

Our Ref: DJM/KFW/DP5643

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Dear Nathaniel,

**20 – 24 KIRBY STREET, LONDON EC1N 8FA
PLANNING APPLICATION REF: 2021/4482/P
UPDATED PLANNING APPLICATION SUBMISSION**

On behalf of our client, Colgold Limited, please find enclosed an updated set of planning application documents in relation to planning application Ref: 2021/4482/P in relation to the Site known as 20 – 24 Kirby Street (the “Site”), London EC1N 8FA in the London Borough of Camden (“LB Camden”).

The purpose of this application is to principally upgrade and extend the existing building to deliver modern office accommodation for future users, together with the creation of new affordable jewellery space. Together with internal alterations, the external appearance of the building is proposed to be upgraded and considered to make a positive contribution towards the local townscape setting and the visual cohesion of the area. Overall, the uplift in floorspace will contribute towards meeting LB Camden’s office floorspace requirements.

Background

An application for full planning permission (Ref: 2021/4482/P) was submitted in September 2021 for the following:

“Demolition of existing fifth floor; erection of two additional storeys to create additional office floorspace; creation of affordable jewellery space at lower ground floor level; internal and external alterations, plant and other associated works.”



Following on-going engagement with LB Camden officers, amendments have been made to the proposed development in order to positively respond to the comments received. This follows on from constructive discussions with officers in relation to the overall height, massing and architectural treatment of the proposed development. As a consequence of these discussions, the following key changes have been incorporated into the proposal (including but not exclusive to):

- Reduction of the proposed extension by one storey;
- Consolidation of external rooftop plant;
- Reconfiguration of the fifth floor extension;
- Revised material palette and fenestration treatment; and
- Relocation and reduction of plant across the scheme to minimise visibility.

As part of this exercise, the applicant has undertaken a review of all submission documents, which have been updated to reflect the latest updates to the proposed development. For clarity these are listed out below:

- Updated Application Forms and Certificates, prepared by DP9 Ltd;
- Updated CIL Additional Questions Form, prepared by DP9 Ltd;
- Site Location Plan, prepared by DLA;
- Existing Plans, Sections and Elevations, prepared by DLA;
- Proposed Plans, Sections and Elevations, prepared by DLA;
- Design and Access Statement, prepared by DLA;
- Updated Heritage, Townscape and Visual Impact Assessment, prepared by KM Heritage;
- Updated Transport Assessment, prepared by Curtins;
- Updated Delivery and Servicing Plan, prepared by Curtins;
- Updated Travel Plan, prepared by Curtins;
- Updated Daylight and Sunlight Assessment, prepared by Point2 Surveyors;
- Updated Energy Statement, prepared by BTP Sustainability;
- Updated Sustainability Statement, prepared by BTP Sustainability;
- Updated Acoustic Assessment, prepared by RBA Acoustics; and
- Updated Statement of Community Involvement, prepared by Kanda.

In addition, the description of the development has been amended as follows (see overleaf):



“Demolition of existing fifth floor and erection of a single storey extension together with the creation of new office floorspace (Use Class E(g)), internal and external alterations, plant and other associated works.”

An update to our previous planning overview and associated assessment is set out below.

The Site

20 – 24 Kirby Street comprises of a part four, part five storey building which sits on the apex between St Cross Street to the north, Saffron Hill to the east and Kirby Street to the west. The building was originally constructed in 1974 and has no relevant planning history. It is currently vacant. Overall, the building is considered no longer fit for purpose with largely outdated with inefficient floorplates and is unsuitable for modern office occupiers.

The building is covered by a series of policy designation which are set out below:

- Central Activities Zone
- LVMF Viewing Corridor (View 3A.1)
- Central London Area
- Hatton Garden Area
- Archaeological Priority Area

In addition to the above policy designations, the Site is also included within the Hatton Garden Conservation Area. There are no immediate statutorily listed buildings within proximity of the Site although sits in the setting behind Wren House (Grade II Listed). In addition, the building has a PTAL Rating 6b (the ‘best’) and is located in Flood Zone 1.

