

30 April 2018

Laura Hazelton
London Borough of Camden

By email

Dear Laura

20-23 Greville Street, Camden

Statement on behalf of the Applicant to address Consultation Responses

The statutory consultation period in relation to application 2018/0910 ran from 15th March 2018 to 5th of April 2018. A total of 18 responses were received.

We would suggest that the responses can be grouped under the following key headings:

- Design and heritage;
- Construction works and impact on existing businesses;
- Impact on existing residential amenity;
- The consultation process; and
- Other issues.

In the following section we provide a summary of the key issues raised under each topic heading and our response.

1 Design/heritage

- 1.1 A number of the representations received refer to the proposed design of the building and its impact on the historic setting of Bleeding Heart Yard.
- 1.2 These representations have been received from Father Tom Deidun, Roger Felton, Robyn Wilson, Mark Hardwicke, Bernard Parker, Samjess Properties, Martin Robinson, James Perez, A.D. Hirschfield and H. Kaye.
 - 1.1 As acknowledged by Roger Felton, the design of the building will be an improvement to the existing '*dull and dated*' 1970s building. The building sits in Hatton Garden Conservation Area (CA). The CA Appraisal and Management Strategy (2016), which has been prepared in order to guide development in the area, identifies No.20-23 Greville Street as one of fifteen buildings which '*make a negative contribution... having a negative impact upon the character and appearance of the Area, for example because of inappropriate bulk, scale, height or materials, poor quality design or construction, or because they fail to address the street*'.
 - 1.2 In addition, the building contributes very little to the activation and animation of Greville Street, which is a key pedestrian thoroughfare, linking Farringdon Station to the Hatton Garden area.

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- 1.3 The existing building backs onto Bleeding Heart Yard, presenting a blank frontage, a void and three surface car parking spaces. The building therefore effectively turns its back on this historic space and undermines and detracts from the quality of the public realm in the vicinity of the Bleeding Heart Restaurant.
- 1.4 The proposals seek to overcome the negative aspects of the existing building by transforming entirely the relationship of the building to the streetscape, activating all elevations at ground level and acknowledging its presence within Bleeding Heart Yard through the filling in of the void space, the introduction of the colonnade, active frontages and the main office entrance and foyer.
- 1.5 The proposals increase the height of the building by one storey, with an internal mezzanine level, in a style which reflects the design intent for the building and which has been carefully considered in order to minimise any negative impact on the streetscene. The submitted heritage statement and Design and Access Statement (including the verified views within) show that this massing increase can be comfortably accommodated within the local townscape without detracting from the key local views up and down Greville Street.
- 1.6 As noted within the submitted Planning Statement, Camden Design Review Panel recognised at the pre-application stage that the proposals could “*result in an exceptionally high-quality building*”, praising the “*complex and sophisticated*” concept which could deliver a “*remarkable building*”.
- 1.7 The proposed façade treatment and distribution of uses creates the potential for the building to have a positive impact on the townscape, disguising and physically opening up the current building which at present pays little regard to its surrounding context. As a result, the proposals will both preserve and enhance the character and appearance of the conservation area.

2 Construction works impacts/Impact on local business

- 2.1 A number of representations received refer to impact on local business as a result of the negative impact of the construction works required to implement and deliver the application proposals.
- 2.2 These representations have been received from Father Tom Deidun, Paul Cutler, Len Markwell, Roger Felton, Robyn Wilson, W.G. Burnett, Mark Hardwicke, Samjess Properties, Stuart Rucker, Robert Wilson, Martin Robinson, James Perez, A.D. Hirschfield and H.Kaye.
- 2.3 A draft Construction Management Plan has been submitted in support of the application, which establishes the framework of measures that will be necessary to ensure safety and minimise disruption to the local road network during the construction stage, including a draft proposal for construction vehicle movements and routes, hours of construction work, hoarding details and wheel washing facilities. The details contained within this, and any other restrictions in relation to construction such as hours of working, will be secured by condition where deemed reasonable and appropriate by officers.

- 2.4 There is no reason why employees of nearby business should be 'severely impacted' by the proposal as suggested by Robert Wilson.
- 2.5 It is acknowledged that there would be some building work associated with the implementation of the proposal, as with any development scheme. However, this will be carefully managed and the end result will be an improvement to the appearance and public's interaction with Bleeding Heart Yard.
- 2.6 It is envisaged that the final CMP will be agreed with Camden officers post any decision and that the chosen contractor will be required to liaise with residents and businesses to ensure any potential harmful environmental and amenity impacts are minimised and are appropriately mitigated.
- 2.7 The comment from Jason (no surname provided), a local jewellery business owner, queries the success of the proposed jewellery market and proposes that space for the jewellery sector should be provided within the extended building. The reasons why jewellery industry workspace is not proposed within the extended building has been set out within the planning statement and further discussions are taking place with the Council on this basis.

