



Planning, Heritage, Design & Assess Statement

Da Vinci House, 44 Saffron Hill, London

Iceni Projects Limited on behalf of
E&A (Saffron Hill) Limited

August 2017

ICENI PROJECTS LIMITED
ON BEHALF OF E&A
(SAFFRON HILL) LIMITED

**Planning, Heritage, Design & Assess
Statement**

DA VINCI HOUSE, 44 SAFFRON HILL, LONDON

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APPENDICES

APPENDIX A1: SITE LOCATION PLAN

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Icen Projects Limited ('Icen') on behalf of E&A (Saffron Hill) Limited (the 'Applicant'). This Planning Statement is prepared in support of a detailed planning application for the change of use of the lower ground and part ground floor of Da Vinci House, 44 Saffron Hill (the 'site'), located in the administrative boundary of the London Borough of Camden ('Camden'). A Site Location Plan is included at **Appendix A1**.

Appendix A1

- 1.2 The Applicant is seeking planning permission for the following:

- 1.3 *"Change of use of the lower ground and part ground floor to Class B1a (Office) use, together with minor external alterations."*

Submission Documents

- 1.4 In order to inform the planning application submission, the following technical documents and drawings have been prepared by the consultant team and are submitted in support of this application:

- One duly completed Planning Application Form;
- Completed Certificate B and Copy of Notices as Served;
- Site Location Plan at scale 1:1250 @ A4 with the site edged in red;
- Existing Ground Floor Plan (Dwg No. Ex-G 001);
- Existing Lower Ground Floor Plan (Dwg No. Ex-LG 001);
- Existing Lower Ground Floor Sections (Dwg No. EXS 001);
- Existing Side Elevation A (Dwg No. Ex-E001);
- Existing Saffron Hill Elevation B (Dwg No. Ex-E002);
- Proposed Ground Floor Plan (Dwg No. G 001);
- Proposed Lower Ground Floor Plan (Dwg No. LG 001);
- Proposed Lower Ground Floor Sections (Dwg No. S 001);
- Proposed Side Elevation A (Dwg No. E001);
- Proposed Saffron Hill Elevation B (Dwg No. E002);
- Sustainability & Energy Statement prepared by Icen Projects;
- BREEAM Pre-Assessment Report prepared by Sustainable Construction Services;
- Planning, Heritage, Design and Access Statement (this Statement);
- CIL Additional Information Form; and
- Payment of £385.

Structure of Planning Statement

- 1.5 The purpose of this Statement is to provide an overview of the existing site, the site history and to provide a justification for the proposed development.

The statement is structured in the following format:

- Section 2 – The Application Site and Surrounding;
- Section 3 – The Development Proposals;
- Section 4 – Planning Policy Summary;
- Section 5 – Planning Considerations; and
- Section 6 – Summary and Conclusions.

2. THE APPLICATION SITE AND SURROUNDINGS

Site and Surroundings

- 2.1 The application site comprises of the existing lower ground, and part ground floor of 'Da Vinci House' at 44 Saffron Hill, within the Farringdon area of Central London.
- 2.2 Da Vinci House was originally constructed in the 1950's as a Printing Works, which was later amended to light industrial and warehouse use in 1971, and subsequently to office use in 1988. Planning permission for the current residential use of the building was permitted in 1996, and extensions were later allowed to the roof of the building in 2011/2012. Accordingly, the entire building now comprises of 8-storeys of residential accommodation, with car parking at ground and lower ground floor levels (which forms the extent of the application site).
- 2.3 The site has pedestrian accessed from both Saffron Hill and St Cross Street. Vehicular access to the site is obtained from St Cross Street, to the existing ground floor and basement car park which serves the residential accommodation above.
- 2.4 To the north of the site, across St Cross Street, is the NCP Car Park and to the east of the site, across Saffron Hill is '20-24 Kirby Street', a six-storey office building. To the south (rear) of the site is Wonderberry House, a six-storey residential building, and 1 Lilly Place, a former territorial army drill hall which now comprises of seven self-contained flats.
- 2.5 Adjoining the site to the east is the currently vacant plot of 13 St Cross Street, which recently obtained planning permission on appeal for the erection of a seven-storey building to provide 8 self-contained flats (LPA Ref: 2011/1433/P). This planning permission is yet to be implemented.
- 2.6 The Site is located approximately 0.2 miles (3 min's walk) from Farringdon Station) and 0.4 miles (8 min's walk) from Chancery Lane Station. There are several bus stops within close proximity of site along Farringdon Road, providing services to Kings Cross, Clerkenwell and Honor Oak. Accordingly, the site is afforded an excellent public transport accessibility rating (PTAL) of 6b.
- 2.7 The area surrounding the application site is characterised by commercial and retail uses, with a large proportion of office floor space. Saffron Hill itself is heavily dominated by office uses at both basement and ground floor levels, often with additional office accommodation or residential uses above, including 20-24 Kirby Street and Dunstan House, located on the opposite corners of the St Cross Street/ Saffron Hill intersection. To the west of the site is the Hatton Garden Area, which is world-renowned as a specialist jewellery sector.

