



Date: 04/09/2017
Our ref: 2017/3766/PRE
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By email

Dear Mr Cassidy,

Re: White Bear Yard, 144a Clerkenwell Road, EC1R 5DF

Thank you for submitting a pre-planning application enquiry for the above property which was received on 04/07/2017 together with the required fee of £3,654.00.

1. Drawings and documents

P01 rev P1, P02 rev P1, L01 rev P1, and Feasibility Study/Pre-application document dated June 2017.

2. Proposal

New double height office reception at ground floor level accessed from Back Hill; New 3-storey commercial units on the lower ground, ground and upper ground floors fronting onto Herbal Hill; Plant / Storage in basement; Refurbished office space on 1st - 4th floors; Erection of extension at 5th & 6th floors comprising B1a and C3 residential floorspaces fronting onto Herbal Hill.

3. Site description

The site includes 7-9 Back Hill which is a brick 4 storey 1920/30s building (with modern glazed rooftop extension) facing on to the street, and 144a which sits within and upon the footprint of White Bear Yard. 144a is finished in white render and was constructed at a similar time as 7-9 Back Hill. The building is predominantly 3 storeys; however, a fourth storey attaches itself to the extension facing on to Back Hill. A small rooftop extension sits to the rear and allows for access to the terrace at roof level from the internal staircase. The buildings have two entrances, one from the small street on White Bear Yard and one on Back Hill.

Historically, White Bear Yard has seen substantial changes including access to it, the roads surrounding it, and its built form.

The site sits within Hatton Garden Conservation Area. 144 Clerkenwell Road (not included within the proposals) sits adjacent to White Bear Yard on a prominent corner location. It addresses the awkward street corner reflecting the historic creation of new roads. This building along with 136-142 (opposite corner) are identified as positively contributing to the character and appearance of the Conservation Area.

Please note the Hatton Garden Conservation Area Appraisal has been updated and a draft consultation strategy is available.

4. Relevant planning history

2016/0423/P - Retention of 5 x air conditioning units at roof level. Certificate of lawfulness approved 17/03/2016.

PS9904615 - The erection of a flue and the insertion of louvred panels in the existing fenestration. Granted 14/08/1999.

PS9904663 - Certificate of lawfulness application for an existing use of first, second and third floors as offices (Class B1, a-c only). Certificate granted 10/08/1999.

PS9904097R2 - The erection of a roof extension and alterations to the Back Hill elevation. Granted 23/04/1999.

PS9804534 - External alterations to Clerkenwell Road/White Bear Yard elevations to provide new glazed entrance canopy and fenestration. Granted 03/08/1998.

PS9805051 - External alterations to existing fenestration and entrance doors. Granted 18/12/1998.

8700212 - Alterations to ground floor elevations to White Bear Yard. Granted 18/03/1987.

M16/40/B/25520 - Erection of an external steel spiral staircase in rear light well to provide secondary means of escape. Granted 03/02/1978.

5. Relevant policies and guidance

[National Planning Policy Framework 2012](#)

[The London Plan March 2016](#)

[Camden Local Plan 2017](#)

Policy A1 Managing the impact of development

Policy A4 Noise and vibration

Policy D1 Design

Policy D2 Heritage

Policy H1 Maximising housing supply

Policy H4 Maximising the supply of affordable housing

Policy H6 Housing choice and mix

Policy H7 Large and small homes

Policy T1 (Prioritising walking, cycling and public transport)

Policy T2 (Car-free development and limiting the availability of parking)

Policy T4 (Promoting the sustainable movement of goods and material)

[Camden Planning Guidance](#)

CPG1 (Design) 2015

CPG2 (Housing) 2016

CPG6 (Amenity) 2011
 CPG7 (Transport) 2011
 CPG8 (Planning obligations) 2015

Hatton Garden Conservation Area Statement 1999

Draft Hatton Garden Conservation Area Appraisal and Management Strategy 2017

6. Assessment

The principle considerations are considered to be the following:

- Design (impact of the proposals on the character and appearance of the host building and wider Hatton Garden conservation area);
- Land use – creation of residential dwellings;
- Standard of residential accommodation;
- Affordable housing
- Amenity (impact on neighbouring amenity in terms of outlook, daylight, privacy and noise); and
- Transport

7. Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Camden's Development Policies Document is supported by CPG1 (Design) and CPG6 (Amenity), as well as the Hatton Garden Conservation Area Statement.

