

# PLANNING AND DESIGN & ACCESS STATEMENT 67 - 74 SAFFRON HILL, LONDON, EC1N 8QX

In relation to a proposed development comprising:

*The erection of a three-storey extension to the existing building, comprising 244.8 square metres of additional B1 office and employment space on the Onslow Street elevation.*



**JUNE 2019**

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## **1.0 INTRODUCTION**

- 1.1 Cunnane Town Planning LLP has been instructed by Nyraff Limited to submit a planning application for full planning permission for:

*'The erection of a three-storey extension to the existing building, comprising 244.8 square metres of additional B1 office and employment space on the Onslow Street elevation.'*

- 1.2 The purpose of this statement is to assess the proposed development against the provisions of the development plan and other material considerations, including national planning policies contained in the National Planning Policy Framework (NPPF) and favourable comments received in respect of a similar proposal.
- 1.3 The Statement forms an integral part of the application submission and should be read in conjunction with the application drawings.

## **2.0 SITE DESCRIPTION**

- 2.1 The application site comprises a six storey 1960's office building in central London. The existing building has a basement that occupies the majority of the site. The front elevation to Saffron Hill comprises of a two-storey element which extends the full width of the site. Above and set back from this is a three storey 'tower' element that stretches back to the rear of the site facing Onslow Street.
- 2.2 The building appears taller on the Onslow Street side because of the difference in levels between the front and back of the site. Essentially the basement level becomes the ground floor at the rear of the building and rises up the full six storeys. There is a small two storey side projection to the building on the Onslow Street elevation.
- 2.3 The building forms part of a continuous terrace of buildings. To the south and neighbouring the site on the Saffron Hill elevation is the Ziggurat Building (a former paintworks, now in residential use), which is nine storeys high at its highest point.
- 2.4 To the north is another office building facing Clerkenwell Road which is predominantly five storeys high with a smaller sixth storey element set back from the perimeter of the building. At the rear, No. 20 Onslow Street (and 65 Clerkenwell Road) is a 4/5 storey commercial building facing the application site.

## **3.0 PLANNING HISTORY**

- 3.1 A full planning history is contained within the Appendix. However, the most relevant planning history is considered to include the following:-

Application No. 2016/3018/P:	Erection of two storey extension to front elevation at second floor. Alterations and refurbishment throughout building including fenestration details (Class B1(a)) – Granted subject to s106 agreement 27/11/2017.
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This application proposed a two storey extension to the front elevation on Saffron Hill at third and fourth floor totalling 256 square metres. The extension was to be 27.0 metres wide along the front elevation, 2.8 metres deep off the existing upper floors and 7.0 metres deep on the north western corner and 6.5 metres high over two storeys.

Application No. 2016/4143/P:	Erection of first floor extension to side/rear of building (Onslow Street side) (Class B1(c)) - Granted subject to s106 agreement 27/11/2017.
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The application proposed a single storey extension at roof level on the rear elevation on Onslow Street side. The 'L' shaped extension was 9.3 metres wide, 11.2 metres deep and 7.5 metres high. The extension was proposed to be constructed from brick to match the main property.

Application No. 2019/1196/P: Non-material amendment (alterations to fenestrations details) of planning permission ref: 2016/3018/P dated 27/11/2017 for the erection of two storey extension at front elevation at second floor. Alterations and refurbishment throughout building including revised fenestration details (Class B1(a)) Granted 15/03/2019.

Non-material amendment to alter the window arrangement.

Application No. 2018/4970/P: Variation of condition 3 (approved drawings) of planning permission 2016/4143/P dated 27/11/2017 for the erection of first floor extension to side/rear of building (Onslow Street side) (Class B1(c)), namely window replacements. Granted 16/05/2019

Minor material amendment to alter the window arrangement.

Application No. 2018/5028/P: Erection of additional storey at fifth floor level and erection of additional storey at second floor level (rear/Onslow Street side) to office building (Use B1a) -Refused 02/5/2019 due to unacceptability of fifth floor addition.

This most recent application proposal had sought permission for the erection of an additional storey to the fifth floor level and erection of an additional storey at second floor level was refused under the terms of application no. 2018/5028/P, with a decision notice issued on 02 May this year.