Planning History

2.8 There is an extensive planning history for the site, details of which are provided below:

- LPA Ref: N16/12/A/10573 - Change of use of 44 Saffron Hill E.C.1 from printing works to: 2nd floor - Light industry (2 900 sq.ft only); basement, ground 1st and 4th floors - storage (33 000 sq.ft). Approved 17 February 1971.
- LPA Ref: 8800301 - Use for purposes falling into Class B1 of the Town and Country Planning (Use Classes) Order 1987 as shown on drawing numbers DGC.A DGC.B DGC.C DGC.D DGC.E DGC.F & DGC.G. Approved 06 July 1988.
- LPA Ref: 8900275 - Alterations and extension to existing office building to provide additional office floorspace including construction of a new fifth floor. Appeal Allowed 16 February 1990.
- LPA Ref: 9000185 - Approval of details pursuant to planning permission (Reg.No.PL/8900275) granted on appeal. (Plans submitted). Approved 04 April 1990.
- LPA Ref: 9501231 - Conversion of an existing business use building to 23 self-contained flats, with 23 car parking spaces, a roof extension and alterations. Approved 22 July 1996.
- LPA Ref: PS9704520 - Erection of an additional floor and roof terrace and provision of two new parking bays in the basement. Refused 29 August 1997.
- LPA Ref: PS9904612 - Removal of 2 windows and 1 door on the rear balcony and replacement with timber and glass folding doors, as shown by drawing numbers 001, 002 and photographs of the rear elevation. Approved 17 August 1999.
- LPA Ref: PSX0204804 - The use of the basement area as a gym/sport facility within Class D2 and the installation of a mezzanine level over the ground floor car park to be used as a single dwelling unit. Refused 13 November 2002.
- LPA Ref: 2006/2990/P - Change of use of lower ground floor from car parking to a storage area (Class B8). Approved 23 February 2006.
- LPA Ref: 2010/5408/P - Erection of replacement fifth floor and new sixth floor to provide additional accommodation for two existing fifth floor self-contained residential flats (Class C3) and associated works including external terrace areas with balustrades at sixth floor and roof level, two rooftop access enclosures and green roof following demolition of existing fifth floor. Approved 22 June 2011.
- LPA Ref: 2011/5571/P - Erection of replacement fifth floor, new sixth floor and new part seventh floor to provide additional accommodation for two existing fifth floor self-contained residential flats to become maisonettes (Class C3) and create two new additional self-contained flats at fifth floor level (1x studio and 1x1 bed unit - Class C3) and associated works including external terrace areas with balustrades at sixth floor and seventh (roof) level, green roof and fenestration alterations following demolition of existing fifth floor. Approved 18 November 2011.
- LPA Ref: 2012/3660/P - Details of new balustrades, plan, elevation and section drawings, manufacturing specifications of all new doors and windows required by condition 2b and samples of the materials of the external surfaces of the extension as required by condition 3 of Planning Permission granted on 22/06/2011 (ref: 2010/5408/P for the erection of replacement fifth floor and new sixth floor to provide additional accommodation for two existing fifth floor self-contained residential flats (Class C3) and associated works including external terrace areas with balustrades at sixth floor and roof level, two rooftop access enclosures and green roof following demolition of existing fifth floor.). Approved 30 July 2012.

- LPA Ref: 2012/4854/P - Replacement of 19 windows to front elevation facing Saint Cross Street, 9 windows to side elevation facing Saffron Hill, 6 windows to side elevation, and 4 windows to rear elevation, all in relation to residential flats (Class C3) at first, second, third and fourth floor levels. Approved 05 October 2012.
- LPA Ref: 2013/2495/P - Variation of condition 8 (development to be carried out in accordance with the approved plans) attached to planning permission dated 20/07/2012 Ref: 2011/5571/P for the erection of replacement fifth floor, new sixth floor and new part seventh floor to provide additional accommodation for two existing fifth floor self-contained residential flats to become maisonettes (Class C3) and create two new additional self-contained flats at fifth floor level (1x studio and 1x1 bed unit - Class C3) and associated works including external terrace areas with balustrades at sixth floor and seventh (roof) level, green roof and fenestration alterations following demolition of existing fifth floor. Variations include omission of the two studio units. Approved 01 July 2013.