Although the context here is varied and many past uses have been lost, there is a strong presence of industrial warehouse buildings historically used for storage and manufacture and it is important to retain reference to this. The existing detailing and construction of these buildings are important and should be celebrated and enhanced with any scheme. These are what contribute to the special character and appearance of the conservation area and any new proposal should seek to preserve or enhance this.

As detailed above there are two buildings near to the proposed site which are identified as positive contributors to the conservation area. The historical assessment should discuss these and any proposals should have a positive impact on them and not detract from their setting. It is also important to understand the importance of the views in this area. They are heightened due to the length of roads and the typography, and as with any scheme, these views should be understood and the impact of the proposals upon them be established and clearly demonstrated.

New entrance on Back Hill

As highlighted at the Council's internal Design Review Surgery, the elevation fronting Back Hill is important, with its strong warehouse/industrial language. This should be retained and enhanced. It is suggested that if a more prominent entrance is required, it should incorporate the existing features and detailing. The white banding to this elevation is an important architectural feature and should be retained; however, the opening at first floor level could be kept to allow lighting in to the open ground floor space (with or without the glazing). Landscaping, materiality and permeability are also important here, and should reflect the former industrial and trade use. It is also important to understand if new lighting and signage (and shutters/gate/grilles) are to be incorporated within this area, and if so, should reflect the existing character. It is recommended that full details of the above should be submitted alongside any formal submission.

Proposed roof extensions

It is important that hierarchy, views, spaces and details between buildings are explored and understood and retained within any proposal. Existing corners, details and flank walls of adjacent properties should be clearly read and any new scheme should incorporate these. It is considered that the existing storey with its white projecting canopy sits sensitively within this context and upon its host building. The visual prominence of the proposed two storey extension is far greater due to its substantial bulk, which dominates the host building and those surrounding, and raises concerns. If a second storey is to be accepted it should appear subordinate and be set back, and potentially be finished in a different material. Photomontages of views with the additional storeys (with wire lines if the new cannot be seen) should be completed to clearly identify their impact – especially up and down Back Hill and from Clerkenwell Road.

Roof extension to rear of building

The rear has very little visibility within and out of the CA; however, an elevation should be prepared to understand the view from Clerkenwell Road into White Bear Yard and to appreciate the visual appearance and how it works with the existing building and those surrounding it. Generally, in principle (subject to detailing and materials) this is likely to be acceptable. If there is a chance to improve the permeability in this area, that would be seen as an enhancement. If any new lighting or signage is proposed, this should be identified/assessed as part of the full application.

The following details would need to be secured via condition if not submitted with the full application:

- Historical Assessment/Report –impact assessment
- Grilles/gates/shutter for frontage
- Signage
- Lighting
- Surface treatment to back hill – reference historic access?
- Materials (samples) of new construction
- Window details – manufactures spec (1:10, 1:1 etc.)

8. Land Use

Business use

The proposal includes the erection of a part single, part double storey extension at roof level. The floor plans show the new third floor as providing floorspace for a showroom, whilst the fourth floor would provide 3 x new residential dwellings and a large terrace area.

The existing floors below (currently in office (B1a) use) would be split into office, showroom, and teaching floorspace as follows:

Lower ground: teaching seminar space 437sqm

Ground: office space 221sqm office and showroom space 141sqm

First = office space 227sqm and showroom space 205sqm

Second floor = office space 227sqm and showroom space 205sqm

Third floor = showroom space 297sqm.

Whilst on site, I was informed that the show rooms would be visited by appointment only, and therefore were considered to be ancillary to the main office use. However, based on the floor areas outlined above, the new showroom floor space (848sqm) and teaching space (437sqm) would exceed the retained office floor space (675sqm). It is therefore likely that the proposed development would constitute a change of use and result in a loss of office floor space. Policy E2 (Employment premises and sites) seeks to protect premises or sites that are suitable for continued business use, in particular premises for small business such as this site, unless it is demonstrated to the Council's satisfaction that the site is no longer suitable for its existing business use. The loss of office space is therefore unlikely to be supported unless thoroughly justified, or the amount of showroom/teaching floorspace is reduced.

Housing

The proposal includes the creation of 3 residential flats within the new 5th storey. Housing is regarded as the priority land-use of the Local Plan, and the Council will make housing its top priority when considering the future of unused and underused land and buildings.

