

OC/JD/P6880
08 January 2018

London Borough of Camden
Regeneration and Planning
5 Pancras Square
London
N1C 4AG

Planning Portal reference: PP-06639644

Dear Sir/Madam,

1 Lily Place and 39 Saffron Hill, London, EC1N 8YJ
Demolition of existing mansard and erection of a sheer third floor and modern mansard to 39 Saffron Hill and single storey flat roof extension to 1 Lily Place with communal roof terrace to provide three additional residential units (Use Class C3). Internal re-configurations, replacement windows and alterations to ground floor entrances.

On behalf of the Applicant, H Company 3 Limited, we submit a full planning application for:

'Demolition of existing mansard and erection of a sheer third floor and modern mansard to 39 Saffron Hill and single storey flat roof extension to 1 Lily Place with communal roof terrace to provide three additional residential units (Use Class C3). Internal re-configurations, replacement windows and alterations to ground floor entrances.'

The following documents have been submitted via the Planning Portal in support of the application:

- Application Form
- CIL Form
- Studio Kyson Planning Application Brochure (November 2017)
 - Site Location Plan
 - Block Plan
 - Existing and Proposed Plans
 - Design and Access Statement
- Daylight and Sunlight Report (December 2017); prepared by Delva Patman Redler
- BREEAM Report (November 2017); prepared by Eight Associates

The application fee of £1,155.00 has been paid separately by the applicant.

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Site Location and Description

The site is located on the eastern side of Saffron Hill, a north-south road which runs parallel to Farringdon Road and Kirby Street. The site is also close to the border with the London Borough of Islington and the City of London. The area is principally known for Hatton Garden, a jewellery quarter and key centre for the UK diamond trade.

The Local Plan places the following designations on the site:

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

There are no statutorily listed buildings in proximity to the site. The Hatton Garden Conservation Area Appraisal and Management Strategy (2017) does not identify the site (1 Lily Place and 39 Saffron Hill) as making either a positive or negative contribution to the area.

The site is in close proximity to Farringdon and Chancery Lane station and multiple bus routes are serviced in the area principally from Farringdon Road. The site's central location places it in proximity to employment, social and commercial amenities. Accordingly, the site is highly accessible and can accommodate sustainable development designated with a Public Transport Accessibility Level (PTAL) of 6b (Best).

39 Saffron Hill is a yellow/brown London stock brick building with white sash windows. It is a simple design with no particular architectural feature of interest. The property comprises a basement, ground, first and second floors and a mansard roof with dormers. The basement operates under Use Class B1. The ground and upper floors operate under Use Class C3.

1 Lily Place sits behind 39 Saffron Hill and shares the same access core. The ground floor of 1 Lily Place is access core only, with the upper floors located above the rear office accommodation of 57A Farringdon Road; also under the applicant's demise. The upper floors are comprised of a first and second floor under Class C3 residential use. At ground floor level, it is a very plain brick structure painted white. The upper floors visible from Saffron Hill are in a similar yellow/brown London stock brick with six and twenty pane windows. The northern elevation has a light industrial composition finished with critall windows and white glazed brick, while the eastern and southern elevations are plain yellow/brown London stock brick. The property has a large flat roof and a roof light.

In total, the site hosts 42.1 sqm of office accommodation and 8 residential units comprised of 2x1B2P, 2x2B4P and 4x3B5P. 3 of the three bedroom units do not meet the London Plan minimum space standards; all other units do meet the space standard. There are no formalised waste/recycling or cycle storage areas nor are there any communal or private amenity space areas.

There is limited planning history recorded for the site with only a certificate of lawful existing use issued on the 11th January 2000 confirming the use of seven self-contained flats within the property (LPA ref: PS9905230). The application did not concern the ground floor flat, which is the eighth unit.

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Proposal

The development proposal is described:

‘Demolition of existing mansard and erection of a sheer third floor and modern mansard to 39 Saffron Hill and single storey flat roof extension to 1 Lily Place with communal roof terrace to provide three additional residential units (Use Class C3). Internal re-configurations, replacement windows and alterations to ground floor entrances.’

The existing mansard roof at 39 Saffron Hill will be demolished and a modern sheer third floor and mansard will be constructed. At the rear of the site, at 1 Lily Place, a single storey flat roof extension will be constructed, with shared communal amenity space at roof level. The two properties are connected by an existing core accessed from 1 Lily Place; this will be extended by a single storey and a small lift inserted. The development will provide three additional residential units (Use Class C3). The new build GIA totals 327.5 sqm.

The extension at 1 Lily Place will continue the existing rear industrial design, constructed from white glazed brick with black crittal style windows. The mansard extension to 39 Saffron Hill will be a modern design, clad in bronzed anodised aluminium shingles with fully glazed windows. The core will be extended to match the existing London stock brick.