#### **4.0 THE PROPOSAL**

- 4.1 The roof extension previously proposed has now been deleted from the proposal, with this application seeking a three storey in place of the non-contentious element of the previous application scheme which had also proposed a single storey extension on the Onslow Street frontage. The three storey extension now proposed will sit above a first floor extension previously approved under the terms of application no. 2016/4143/P granted, subject to a s106 agreement, on 27<sup>th</sup> November 2017.
- 4.2 Instead of proposing an additional 151 square metres of office space as per the single storey extension most recently proposed, this application now proposes to create 244.8 square metres of additional space, representing an 'infill' development between the existing 5-storey element of the building and the adjoining development comprising (address) situated on the corner of Saffron Hill and Onslow Street.
- 4.3 The additional floorspace will be in use class B1, which is consistent with the rest of the building. This represents a 'minor' development in respect of the Camden Local Validation List.

#### **5.0 DOCUMENTS**

- 5.1 The following documents form an integral part of this application submission:-

- Drawing No. 1908 000 Location Plan
- Drawing No. 1908 100 Existing Basement & GF Plan
- Drawing No. 1908 101 Existing 1<sup>st</sup> & 2<sup>nd</sup> Floor Plans
- Drawing No. 1908 102 Existing 3<sup>rd</sup> & 4<sup>th</sup> Floor Plans
- Drawing No. 1908 103 Existing Roof Plan
- Drawing No. 1908 110 Existing Front Elevation
- Drawing No. 1908 111 Existing Rear Elevation
- Drawing No. 1908 112 Existing Side Elevation 1
- Drawing No. 1908 113 Existing Side Elevation 2
- Drawing No. 1908 114 Existing Courtyard Elevation
- Drawing No. 1908 200 Proposed 2<sup>nd</sup> & 3<sup>rd</sup> Floor Plans
- Drawing No. 1908 201 Proposed 4<sup>th</sup> & Roof Floor Plans

- Drawing No. 1908 210 Proposed Front Elevation
- Drawing No. 1908 211 Proposed Rear Elevation
- Drawing No. 1908 212 Proposed Side Elevation 1
- Drawing No. 1908 213 Proposed Side Elevation 2
- Drawing No. 1908 214 Proposed Courtyard Elevation

5.2 In addition, the application is also accompanied by a draft s106 agreement to secure:-

- 50% of the additional floorspace created as a jewellery workshop use, in accordance with policies G1 of the London Borough of Camden Local Plan 2017;
- Necessary highway works in accordance with policies A1 and T1 of the London Borough of Camden Local Plan 2017; and
- A Construction Management Plan (CMP) and associated CMP Implementation Support Contribution as required by policies A1 and T4 of the London Borough of Camden Local Plan 2017.

## 6.0 PLANNING ASSESSMENT

### Principle of Development

- 6.1 The principle of the proposed development has already been largely established, firstly by the previous approval for a single storey extension on the Onslow Street frontage in November 2017; and secondly, by the favourable comments made by the local planning authority in respect of the most recent application which included a proposal for a further floor in this location.
- 6.2 Whilst the most recent application was refused, this was largely on the basis of the Council's concerns in relation to the fifth floor roof extension. However, in respect of the extension on the Onslow Street side, the Council was largely supportive.
- 6.3 In this respect and in terms of the principle of the use, the delegated report stated in paragraph 3.1 that "As the proposal does not seek to introduce any new uses to the site, the proposal is considered acceptable in principle in regards to land use".
- 6.4 Although the current application proposes a three storey rather than single storey extension, the scale is not considered inappropriate given the existing six storey element of this part of the application site on the Onslow Street frontage and the neighbouring building. Similarly the form is as per the existing; the latter being previously judged as acceptable.
- 6.5 In this regard, paragraph 4.5 of the previous delegated report states that the extension is considered acceptable in scale and form, considering that it would not compete with the building core nor the neighbouring buildings. Although the 'gap' between the two would be significantly reduced, this is not considered to be unacceptable in design terms, especially given that the 'infill' extension would still be a whole floor lower than much of the existing building.
- 6.6 The principle of employment use is established by virtue of the existing commercial use. It is considered that the increased floorspace meets London Plan policy 4.2 (Offices) and would contribute to the demand figures specified in Table 4.1 ('Demand for office-based employment and floorspace, 2011–2031'). The proposals are in line with Local Plan policy E1 (Economic development) which seeks to support small to medium enterprises and encourages economic development across the borough. Specifically, part g supports the intensification of existing office space, where there is opportunity for additional employment.
- 6.7 The application site is located with the 'Central Activities Zone' (CAZ). Local Plan policy E2 ('Employment premises and sites') seeks to protect and support the function of the CAZ in line with the strategic policies of the London Plan. The policy seeks to encourage the provision of employment premises and sites in the borough. Several of the criteria set out within the policy are relevant to the proposed development. These being part (c), which seeks to retain or increase floorspace, and part (f), which encourages space suitable for start-ups, small and medium-sized enterprises. The proposal increases the amount of floorspace available for business use, in support of employment and the local economy, and is therefore strictly in accordance with policy E2.