Based on the information submitted, the proposals show an increase in floorspace of approximately 550sqm. In the Central London Area where more than 200 sqm (gross) additional floorspace is provided, we will require up to 50% of all additional floorspace to be self-contained housing, subject to the following considerations:

- a. the character of the development, the site and the area;
- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:

- f. the need to add to community safety by providing an active street frontage and natural surveillance;
- g. the extent of any additional floorspace needed for an existing user;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Despite requesting additional information about the layout and arrangement of the new flats by email on 23rd August, I have not heard back. It is therefore unclear whether the 3rd floor terrace and 'kitchen/breakout area are for the use of the new flats or the office floor space below, and consequently, the amount of residential floor space provided by the development.

Based on the plans provided, the development seems to provide approximately 131sqm of residential floor space. This therefore would not meet the requirements of Policy H2, which would require 275sqm residential floorspace (50% of 550sqm).

Unit size mix

The Local Plan has identified that both 2 bedroom and 3 bedroom market dwellings are the highest priority, whilst 1 bedroom and 4+ bedroom units are lower priority. Nevertheless, the Council acknowledges that there is a need and/ or demand for dwellings of every size and would expect most developments to include some homes that have been given a medium or lower priority level.

The proposal includes the creation of 3 studio flats which are a lower priority. In addition, each unit seems to be severely below standard in terms of internal floor area (see section below for full assessment) and therefore, it is suggested that the proposals are revised to provide one larger 2 or 3 bedroom dwelling. Alternatively, if the overall residential floor space is increased as would be required by Policy H2, there would be scope to provide 2 or 3 larger dwellings which would be more acceptable in policy terms.

9. Standard of accommodation

The Council expects development to provide high quality housing that provides secure, well-lit accommodation with well-designed layouts and rooms in accordance with guidance provided by CPG2 (Housing). The London Plan 2016 sets out new [Nationally Described Space Standards](#) which all new dwellings, including conversions of existing buildings, must meet.

For a single storey, 1 person studio flat, the minimum gross internal floor area must exceed 39sqm. All three units are well below this (ranging between 22 to 27sqm), and are not considered acceptable. It is recommended that the layout is revised to provide dual aspect

accommodation to ensure acceptable daylight and ventilation, with adequate internal storage for each unit.

I cannot provide a full assessment of the acceptability of these units due to a lack of detailed drawings (sections, etc.), and no information regarding what areas on the 3rd and 4th floor these flats would have access to. The drawings show the existing fire escape stairs will be extended to the new residential floor, but it looks as though for their main access, the new residential occupiers would have to share the stair/lift with the office use on the floors below which is unlikely to be considered acceptable.

10. Affordable Housing

The Local Plan sets out requirements for the provision of affordable housing within new residential developments. Policy H4 will seek to secure a contribution to affordable housing from all developments that include housing and provide one or more additional homes. Targets are based on an assessment of development capacity whereby 100 sq m (GIA) of housing floorspace is generally considered to create capacity for one home. Targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace.

A sliding scale target will apply to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.

If the proposal results in an uplift of residential floorspace over 100sqm, it is likely that the Council would seek a contribution towards affordable housing for this development.

11. Amenity

Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.

The nearest residential dwellings are at 2 Eyre Street Hill to the west and approximately 30 flats within 1-10 Summers Street to the north.

There is concern about the impact of the development on the amenity of occupants of 1-10 Summers Street in terms of outlook and daylight. Although a right to light assessment has informed the pre-app proposals, this issue would need to be fully assessed by a daylight/sunlight report to check the development would comply with BREEAM standards. The proposed extension would sit just a few metres away from the south-facing windows of these apartments and is likely to have a significant impact on daylight, sunlight and outlook. No development would be found acceptable unless it was fully demonstrated that the works would not result in detrimental impacts upon these neighbouring residents.

It would also need to be demonstrated that users of the large outdoor terrace wouldn't be able to look into neighbouring windows. Although privacy screens could overcome this, they may result in additional harm themselves, by blocking daylight into neighbouring windows and as such should be fully detailed upfront.

Replacement/Installation of plant

Limited details have been provided, but whilst on site the proposals to upgrade and consolidate the existing plant was discussed. Development involving the installation, alteration or replacement of plant, ventilation, extraction or air conditioning equipment, will require a noise, vibration and ventilation assessment to be submitted with your planning application. This should include the following information:

- existing background noise levels measured over a 24-hour period (including the cumulative noise levels of all existing units)
- proposed background noise levels (including the cumulative noise levels of all proposed units)
- any proposed measures to reduce noise, fume emissions and vibration
- the system manufacturers specification of the proposed equipment to be installed, altered or replaced
- details of the method used to compile the report and examples of the calculations and assumptions made.