The extension will be part of a wider refurbishment of the property and enhancement to the residential accommodation. There is presently no formal cycle storage, no formal refuse and recycling storage and no communal or private amenity space. The development will address these issues by altering the existing ground floor flat (Flat 1) to provide a refuse and recycling storage area and 14 secure cycle storage spaces (2 short and 12 long stay cycle spaces). 104 sqm of communal amenity space for all units, existing and proposed, will be provided on the roof of the 1 Lily Place extension. Separate refuse storage at ground floor level, also accessed from Lily Place, will be provided for the existing basement office accommodation.

In addition to the alterations to Flat 1, Flat 6 and Flat 8 will also be altered to remove the existing mezzanine floors and rationalise the floorplates. In total the site will host 11 residential units comprised of 6x 1B/2P, 3x 2B/4P and 2x 3B/5P. All new or altered residential units will comply with the London Plan minimum space standards, which is not presently the case.

A comparative schedule of accommodation is tabled below:

Flat No.	Existing Bedrooms	Existing Sqm	Proposed Bedrooms	Proposed Sqm
1	3 bed / 5 person	78.1	1 bed / 2 person	54.4
2	3 bed / 5 person	80.0	3 bed / 5 person	80.0
3	1 bed / 2 person	59.9	1 bed / 2 person	55.3
4	2 bed / 4 person	83.2	2 bed / 4 person	83.2
5	3 bed / 5 person	80.3	3 bed / 5 person	80.3
6	2 bed / 4 person	71.2	1 bed / 2 person	56.8
7	1 bed / 2 person	50.0	1 bed / 2 person	50.0
8	3 bed / 5 person	86.4	2 bed / 4 person	81.6
9	N/A	N/A	1 bed / 2 person	50.9
10	N/A	N/A	1 bed / 2 person	53.2 (+7.4 of private amenity space)
11	N/A	N/A	2 bed / 4 person	81.6

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Planning Policy Considerations

Land Use

The development proposes the addition of three Use Class C3 residential units. Self-contained housing is the priority land use of the Camden Local Plan, as per Policy H1. The draft London Plan (2017) echoes this priority with a '*presumption in favour*' of small site housing proposals as stated under Policy H2 detailing that '*smaller sites should play a much greater role in housing delivery and boroughs should pro-actively support well designed new homes on small sites*'.

The site is located within the Hatton Garden policy area. As described under policies H2, E1 and E2 of the Camden Local Plan, the priority within the policy area is development which supports the jewellery sector; particularly its manufacture and trade (3.48). Despite the policy preference towards the support of the jewellery sector, it is considered to be inappropriate to seek such a use as an extension to this building. Saffron Hill does not have a 'trading' character, with the main retail stores located along Hatton Garden (the street) itself. The shared core and presence of existing residential makes it inappropriate both from an amenity and security perspective to locate manufacturing or supporting offices alongside the existing residential. In the context of the site, it is therefore considered inappropriate to seek the provision of uses to support the jewellery sector and that the provision of additional residential uses should be supported. The principle of the land use is therefore considered to be fully supported in this proposal.

Unit Mix

The development alters the unit mix of the existing units and provides three additional units on site. Concerning the existing unit mix, the proposals will reduce the ground floor Flat 1 3B5P unit to a 1B2P unit, Flat 6 on the second floor will reduce from a 2B4P to a 1B2P unit and Flat 8 will reduce from a 3B5P to a 2B4P. The reductions to the unit sizes are considered justified for the following reasons:

Flat 1: This unit falls 7.9 sqm below the London Plan space standards and as per Policy H6 of the Local Plan it is expected that all self-contained homes meet the nationally described space standards. The alterations to Flat 1 are also particularly important as this enables the provision of dedicated recycling/waste and cycle storage; encouraged in housing developments and not currently provided for at the site. The provision of this storage benefits all housing at the site.

Flat 6 and 8: Both of these units have a bedroom contained at mezzanine level, retention of which would prevent implementation of the additional or reconfigured units. The reduction to the size of these units in order to facilitate the creation of 3 additional units is considered to be supported given the clear priority to provide more housing within the borough. While the development loses the 'high priority' 3 bedroom home of Flat 8, this becomes a 2 bedroom unit which is also classed by the council as being a 'high priority'.

We therefore consider that there is a strong justification for the change to the existing unit sizes in order to facilitate an increase in housing units on site and improve the quality and amenities of all units; existing and proposed.

Daylight/Sunlight

The proposals have been designed with a key focus on the sunlight/daylight envelop available to the

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site which is explored within the submitted Kyson design pack. A daylight sunlight study has been submitted using all the assessment criteria available under BRE Guidance. Under VSC assessment, 39 of the 41 assessed rooms fully comply with the BRE Guidelines. Of the two rooms which fall shy of the guidance, within 41-43 Saffron Hill, these rooms service kitchens and the report raises no material harm will be caused to these properties. Under NSL assessment, 36 of 41 rooms comply with guidelines in Daylight Distribution terms. 3 of the 5 rooms which fall below the guidance serve bedrooms which are predominately occupied at night times. Overall the report is satisfied of no material harm under NSL testing. Under ADF testing the report confirms that all rooms assessed fully comply with the BRE guidelines. Under APSH assessment, 13 of 15 windows fully comply with BRE Guidelines. Of the 2 windows which fall short, these serve living rooms with 2 other windows giving them triple aspect views. The report therefore concludes that the development will not give rise to any particular daylight/sunlight concerns and that the development should be supported on daylight/sunlight grounds. The development is therefore considered supported by Local Plan Policy A1.