- 2.9 There is no later planning history in relation to Da Vinci House. From the available planning history, we understand that the building was originally used as Printing Workshop, and later amended to light industrial / warehouse use (LPA Ref: N16/12/A/10573), and subsequently to an office in 1988 (LPA Ref: 8800301).
- 2.10 The entire property was converted to residential use in 1996 (LPA Ref: 9501231), and the basement and ground floor were utilised for the provision of 23 car parking spaces.
- 2.11 Notwithstanding, in 2006 (LPA Ref: 2006/2990/P), planning permission was approved to use the basement floor of the premises for Class B8 (Storage or Distribution) purposes. The Officer's report prepared in support of LPA Ref: 2006/2990/P, confirmed that the principle of the loss of private car parking for residential uses within the Central London Area would be compatible with the Council's aspirations to encourage travel by sustainable means. Therefore, the change of use was considered to be acceptable, albeit we understand that this permission was never implemented.
- 2.12 Accordingly, we are of the opinion that the basement and ground floors of the premises continue to benefit from planning permission as an ancillary residential car park (Use Class C3).
- 2.13 Planning permission was later approved for the extension of the building, to provide additional self-contained flats at sixth and seventh floor levels. These flats were secured as 'car-free' via the S016 agreement, meaning future occupants would not be eligible for a car-parking space, or an on-street parking permit. Accordingly, the permission did not place any further demand on the existing car park. Therefore, the result of this is an existing large private residential parking space which is significantly underutilised and a gratuitous use of land in this part of central London.
- 2.14 In light of the above, we do not consider there to have been any material change in circumstances since the ground and basement floors were previously approved for an alternative, Class B8, use.

3. THE DEVELOPMENT PROPOSALS

3.1 This section outlines the proposed development scheme which is the subject of this planning application.

3.2 The proposed description of development is as follows:

“Change of use of the lower ground and part ground floor to Class B1a (Office) use, together with minor external alterations”

3.3 The proposal seeks full planning permission for the conversion of the vacant residential car park at Lower Ground floor level, to new office floor space (Class B1a). To facilitate the proposed change of use the following internal and external alterations are also required:

- Relocation of 2 no. car parking spaces from lower ground to ground floor;
- Removal of existing vehicle ramp to create self-contained lower-ground floor office use, whilst maintaining residential access from St Cross Street, and new commercial access from Saffron Hill;
- Relocation of existing residential refuse store (to contain 2 no. general waste, and 2 no. recycling bins, to better existing arrangement);
- Insertion of new lift (1.5 metres by 1.6 metres);
- Creation of new commercial refuse store (to contain 1 no. general waste and 1 no. recycling bin);
- Reconfiguration of existing fire escape to Saffron Hill, to create new office entrance;
- Marking out of pedestrian and cycle walk-way to existing vehicular access from St Cross Street.
- Creation of new shared plant area for residential and commercial equipment (internal only);
- Installation of 2 no. air conditioning units (internal only);
- Installation of double-leaf doors to existing external plant area on west corner of the site (for maintenance access, only);
- Installation of 8 no. secure cycle parking space (7 no. long-stay and 1 no. short-stay);
- Provision of 5 no. W/C self-contained cubicles, 1 no. wheelchair-accessible W/C cubicle and 2 no. combined shower/W/C self-contained cubicles;
- Installation of ceiling and floor insulation, together with MF ceiling frame board to enclose ceiling services area;
- Installation of new triple-panel double glazed screens and louvre grills to existing external residential plant area;

- Replacement of existing Fire Exit door to Saffron Hill with new double-leaf glazed entrance door (2.1 metres (w) by 3.2 metres (h), outward opening, with brushed stainless-steel frame and fixings).
- 3.4 The Lower Ground Floor car park has been under-utilised for a prolonged period, as only 2 no. residents were leased car parking spaces within this area. Prior to the application submission, revised leases were agreed with the relevant parties, to relocate the 2 no. car parking spaces to the ground floor level. Accordingly, the ground floor car park will continue to facilitate 19 no. vehicles, which are leased to individual residential units, above.
- 3.5 The footprint and bulk of the existing building is to be unaltered by these proposals, with the main changes being made in order to refurbish the building in line with the specifications of a high-quality Category A modern office floorspace.
- 3.6 Access to the new office will principally be obtained from Saffron Hill, via the former Fire Exit, which will be amended to create a new lobby (from the proposed glazed double-entrance door) with separate internal access doors to the new office below, and residential accommodation above, ensuring a safe means of escape is retained for all in the event of a fire.
- 3.7 An additional access point for deliveries, wheelchair users, and those with bicycles, will be facilitated via the existing vehicular access on St Cross Street. A pedestrian/cycle path will be marked out within the vehicle access route (shown in yellow on the accompanying Proposed Ground Floor Plan), to ensure there is no conflict between users, which will lead to a new dedicated lift for access to the lower ground floor. The proposed lift will have dimensions of 1.5 metres by 1.6 metres, to ensure cyclists and wheelchair users have sufficient manoeuvring room.
- 3.8 The existing residential refuse store will be relocated approximately 1 metre further into the building, to the area currently occupied by the vehicle ramp, ensuring the current refuse collection arrangements remain unaltered by way of the proposals.
- 3.9 A new separate refuse store will also be created at ground floor level, to serve the proposed office accommodation. The refuse store will be located approximately 8 metres from the pavement, to enable collection and is externally accessible, via the gated vehicle access point, which can be opened remotely in time for collection.