The Proposals

The proposals principally seek to upgrade the existing building, which includes the removal of the existing fifth floor and infilling of the central void together with the erection of a single storey extension and plant, which will be setback from the host building. As part of the proposals the core will be relocated as part of creating rational and efficient floorplates.

Overall, the proposals will deliver an uplift of approximately 440sqm (GIA) of modern office accommodation. The resultant workspace will benefit from improved natural light and new external terraces. Externally, the building is proposed to be upgraded, introducing a sympathetic palette of new brickwork and cast stone on the proposed extension.



The proposals also include the provision of 166sqm (NIA) of affordable jewellery workspace, which will be accessible from the ground and located within the lower ground floor of the building. The approach to the affordable jewellery workspace has been discussed and agreed in-principle with officers and will be secured via a Section 106 Legal Agreement. The proposals incorporate a Whole Life Carbon approach to development and will also result in a 49% Carbon reduction over Part L, representing a significant improvement in the energy efficiency of the building.

Collectively, the proposals are considered to represent a significant improvement in the overall visual appearance of the building and positively contribute towards the townscape setting.

Planning Policy Assessment

Principle of Development

Policy G1 outlines the Council's priorities over the lifetime of the Local Plan which includes securing the delivery of 695,000sqm of new employment floorspace. It will support development that makes the best use of a site with growth expected to take place in Central London amongst other designated locations. Policy E1 of the Local Plan states that the Council will direct new office development to the Central London Area and support proposals for the intensification of employment sites where they provide additional employment and other benefits in accordance with Policy E2. Part G (iv) of Policy E1 also states that the Council will also promote the jewellery industry in Hatton Garden. Policy E2 states that the intensification of existing sites for the continued business use will be supported where the existing level of employment floorspace is at least maintained or increased.

The proposals have been designed to make the efficient use of the Site through the principles of Whole Life Carbon. The scheme will retain the existing structure of the building and will in-fill and relocate the existing core whilst sensitively extending the building upwards, through setbacks at each level. It will result in an increase in 440 sqm (GIA) of office floorspace, which together with the upgrade of the existing office floorspace, make a positive contribution towards meeting LB Camden's office and employment needs. It will be designed to suit a range of SME occupiers and will include the provision of affordable jewellery workspace which is set out in further detail below. Overall, the principle of delivering new office floorspace in this location is strongly supported in planning policy and accords with the Development Plan.



Affordable Jewellery Workspace

Policy E2 of the Local Plan states that proposals in Hatton Gardens which result in an uplift in floorspace of 200sqm (GIA) or more will be required to deliver 50% of the additional floorspace as affordable premises suitable for the jewellery sector. As discussed with officers, the proposals will deliver 166 sqm (NIA) of affordable jewellery space which has been agreed in-principle. This is more than the 50% of the NIA uplift of the development (246.4sqm) which would otherwise equate to 123.2sqm.

The affordable jewellery space will be accessed via a separate entrance at ground and located at the lower ground floor level. Users will have access to shared amenities with the building, including bike storage, showers and W.C. facilities. The rent level secured for the affordable jewellery space will be an average of market rents in accordance with supporting paragraph 5.52 of the Local Plan. Overall, it is considered that the proposals will make a tangible contribution towards meeting the Council's priorities for affordable workspace in Hatton Garden and accords with the Development Plan.

Design and Heritage

Policy D1 of Local Plan states that the Council will seek to secure high quality design and as part of this approach, sets out a variety of criteria to be considered for new development proposals, including: respecting the local context and character, preserves and enhances the historic environment (in accordance with Policy D2); is sustainable in design and construction; incorporates high quality materials and details; is inclusive and accessible for all; incorporates outdoor amenity space; and preserves local and strategic views. Policy D2 states that development in Conservation Areas should preserve and where possible, enhance the character or appearance of the area.