### Hatton Garden Jewellery Sector

- 6.8 Local Plan policy E2 states that when proposals are for an additional 200sqm floorspace, as is the case in this instance, the council will seek 50% as an 'affordable workspace' for the jewellery sector. The applicant therefore would welcome early engagement between the local authority and their representatives to negotiate a reasonable contribution in this regard, for which an appropriate legal agreement will be prepared.

### Design

- 6.9 The London Plan seeks design that is cohesive with the existing character through policy 7.4 ('Local Character') and high-quality architectural treatment through policy 7.6 ('Architecture'). Local Plan policy D1 ('Design') states that high quality design will be secured through a number of criteria, with which the proposed extension accords.

### Onslow Street

- 6.10 The proposed development adds three additional floors on to a part of the application site which has already been extended in the past and continues the rhythm of the façade blending appropriate, matching materials in order to provide an unobtrusive design. This will be of a high quality, allowing the enlarged building to integrate well into its surroundings. The proposed development therefore meets the requirements set out in the London Plan and within policy D1.
- 6.11 Extending in this area has already been considered to be a non-contentious element and it is not considered that adding a further three floors to this part of the building will have any greater an impact than the previous proposal for one additional floor.
- 6.12 It is noted that the proposed infill would preserve the step down from the neighbouring Ziggurat building, to the subject site and the neighbouring building on the corner of Onslow Street and Clerkenwell Road, which then step. It is considered that in townscape terms the proposed infill, culminated with the improvements to the building associated with council ref: 2016/3018/P (now implemented) would constitute a significant investment into the building's exterior and in turn make a marked improvement to this area of Onslow Street and the wider Conservation Area.

### Amenity and Impact on Neighbouring Properties

- 6.13 London Plan policy 7.6 ('Architecture') and Local Plan policy A1 ('Managing the impact of development') seek to protect the amenity of the surrounding buildings, especially those in a residential use. The application site is located within a dense urban context where opportunities for new economic development, which does not cause undue impact on neighbouring uses, namely residential use, is limited. The proposed development would not cause effect on the neighbouring properties due to the limited nature of the side extension and the surrounding land use context.



Fig 1: Photograph showing location of proposed 'infill' extension (on the rear/Onslow Street frontage).

### Enclosure

- 6.14 The level of enclosure on the Onslow Street elevation is indeed part of the character of the area. The officer highlighted the following in relation to the previous scheme - *'Onslow Street is a narrow, canyonlike alley, whose sense of enclosure will barely be affected by the proposal, which will infill a narrow gap between much taller blocks on either side'*. The proposal before the council is an additional three storeys and it is considered that the same assessment applies in this instance, especially given the height and scale of neighbouring buildings.

### Privacy

- 6.15 In relation to privacy, in the officer's assessment of the previous planning permissions, the additional windows are not considered to cause adverse effect or overlooking given there are already windows on the same elevations. This is a characteristic of the area and it is noted that the close-knit streets, with buildings facing one another at close quarters are an intrinsic characteristic of the area, as identified within the Conservation Area Appraisal and Management Plan. The Onslow street elevation faces onto offices and poses no issue in terms of overlooking. The proposals are therefore policy compliant in this regard.

### Light Pollution

- 6.16 In the previous application for the extension to Onslow Street it was accepted that the proposals would not result in additional light pollution. It is also noted that this element of the building faces onto other offices.

- Light Pollution - *'The extensions are also not considered to worsen light pollution given windows shall be within elevations that already include glazing and that there shall be no windows on the east facing elevation which the residential are located adjacent to.'*

- 6.17 The above assessment from the Delegated Report of the approved scheme equally applies in respect of the current application. There is nothing to suggest that the newly created floorspace would be operated for anything other than similar hours to the existing businesses, which regular hours of opening. On this basis the proposed extension on Onslow Street would not result in additional light pollution outside of normal office hours.

### Daylight and Sunlight

- 6.18 The location of the proposed development on Onslow Street is in a built-up area typical of the locality. Adjacent to the proposed upward extension, the existing buildings will still be taller and therefore the proposal will not result

in loss of daylight and sunlight to the buildings opposite. As previously stated the proposed extension would face onto offices.