4. PLANNING POLICY

- 4.1 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) states that applications for development should be determined in accordance with the Development Plan unless materials considerations indicated otherwise.

National Planning Policy

- 4.2 The National Planning Policy Framework (NPPF), which came into effect on 27 March 2012, sets out the Government's planning policies for England. The adopted Framework supersedes the myriad of Planning Policy Statements (PPS) and Guidance (PPG) documents. At the heart of the NPPF is a presumption in favour of sustainable development.

- 4.3 The NPPF recognises that there are three dimensions to sustainable development; economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles, which are mutually dependent and should not be undertaken in isolation:

- *An Economic Role* - contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying coordinating development requirements, including the provision of infrastructure;
- *A Social Role* - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and supports its health, social and cultural well-being; and
- *An Environmental Role* - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

- 4.4 In supporting/delivering sustainable development, Paragraph 18 of the NPPF promotes the creation of jobs and the building of a strong competitive economy through development. Accordingly, the NPPF advocates that the planning system should operate to encourage and support sustainable economic growth with significant weight placed upon this. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century (Paragraph 20 of the NPPF).

- 4.5 **Paragraph 111** specifically states that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

- 4.6 **Paragraph 118** requires local planning authorities to seek to avoid noise from and giving rise to significant adverse impacts upon health and quality of life from development, and where appropriate, seek to mitigate through the use of planning conditions.

The London Plan

- 4.7 In March 2016, the Mayor's Spatial Strategy for London, known as 'The London Plan' was consolidated to include the Further Alterations to the London Plan (2015) and Minor Alterations to the London Plan (2016).
- 4.8 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.
- 4.9 The following policies from the London Plan are considered relevant to the application proposals:
- Policy 2.11 'Central Activities Zone – Strategic Functions' – seeks to ensure that development proposals to increase office floorspace within the CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the London Plan.
 - Policy 4.1 'Developing London's Economy' - seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy.
 - Policy 4.2 'Offices' – states that the Mayor will enhance London's attractions for businesses or different types and sizes, including small and medium sized enterprises. Part b of the Policy continues that the strengths of the diverse office market in the Capital will be consolidated and extended by focusing new development in viable locations with good public transport accessibility, amongst other matters. At Part d, the Policy also provides that increases in the current office stock should be increased where there is evidence of sustained demand for office-based activities.
 - Policy 6.9 'Cycling' – sets out to developments should provide secure, integrated, convenient and accessible cycle parking facilities. The policy highlights the minimum cycle parking standard for Central London Business Office is 1 space per 90 sq m (long-stay) plus 1 space per 500 sq m for visitors (short-stay).
 - Policy 7.2 'An Inclusive Environment' – seeks to achieve the highest standards of accessible and inclusive design, in all new development in London. This is deemed key to ensuring that the built environment is safe, accessible and convenient and enables everyone to access jobs, opportunities and facilities.
 - Policy 7.8 'Heritage Assets and Archaeology' – recognises the importance of identifying London's heritage assets and historic environment so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

Local Development Framework for Camden

- 4.10 The Local Development Framework for Camden comprises of the recently adopted 'Camden Local Plan (2017)' together with the Local Development Framework Policies Map (2016), and a number of Supplementary Planning Documents.
- 4.11 The Local Plan (2017) provides the vision, objectives and spatial policies to guide development in the Borough up to 2031, and sets out detailed planning policies to use for determining planning applications.
- 4.12 The Camden Policies Map (2016) identifies the site as being within the Central London Area and the Hatton Garden Area. The site is also within the Hatton Garden Conservation area and an Archaeological Priority Area.
- 4.13 We consider the following policies of the Local Plan (2017), relevant to this application:
- Policy H2 – Maximising the supply of self-contained housing from mixed-use schemes;
 - Policy G1 – Delivery and Location of Growth;
 - Policy E1 – Economic Development;
 - Policy E2 – Employment Premises and Sites;
 - Policy A1 – Managing the Impact of Development;
 - Policy D1 – Design;
 - Policy D2 – Heritage
 - Policy CC1 – Climate Change mitigation;
 - Policy CC2 – Adapting to Climate Change; and
 - Policy CC 5 – Waste;
 - Policy T1 – Prioritising walking, cycling and public transport; and
 - Policy T2 – Parking and car-free development.
- 4.14 **Policy H2** promotes the inclusion of self-contained homes as part of non-residential development proposals. The policy states that in the Central London Area, where development involves additional floorspace of more than 200 sq. m (GIA), 50% of all additional floorspace should be self-contained housing. The explanatory text, at Paragraph 3.41 states that the policy applies to “all proposals for new build non-residential development and extensions involving a significant floorspace increase”.
- 4.15 **Policy G1** seeks to deliver growth across the borough, including the provision of 695,000sqm of office floor space by 2031, by securing high quality development and promoting efficient use of the