Amenity

As described above, the proposed development creates no significant daylight/sunlight issues. Concerning the potential for visual privacy and overlooking, the proposed windows at third and fourth floor level at 39 Saffron Hill overlook the single storey building of 111-115 Saffron Hill. The windows facing Da Vinci House, along Lily Place, are located in the same position, which is offset, as the existing mansard windows meaning therefore there will be no change over the existing situation. The rooflights do not offer the ability to overlook or be looked into. On the Lily Place extension, the nearest residential windows on the northern elevation are approximately 25 metres away and therefore pose no overlooking risk, the eastern elevation is understood to comprise of non-residential windows and the southern elevation is also understood to be non-residential windows with the proposed windows also offset against these. The proposal will therefore raise no overlooking concern and is therefore compliant with Local Plan Policy A1.

The site has no existing private or communal amenity space. The development will provide 104 sqm of communal amenity space and unit 10 can be provided with a private amenity area of 7.4 sqm. This is a positive enhancement to the site and the quality of residential accommodation.

Design

The proposed extensions are appropriate in relation to the surrounding built form. The majority of surrounding buildings are between five-to-six storeys in height; these buildings also carry a greater massing and bulk than the application site. The extension fits comfortably within the local skyline. No issues are raised as to the Designated View: 2A.1 Parliament Hill summit to St Paul's Cathedral. As described above, the design of the extension has been strongly influenced by the sunlight daylight envelop.

Saffron Hill comprises a mix of building ages, predominantly of post-war style, although to the south and east of the site is Victorian and Edwardian style buildings. This mixture of styles has added a wide variety of materials and styles to this part of the conservation area.

The extension to 1 Lily Place has been designed as a continuation of the industrial character of the existing building, proposing glazed white bricks and crittel style windows. Developing on the existing design, the extension to 1 Lily Place is considered appropriate to the rear of the site and the

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character of the conservation area. The extension to 39 Saffron Hill is a modern interpretation of a metal-clad mansard roof. It will be clad in bronze anodised aluminium shingles reflecting the pallet of materials and industrial history of the area. The extension fits comfortably within the prevailing streetscene and adds a modern addition to the architectural layers of the street.

A small lift will be accommodated within the core. Due to site constraints it is not possible for this to meet Part M standards however it is still an improvement on the existing providing step-free access to all units except Flat 5. Access to Flat 1 will also be step-free which it currently is not. The development is considered to be supported by Local Plan Policy D1 and D2.

Transport

The site is located in a highly sustainable area with a PTAL rating of 6b(Best). The draft London Plan under Policy T6.1 seeks car-free development in this part of London, which is the proposal. The development provides for 14 cycle spaces in total, an improvement on the 0 currently provided for. While this does marginally fall below the London Plan standards for the site as a whole, it exceeds in unit up-lift terms, is an enhancement on the existing situation providing at least one space for each unit, and is all that is reasonably possible within the constraints of the existing building. Further increasing the size of this store would only reduce Flat 1 below London Plan standards and would not be an appropriate response in balancing cycle spaces with unit sizes. On balance the proposal is considered to be supportable in transport terms and an improvement on the existing situation in accordance with Policy T1.

Sustainability

The proposals will accompany a refurbishment of the property. As per the submitted BREEAM Domestic Refurbishment Assessment, the development scores a 'Good' rating, at 49.16%, exceeding the score of 45% required by the London Borough of Camden. The development is located within a highly accessible area and is an extension to an existing building. The development is considered to be sustainable and presumed in favour of development as described in paragraph 14 of the NPPF.

Summary

The proposed development is described as demolition of the existing mansard and erection of a sheer third floor and modern mansard to 39 Saffron Hill and single storey flat roof extension to 1 Lily Place with communal roof terrace to provide three additional residential units (Use Class C3). Internal re-configurations, replacement windows and alterations to ground floor entrances.

The development has been carefully designed to fit the physical constraints of the site and provides a modern and sympathetic addition to the conservation area. The provision of additional residential units is strongly supported and these are provided in a central and highly sustainable location. The development is considered to be supported by national, strategic and local planning policies.

We trust you have all the information required to validate and determine the application and we look forward to a swift and positive outcome. Should however you require anything further please do not hesitate to contact the undersigned.

Yours sincerely

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Oliver Coleman

For and on behalf of
Rolfe Judd Planning Limited

Cc	S. Payne	H Company 3 Limited
	A. Bard	H Company 3 Limited
	K. Watts	Kyson