#### Access

- 6.19 The access arrangement remains the same as the consented application 2016/4143/P in terms of the ground floor, meaning no new issues arise in this regard. The additional floors will be accessed by the same lift which already provides access to equivalent floors within the existing building, meaning all access requirements are met.
- 6.20 The proposal has been designed to accord with part M (Volume 2) of the Building Regulations 2010.

#### Sustainable Development Considerations

- 6.21 Policy 5.3 ('Sustainable Design and Construction') of the London Plan and local plan policy CC1 ('Climate change mitigation') both seek to ensure new buildings are of a sustainable design. Given the proposal is minor in nature and represents an extension to the existing building, this is not considered to be so relevant, albeit that modern sustainable construction materials and techniques will be adopted as appropriate.

#### Cycle Parking

- 6.22 In accordance with table 6.3 of the London Plan, there is sufficient space located within the existing courtyard to accommodate a policy compliant provision of cycle parking. This aspect of the scheme can be secured via an appropriately worded condition.

### **7.0 HERITAGE CONSIDERATIONS**

- 7.1 The application site is within the Hatton Garden Conservation Area, which is a designated heritage asset. The site is not, however, in proximity to any buildings that are subject to local or statutory listing. The NPPF section 16 ('Conserving and enhancing the historic environment') seeks to protect designated heritage assets and Local Plan policy D2 (heritage) seeks to preserve and where appropriate enhance the settings of conservation areas.
- 7.2 The Hatton Garden Conservation Area Appraisal and Management Plan (2017) is of relevance to the proposals. The application site falls within sub-area 5: Farringdon Road. The site forms part of the 'more recent buildings' and the proposed development would maintain this architectural characteristic. As discussed at paragraph 6.12 of this statement, the proposal along with the various other improvements to the building would result in improvement to the street scene and therefore would be of benefit to the Conservation Area.

### **8.0 CONCLUSION**

- 8.1 This statement demonstrates that the proposed additional floorspace resulting from the proposed extensions would improve and enhance the office and employment offer on the site meeting strategic and local need. The proposed design is sensitive and does not raise issue in terms of local amenity. The proposed design is in keeping with the existing building and the characteristics of the Conservation Area.
- 8.2 The proposals therefore comply with the development plan and no material considerations indicate otherwise, in accordance with Section 38(6) of the 2004 of the Act, planning permission should be granted.



## **Appendix: Comprehensive Planning History**

8580026 - Projecting box sign (1300 x 300mm at height of 2.4m to the underside). (As shown on one unnumbered drawing) – Granted 13/03/1985.

9000107 - Continued use as the Headquarters of the National Society for the Prevention of Cruelty to Children including offices meeting and teaching facilities and ancillary storage and housekeepers flat as shown on location plan (Ref:K205/P307/001/1) – Approved 26/06/1990.

PSX0005186 - Construction of new 5th floor – Withdrawn 06/12/2000.

PSX0104764 - Construction of new 5th floor to be used as offices – Refused 24/10/2001.

PSX0204458 - Erection of fifth floor roof extension to be used as offices – Refused 06/03/2003 and appeal dismissed 30/09/2003.

2010/0938/A - Retention of two internally illuminated projecting signs at ground floor front elevation of office building – Approved with conditions 11/05/2010

2010/0941/P - Retention of roller shutter doors with pedestrian gates on the front and side elevation and windows at the side elevation, and infill extension at side elevation over part of the service yard at ground floor level. Refused and warning of enforcement action to be taken 08/07/2010 after consideration of the application at the Development Control Committee meeting on 24/06/2010.

2011/2442/P - Retention of infill extension for additional office (Class B1) accommodation and associated windows and installation of bi-fold door, all at ground floor level on side (south) elevation - Full Planning Permission Granted subject to a Section 106 Legal Agreement and Warning of Enforcement Action (roller shutter to be removed) on 09/01/2012.

2016/3018/P - Erection of two storey extension to front elevation at second floor. Alterations and refurbishment throughout building including fenestration details (Class B1(a)) – Granted subject to s106 agreement 27/11/2017.

2016/4143/P - Erection of first floor extension to side/rear of building (Onslow Street side) (Class B1(c)) - Granted subject to s106 agreement 27/11/2017.

2018/5028/P - Erection of additional storey at fifth floor level and erection of additional storey at second floor level (rear/Onslow Street side) to office building (Use B1a) - Refused 02/5/2019 due to unacceptability of fifth floor addition.