land and buildings. The policy also seeks to support development that makes the best use of its site in terms of quality of design, its surroundings, sustainability, amenity, heritage, and transport accessibility.

- 4.16 **Policy E1** seeks to secure a strong economy by creating the conditions that encourage economic growth such as supporting businesses of all sizes; maintaining a stock of premises suitable for all businesses; and, supporting and promoting the various clusters of businesses, services and creative industries including the jewellery industry in Hatton Garden.
- 4.17 New office development to the growth areas of the borough, including the Central London Area, will be needed to meet the forecast demand of 695,000sqm of office floor space. While the majority of new office space is expected at large Central London sites such Euston, smaller scale office development will also occur across the borough.
- 4.18 Similarly, **Policy E2** also seeks to protect employment sites by resisting proposals that include non-business uses. Instead the Council seeks to 'have a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility'. Development in the Hatton Garden Area encourages jewellery uses and proposals for non-business use will need to include provision for jewellery workshops.
- 4.19 **Policy A1** aims to protect the quality of life for all occupiers and residents; and balance this will the needs of the development. Issues to be considered include visual privacy and outlook; sunlight, daylight and overshadowing.
- 4.20 **Policy D1** aims to secure a high-quality design for all development that considers the local context and character and, in particular, preserves and enhances any heritage assets. Materials should be sustainable and durable, and of a high quality that complements the local character. In general, the Council welcomes high quality modern design, except where there is a homogenous design, such as a Georgian Squares.
- 4.21 **Policy D2** aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets including conservation areas and listed buildings. The Council 'will not permit the loss of or substantial harm to' such assets unless it can be demonstrated that the substantial harm will have a significant public benefit. The Council will also not permit development that results in harm that is 'less than substantial to the significance' of the asset without public benefits that outweigh that harm.
- 4.22 In conservation areas, Policy D2 will support applications that preserve, and where possible enhance the character of the area.

- 4.23 **Policy CC1** states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards, including; reducing carbon dioxide emissions (in line with the energy hierarchy); ensuring the location of development minimises the need to travel by car; supporting energy efficiency improvements to existing buildings; and, expecting all development to optimise resource efficiency.
- 4.24 **Policy CC2** provides that all developments should adopt appropriate climate change adaptations measures, including expecting non-domestic developments of 500 sqm of floorspace to above to achieve “excellent” in BREEAM assessments and encouraging zero carbon from 2019.
- 4.25 **Policy CC5** seeks to ensure developments include facilities for the storage and collection of waste and recycling.
- 4.26 **Policy T1** promotes sustainable transport by prioritising walking, cycling, and public transport in the Borough. Developments should provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3), and make provision for high-quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.
- 4.27 **Policy T2** requires all new developments in the borough to be car-free, and states that the Council will support the redevelopment of existing car parks for alternative uses.

Supplementary Planning Documents (SPD) and other Planning Policy Guidance

Camden Planning Guidance (CPG) 1: Design (2011)

- 4.28 CPG1 seeks to achieve a high-quality design in the Borough and encouraging applicants to consider ‘context, height, accessibility, orientation, siting, detailing and materials’ (Paragraph 2.8).
- 4.29 Section 3 of CPG1 ‘Heritage’, states at Paragraph 3.23 that proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them.
- 4.30 At the time of writing, the Camden Planning Guidance documents were under the early stages of review, however no changes have been put forward as yet, and therefore this policy remains a material planning consideration.

Hatton Garden Conservation Area Statement 1999

- 4.31 The Hatton Garden Conservation Area Statement was adopted by the Council as supplementary planning guidance in August 1999.

- 4.32 The Statement confirms that the merit of the Hatton Garden Conservation Area is defined largely by the quality and variety of architecture as well as the unique pattern of streets, which is not limited to one particular period or style, but rather the combination of styles within their own groupings.
- 4.33 The Statement recognises the considerable changes in use of buildings within the Hatton Garden Conservation Area throughout the last few centuries, as the area has transformed into a commercial and retail centre.

