-licences/>

Sustainability

All new developments are expected to be designed so as to minimise carbon dioxide emissions. Camden's Policy and Guidance requires that schemes of over 500sqm additional floorspace should provide an energy and sustainability statement. This proposal would fall below that threshold and as such no formal documents are required.

Nonetheless, all buildings, whether being updated or refurbished, are expected to reduce their carbon emissions by making improvements to the existing building. Work involving a change of use or an extension to an existing property is included. As a guide, at least 10% of the project cost should be spent on the improvements. Where retro-fitting measures are not identified at application stage we will most likely secure the implementation of environmental improvements by way of condition.

The Council expects all developments to be designed to be water efficient by minimising water use and maximising the re-use of water. This includes new and existing buildings.

Camden Planning Guidance 3: Sustainability provides further detailed advice and guidance on appropriate measures, Appendix 1 sets out a checklist of retro fit improvements for applicants to follow.

Development Policy DP22 states that schemes must incorporate green or brown roofs and green walls wherever suitable. Due to the number of environmental benefits provided by green and brown roofs and green walls, where they have not be designed into a development the Council will require developers to justify why the provision of a green or brown roof or green wall is not possible or suitable. In this instance there would appear to be ample opportunity to introduce a green or brown roof or potentially green wall to the rear.

Summary

The principle of combining the two buildings to improve the existing retail, office and workshop space, with extensions at roof level and the rear is broadly considered to be acceptable.

However, the reduction in workshop space is contrary to policy and will be resisted. Whilst the principle of a two storey roof extension is likely to be unacceptable as it would overwhelm the host buildings. A single storey, set back roof extension with further set back plant is likely to be a more appropriate approach.

The removal of window detailing would similarly be resisted, they are considered to be important features of the host building and should be retained or reinstated in a traditional form.

More traditional shopfront elements should be introduced at ground floor level; there is the potential for traditional fascias, window detailing and awnings to be introduced which would improve the appearance of the building.

The design detailing at the roof level needs further consideration to ensure a separation between the buildings to maintain urban grain; however taking inspiration from the Hatton Garden Jewellery quarter is an interesting approach and we would encourage the use of more metallic finishes as opposed to wholly plate glass.

Summary of likely non-standard S106 Planning Obligations and Conditions

- A condition requiring the provision of a minimum of 10 long-stay and 6 short-stay cycle parking spaces. The cycle parking facilities should be designed to Camden Council's design specifications as detailed in CPG7 and the ongoing retention of this facility, details of which will need to be submitted and approved, and approval should be reserved by condition;
- A Section 106 planning obligation to secure a financial contribution to cover the cost of highway works in the general vicinity of the site;
- A Section 106 planning obligation to secure a Construction Management Plan (CMP). The Section 106 agreement shall state that the CMP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority;
- A Section 106 planning obligation to secure a one off financial contribution of £1,140 to cover the costs of reviewing the Construction Management Plan;
- A section s106 planning obligation to secure the jewellery dedicated floorspace permanently as such and to ensure it is suitable and affordable for jewellery users.

List of documents and information likely to be required

- Site location plan
- Existing and Proposed scaled drawings and plans
- Noise, vibration and ventilation assessment
- Planning statement

- Design and Access Statement

Kind regards,
Fergus Freeney
Senior Planning Officer

Telephone: 020 7974 3366