The noise impact assessment must demonstrate that the new plant would comply with Camden's noise standards (policy A4) which state that the external noise level emitted from plant, machinery or equipment shall be lower than the lowest existing background noise level by at least 5dBA, or by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises (with all machinery operating together at maximum capacity).

If this is not achievable, then the Council would expect suitable noise attenuation measures to reduce the noise levels of the proposed plant. Details of any necessary mitigation measures should also be supplied with the full planning application.

12. Transport

Cycle parking

Local Plan Policy T1 requires development to provide cycle parking facilities in accordance with the minimum requirements of our cycle parking standards and in accordance with the minimum requirements of the London Plan.

Cycle parking provision should be provided with convenient access to street level and must be secure and easy for everyone to use. In order to meet London Plan's minimum cycle parking requirement, the development must provide 1 long stay space per 90sqm and 1 short stay space per 500sqm. Because the whole building would be renovated, and new users occupying it, the Council would likely seek cycle parking spaces for the whole building rather than the uplift. Therefore, based on a total floorspace of 2,520sqm, 28 long stay spaces and 5 short stay spaces would be required.

Their detailed design met Camden's parking standards (see CPG7 – Transport). The Council recommends Sheffield style stands or Josta two-tier cycle parking as opposed to vertical parking systems which are not easily accessible.

No cycle parking spaces have been provided on the drawings submitted, and the proposals would therefore be considered unacceptable in this regard.

Car parking

Policy T2 of the Local Plan states that all new developments in the borough are to be car free. Because the proposal results in new residential dwellings, the Council would require these to be car-free, secured as a Section 106 planning obligation.

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

The application site is highly constrained, and surrounded by other office and residential buildings. The Council's 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. A Construction Management Plan (CMP) would therefore be secured as a Section 106 planning obligation.

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 [here](#).

A financial contribution would need to be secured to cover the costs of reviewing the Construction Management Plan (these fees are under review and will be confirmed at application stage). This would also need to be secured by a Section 106 planning obligation if planning permission is granted.

Some highway licences would be required to facilitate the proposed works. You 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 [here](#).

Highway and Public Realm Improvements directly adjacent to the site

Policy A1 states that "Development requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces."

If the proposed works were considered likely to result in damage to the adjacent highway, the Council would seek to secure a highway works contribution as a Section 106 planning obligation if planning permission is granted.

13. Sustainability

Developments involving 500sqm or more increase in gross internal floor area (GIA) are required to submit an energy and sustainability statement. The energy statement must demonstrate how carbon dioxide emissions will be reduced in line with the energy hierarchy (Be Lean, Be Clean, Be Green). The statement should address sustainable development principles, including how these principles have contributed to reductions in carbon dioxide emissions (more advice is provided at paragraphs 2.6 to 2.10 of CPG3 (Sustainability), including what to include in your energy statement.

Currently, the Council expects a 35% reduction in carbon dioxide emissions below Part L 2013 Building Regulations – any remaining that can't be met on-site can be offset through a financial contribution to secure delivery of carbon dioxide savings in the borough. The contribution is £2,700 per tonne (over 30 years).

The sustainability statement must demonstrate how the development mitigates against the causes of climate change and adapts to climate change (please see chapter 9 of CPG3), and the development will need to be designed in line with BREEAM. Policy CC2 (Adapting to climate change) expects non-domestic developments of 500sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.

14. Conclusion

Although the principle of a two storey roof extension is likely to be considered acceptable, there are concerns regarding its detailed design and impact on neighbouring amenity, which would need to be fully explored and assessed prior to the submission of a full application.

It is important that a Historical Assessment be completed to understand the development of the area, the urban grain, its character, building materials and detailing. Historic photos/maps could help to better inform any proposals.

Should the client intend to further pursue the proposed development, it is recommended that further pre-application advice is sought prior to a formal submission.

15. Planning application information

If you submit a planning application which addresses the outstanding issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – full planning application
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled ‘existing’ and ‘proposed’
- Roof plans at a scale of 1:50 labelled ‘existing’ and ‘proposed’
- Elevation drawings at a scale of 1:50 labelled ‘existing’ and ‘proposed’
- Section drawings at a scale of 1:50 labelled ‘existing’ and ‘proposed’

- Design and access statement (including historical assessment)
- Noise impact assessment
- Energy & sustainability statement
- Sample photographs/manufacturer details of proposed materials
- The appropriate fee
- Detailed drawings outlined in section 7
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined by Development Control Committee as it would be a minor development that would result in the creation of more than 500 sqm of non-residential floorspace.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Laura Hazelton on the number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Laura Hazelton

Planning Officer
Planning Solutions Team