5. PLANNING CONSIDERATIONS

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) states that applications for development should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Three Dimensions of Sustainable Development

- 5.2 The proposal seeks to deliver a high-quality, sustainable form of development, achieving economic, social and environmental benefits.
- 5.3 The proposed office accommodation will be sustainably located, within the Farringdon area of Central London, within close proximity to a range of residential, commercial, retail, health and leisure uses. The site is located within 3 minutes' walk of Farringdon and 8 minutes' walk of Chancery Lane Station, ensuring the site is accessible by a choice means of public transport.
- 5.4 The proposed addition of secure cycle parking, and associated facilities to encourage cycle parking (i.e. showers, lockers and changing areas), also seek to improve the sustainable transport options for the site.
- 5.5 As set out in the accompanying Energy & Sustainability Statement prepared by Icen Projects, the proposed redevelopment will achieve a BREEAM 'Very Good' rating, and carbon dioxide reduction of 15.7% against the Part L2A:2013 baseline for new building commercial developments. Accordingly, and given the proposal seeks the refurbishment of the building only, the proposal will achieve significant environmental benefits, in accordance with Paragraph 14 of the NPPF.
- 5.6 In addition to the inherent sustainability benefits of reusing a redundant part of an existing building within a sustainable location, by virtue of the proposed change of use, circa 50 people will be employed at the site (Employment Densities Guide – HCA 2010), providing clear social and economic benefits.
- 5.7 The redevelopment of the basement and part ground floor will also contribute to the borough's office stock, and attract significant business rates, to the benefit of the Council.
- 5.8 The proposal will also lead to the creation and security of jobs within the construction industry and contribute further to the local workforce, who will support local businesses, restaurants and shops.
- 5.9 Accordingly, the proposed development is considered to be in-line with the overarching principles of sustainable development and meeting the needs of businesses, as set out in the NPPF.

- 5.10 The other main issues to be considered in the determination of this application include the principle of development, how the proposal relates to the character and appearance of the context of the area, highways and transport issues, and energy/sustainability matters which we turn to address in the context of relevant national, regional and local planning policy, below.

Principle of Development

- 5.11 Policy G1 of the new Local Plan seeks to deliver 695,000sqm of office floor space by 2031, with an emphasis on promoting efficient use of land and buildings to meet this requirement. In addition, Policy T2 explicitly supports the reuse of existing car parks in the borough for alternative uses. Whilst Policy H2 seeks to promote the inclusion of self-contained homes as part of non-residential developments, this only relates to new build development and extensions involving a significant increase in floorspace.
- 5.12 Accordingly, the proposed change of use, which will secure 587 sqm of office floorspace within the borough, will contribute to the Council's office target, whilst supporting the delivery of a new business through the conversion of an existing building, not resulting in any uplift of new build floorspace. As such, the proposal will meet the objectives and criteria of Policies G1, T2 and H2.
- 5.13 The site is located within the Hatton Garden Area, wherein the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses in accordance with Policy E2 of the Local Plan. The existing premises comprises of a redundant residential basement car park, and therefore currently make no contribution to the jewellery industry in Hatton Garden. The proposed change of use will secure office floorspace to accommodate a new business in the Hatton Garden Area. Whilst any future business may not directly be related to the jewellery industry, it will provide increased footfall in the area, supporting existing businesses within the Hatton Garden Area. In addition, the proposal will provide new office stock suitable for the needs of medium sized businesses, in accordance with Policies E1 and E2 of the Local Plan, and Policies 2.11, 4.1, 4.2 of the London Plan.
- 5.14 The application site comprises of a redundant residential car park, which has been under-utilised for a lengthy period. Only 2 no. car parking spaces were demised to residents in the basement car park, which will be pre-provided on the ground floor, in the area currently occupied by the vehicle ramp. As such, the proposal will not result in any loss of car parking for the existing residents of the building.
- 5.15 Notwithstanding, we note that Policy T2 of the Local Plan provides strong support for reusing existing car parks in the borough for alternative uses, in seeking to make the best use of all previously developed land and buildings. As such, the proposal complies with Policy T2.

- 5.16 Moreover, we note that planning permission was previously approved in 2006 (LPA Ref: 2006/2990/P), to convert the basement floor of the premises for Class B8 (Storage or Distribution) purposes. The Officer's report prepared in support of LPA Ref: 2006/2990/P, confirmed that the principle of the loss of private car parking for residential uses within the Central London Area would be compatible with the Council's aspirations to encourage travel by sustainable means. Therefore, we are of the opinion that the principle of development has also previously been found to be acceptable to the Council.
- 5.17 In light of the above, we are of the opinion that the proposed change of use should be acceptable to the Council, in accordance with Local, Regional and National planning policies.