3 Amenity Impact on existing residential properties and commercial premises

- 3.1 A number of representations received refer to impact on the amenity of local residents and businesses as a result of the works.
- 3.2 Robyn Wilson raises the issue of daylight and views from her home (No.7 Bleeding Heart Yard) and Bernard Parker raises the impact of light on neighbouring business as a result of development
- 3.3 A.D. Hirschfield comments that there would be an invasion of privacy and loss of light to the business located at No.7 Bleeding Heart Yard.
- 3.4 In terms of any potential impact on the privacy of the commercial premises at No.7 Bleeding Heart Yard we would confirm that the proposed new windows would be positioned in elevations which already feature elevated window openings and hence the existing cross-yard relationship with neighbouring buildings would remain. This existing, and retained, arrangement would result in no significant loss of privacy to businesses within No.7 Bleeding Heart Yard, or other neighbouring commercial properties. We would be willing to consider measures or conditions to minimise any perceived overlooking from two roof level windows directly adjacent to the roof terrace of No.7 if officers sought these.
- 3.5 In terms of the impact on daylight to No.7 Bleeding Heart Yard, this has been assessed within the submitted Daylight and Sunlight Report by GL Hearn. The report concludes that all but one of the windows in this building would meet the BRE guidance for daylight amenity. Only one window which does not meet BRE guidance serves the residential part of the building and falls marginally below this BRE recommended value. Given that this room is served by multiple windows and considering the

urban nature of the site, the impact on No.7 Bleeding Heart Yard is considered to be acceptable.

- 3.6 In terms of the impact on daylight to No.3-5 Bleeding Heart Yard, this has also been assessed within the submitted Daylight and Sunlight Report by GL Hearn. The report concludes that the vast majority of windows serving rooms with a potentially specific requirement for natural daylight would meet the BRE guidelines. Where transgressions occur, the reductions are either marginally below the recommended BRE values or those rooms are served by multiple windows. Given the above, together with the fact that this is an urban location, the impact on No.3-5 Bleeding Heart Yard is acceptable.
- 3.7 There is no right to a domestic view in planning terms. However, effects on the outlook from a property can be assessed by the local planning authority. Due to the location of the extensions relevant to the existing building, there would be no significant impact on outlook to neighbouring properties which would remain unfettered across Bleeding Heart Yard.

4 Consultation

- 4.1 Representations have been received which relate to the consultation processes that have taken place and relating to the lack of display of a site notice within Bleeding Heart Yard.
- 4.2 These representations have been received from W.G. Burnett, Mark Hardwicke, Samjess Properties, Stuart Rucker, Martin Robinson, James Perez, A.D. Hirschfield and H. Kaye.
- 4.3 We can confirm that the due process for consultation has taken place in the lead up to and submission of the planning application, including formal pre-application discussions with the Council and a public consultation event held on Monday 18th December 2017.
- 4.4 Matters relating to consultation during the course of the planning application are a matter for Camden to comment on.

5 Other matters

- 5.1 Father Tom Deidun's comment in relation to the pausing of works for 40 minutes each day are acknowledged. However, it is not considered that the construction works resulting from the proposed development would prevent these services from taking place or unacceptably affect them. Mitigation measures, including standard construction work time limits, could be included by the local planning authority if deemed necessary and reasonable.
- 5.2 Robyn Wilson states that the proposals amount to: 'a hijacking of public space'. However, the area being extended into is within the ownership of the applicant and is already in use for below ground servicing and plant, together with above ground car parking. The proposals would improve the character of Bleeding Heart Yard in this respect by removing the 'back of house' servicing area that currently exists in this part of the site and transforming this elevation to an active and integrated part of Bleeding Heart Yard.

5.3 Comments received from Crossrail Limited and the Design Out Crime officer are acknowledged. The points set out within these responses are being considered by the applicant.

Yours sincerely
For Tibbalds Planning and Urban Design

A handwritten signature in black ink, appearing to read 'Jennifer Ross', with a large, sweeping flourish underneath.

Jennifer Ross

Director

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