Heritage, Conservation and Design

- 5.18 By way of the proposals, a small number of minor external alterations are required to facilitate the change of use.
- 5.19 The site is located within the Hatton Garden Conservation Area, wherein Policy D2 of the Local Plan seeks to preserve and enhance Camden's heritage assets. However, we note from the Hatton Garden Conservation Area Statement that Da Vinci House makes no contribution to the significance and character of the area.
- 5.20 Principally, the proposed alterations relate to the replacement of the existing Fire Exit door with a new double-leaf glazed entrance door, complete with brushed stainless-steel frame and fixings. The double-door will provide entrance to a new lobby area, with separate access doors for the residential and office accommodation. No alterations are proposed to the St Cross Street elevation.
- 5.21 The new doors will be identical in size to the existing fire exit, and will feature modern, high-quality materials, to complement the local character of the area, particularly Saffron Hill, where commercial entrances of this type are common-place. As such the proposal will accord with Policy D1 and D2 of the Local Plan. The new glazed doors will also afford views into the interior of the premises, and create more of an active frontage in what is currently an inactive part of Saffron Hill.
- 5.22 In addition, new glazed panels and louvres will be provided to restrict access to the external residential plant area, albeit these alterations will be at lower-ground floor level, and therefore undiscernible from the streetscene.
- 5.23 In light of the above, the proposed minor external alterations will not result in any harm to the character or appearance of the area, and in all likelihood, will improve the general appearance of the building when viewed from Saffron Hill.

Amenity

- 5.24 Policy A1 aims to protect the quality of life for all occupiers and residents; and balance this will the needs of the development. Issues to be considered include visual privacy and outlook; sunlight, daylight and overshadowing, and noise.
- 5.25 The proposed change of use does not involve any alteration to the bulk, scale and massing of the site, nor does it propose to introduce any new windows above lower-ground floor level. As such, the proposed change of use is not anticipated to create any degree of overlooking, overshadowing or loss of sunlight/daylight.
- 5.26 Notwithstanding, by way of the proposals, the installation of 2 no. air conditioning units is required, to serve the office accommodation. It is proposed to install the 2 no. air conditioning units within the building envelope, so as to ensure there is no impact to residents. The units will be enclosed within a new acoustic plant room at the eastern corner of the basement, with extract vents and louvres into the existing basement level open-air plant area used for the residential accommodation, above.
- 5.27 The installation of plant equipment in this location will not have a detrimental impact on any neighbouring residential properties, in accordance with Policy A1 of the Local Plan.

Access, Car Parking, Highways and Servicing

- 5.28 The application proposes the conversion of an existing redundant residential car-park, albeit the number of allocated/leased car parking spaces for the residential accommodation will remain unaltered, as 2 no. parking spaces will be re-provided on the ground floor. The re-use of existing car parks in the Borough is supported by Policy T2 of the Local Plan, to support the efficient use of buildings and land, and promote sustainable methods of transport.
- 5.29 The site is sustainably located, within very close proximity to both Farringdon and Chancery Lane railway stations, together with a number of bus stops serving local destinations. In addition, there are two Santander Cycle Docking Stations within 5 min's walk of the site, providing a range of sustainable transport options for future occupiers of the site.
- 5.30 By way of the proposals, 7 no. long-stay and 2 no. short stay cycle parking spaces will be provided within the basement, with access to the street via a suitably-sized lift. Changing and showering facilities are also proposed, as well as lockers. No car-parking for the office use is proposed by way of the application.
- 5.31 The surrounding pedestrian and cycle infrastructure is also well-established and all footways are lit.

- 5.32 As such, the proposed development supports sustainable transport by prioritising walking, cycling, and public transport, including providing accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3). Therefore, the development accords with Policy T1 of the Local Plan and Policy 6.9 of the London Plan.
- 5.33 Pedestrian access to the site will almost exclusively be taken from the new glazed entrance on Saffron Hill, whilst level access and access for cyclists will be provided via St Cross Street. Accordingly, the new development will ensure safe, accessible and convenient access for all, in accordance with Policy 7.2 of the London Plan.
- 5.34 The existing access point to the residential accommodation above will remain entirely unaltered by way of these proposals, resulting in the residential and commercial uses being kept separate, as far as practical. Internal access for residents to their existing refuse storage and ground floor car park will also be retained.
- 5.35 Having regard to Policy CC5 of the Local Plan, the development incorporates provision for 2 no. 660L bins, in a secure locked storage area. It is proposed that 1 no. bin will be utilised for general waste, and the other for dry recyclables (including paper, plastic, metal, cardboard and glass). Given the nature of the use proposed, it is not deemed necessary to provide storage for food waste.
- 5.36 Refuse and recycling will be stored separately within the kitchen area of the new office, and transported to the bin storage area every evening.
- 5.37 It is anticipated that refuse and recycling will be collected once per week, and that the collection vehicle will pull up alongside the St Cross Street entrance which is located only 8 metres from the refuse storage area, and has level access, to enable the containers to be easily manoeuvred, as per the existing arrangement.
- 5.38 Accordingly, the proposed servicing arrangements will comply with Policy CC5 of the Local Plan (2017).

Energy and Sustainability

- 5.39 The application submission is accompanied by an Energy & Sustainability Statement, along with a BREEAM Pre-Assessment, as required by Policies CC1 and CC2 of the Local Plan.
- 5.40 The BREEAM Pre-Assessment discusses the option of a 'realistic' BREEAM score and a 'potential' BREEAM score, as opposed to a prescribed BREEAM rating target. The Pre-Assessment Tracker demonstrates if the assessment was undertaken as the project is, a BREEAM rating of 'Pass' could be achieved, however additional credits could be added on to reach 'Very Good' although some of

the credits would likely not add to the sustainability value of the project and would be part of a “box ticking” exercise.

- 5.41 The Pre-Assessment review found that achieving BREEAM Excellent would be realistically impossible to achieve on a project of this nature, given that it seeks a change of use, and the large proportion of the existing building fabric will be retained.
- 5.42 Accordingly, due to the scope of size and scope of the works, it is not recommended that BREEAM ‘Very Good’ is key target; however, the priority will be on maximising sustainable features and bringing tangible value rather than spending money on specific items simply to achieve BREEAM credits.
- 5.43 Notwithstanding, the accompanying Energy & Sustainability Statement provides further commentary on the measures proposed to ensure the sustainability of the building.
- 5.44 Fundamentally, the reuse of an existing building for employment development is considered to be the primary benefit, as the majority of waste and energy required with demolition and construction of a new building will be avoided.
- 5.45 Energy efficient lighting and equipment will also be utilised alongside water efficient fittings and appliances.
- 5.46 The building will also achieve a 15.70% reduction in regulated CO₂ emissions over the Part L2A:2013 baseline.
- 5.47 Accordingly, given the apparent site constraints, the development will meet the highest feasible environmental standards, including reducing carbon dioxide emissions, minimising the need to travel by car, supporting energy efficiency improvements to the existing building; and, optimising resource efficiency. As such, the development will accord with the provisions of Policies CC1 and CC2 of the Local Plan.

6. SUMMARY AND CONCLUSIONS

6.0 This application proposes the change of use of an existing lower ground floor car park located on the corner of Saffron Hill and St Cross Street, to provide 587.6 sq. m of new office floorspace (Class B1a).

6.1 The proposed change of use accords with Local, Regional and National planning policy, as it will support the delivery of a new business within a sustainable location and make efficient use of an existing building,

6.2 The conversion of the existing redundant car park has previously been found to be acceptable to the Council, and we do not consider there to have been any change in circumstances which would preclude a change of use being acceptable again in principle.

6.3 Furthermore, this planning statement has specifically shown that:

- The principle of office development within the CAZ and Hatton Garden Area is acceptable, as the proposal does not include the loss of any floorspace for use by the jewellery industry. Indeed, the proposal is expected to support the jewellery industry of Hatton Garden by providing increased footfall in the area;
- The proposal will be compatible with the surrounding area, which is principally comprised of office uses at basement and ground floor levels;
- The development accords with Policy T2 of the Local Plan (2017) which seeks the productive reuse of redundant car parks;
- The proposal will support the delivery of a new business for circa 50 employees, and result in inherent benefits for surrounding businesses;
- The proposed external alterations associated with the change of use will be sympathetic to the character and appearance of the area, and have a neutral impact on the overall character of the Hatton Garden Conservation Area;
- The site is sustainably located and will promote travel through a range of sustainable methods, including walking and cycling;
- The development will be car-free and not cause any detrimental impacts to the highway network;
- Suitable servicing and delivery arrangements have been incorporated into the design, which also encourage recycling; and
- The refurbishment will incorporate the highest feasible and practical environmental standards, and reduce carbon dioxide emissions through following the steps in the energy hierarchy.

6.4 In light of the above, we conclude that the development should be acceptable to the Council.

6.5 Accordingly, we look forward to receiving your confirmation that the application has been registered, and subsequently approved.

APPENDIX A1: SITE LOCATION PLAN

Da Vinci House, 44 Saffron Hill, London, EC1N 8FH



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