As part of the Whole Life Carbon approach adopted for the building, the proposals will retain the existing structure, which is considered sound. It will introduce high-quality materials into the building palette, which will improve and enhance the building's overall appearance. The proposals have been designed to allow the building to be fully DDA compliant and also incorporates a modest terrace on the proposed upper floor as part of delivering amenity space for future occupiers. It will preserve and enhance local views. It will not be visible within the LVMF View 3A.1 Viewing Corridor.

The existing building aesthetic is considered to be largely typical of a post-war office building and is neutral both in its appearance and contribution to the wider townscape of the Hatton Garden Conservation Area. As set out in the accompanying Heritage and Townscape Visual



Impact Assessment (HTVIA), the modest changes now proposed as part of the proposed development will enhance the character and appearance of the Conservation Area. Likewise, the proposals will also improve the overall appearance and utility of the building and will enhance the setting of neighbouring positive contributors in the Conservation Area.

The massing of the extension is considered to be wholly consistent with other buildings within the vicinity of the site and the wider Conservation Area. As part of the revised scheme, the MEP strategy has been developed to significantly reduce the roof-level plant which has been consolidated to reduce its visual appearance. Overall, the building has been sensitively designed through the choice of materials and neatly sits within the townscape setting and as outlined in the HTVIA, will preserve and enhance the setting of adjacent listed and locally listed buildings.

In conclusion, it is considered the proposals positively accord with the development plan and represent a significant improvement in relation to the visual aesthetic and design of the host building, whilst enhancing the setting of the Conservation Area and the buildings within it.

Energy and Sustainability

Policy CC1 of the Local Plan states that the Council will promote net zero carbon and require all developments to reduce carbon dioxide emissions in accordance with the energy hierarchy set out in the London Plan. In addition, the Policy also states that development should also minimise the need to travel by car, support and encourage sensitive energy efficiency improvements to existing buildings and expect all developments to optimise resource efficiency. Policy SI2 of the London Plan (2021) sets out the requirements for major developments to be designed in accordance with the energy hierarchy (Be Lean; Be Clean; Be Green). This requires major developments to achieve a minimum reduction of 35% over Building Regulations 2013 Part L and should aim to be Net Zero.

The proposals for 20 – 24 Kirby Street are categorised as a ‘minor’ development and therefore the requirements set out under Policy SI2 do not strictly apply. Notwithstanding, as part of overall approach adopted for this development, the proposals have been designed to be highly energy efficient and a significant improvement over the existing baseline. To this end, sustainable technologies have been incorporated, including Air Source Heat Pumps (ASHPs) and will result in an overall Carbon reduction of circa 49% over Building Regulations 2013 Part L. In addition, a BREEAM Pre-assessment has been prepared as part of this submission which demonstrates that the scheme can achieve a BREEAM target for ‘Excellent’ through a series of measures, noting that the site sits within a highly sustainable location for travel. Overall, the proposals are considered to positively accord with the development plan.



Noise

Policy A4 of the Local Plan states that the Council will seek to ensure that noise and vibration is controlled and managed. Development proposals should also have regard to the Council's Noise and Vibration Thresholds. As set out in the accompanying Noise Impact Assessment, the proposed plant has been assessed and several mitigation measures recommended as part of reducing the atmospheric noise levels. On the basis that this is followed, the proposals would be in accordance with the requirements under Policy A4 and considered acceptable.

Daylight and Sunlight

Policy A1 of the local plan states that the Council will seek to protect the quality of life for occupiers and neighbours. Permission will be granted for development unless proposals result in an unacceptable harm to amenity. Factors that the Council will take into consideration including sunlight, daylight and overshadowing.

As part of this submission a Daylight, Sunlight and Overshadowing Report has been prepared by Point2 Surveyors which assesses the impact of the proposals on neighbouring residential properties in accordance with the BRE Guidance. As concluded in the report, 88% of residential windows will remain fully BRE compliant when assessed against VSC with 99% of rooms experiencing an unnoticeable change when measured against NSL methodology. The one room that does not strictly accord with the BRE guidance is considered to be borderline case and when considered with other factors are considered to be acceptable. Overall, whilst there are some minor breaches, these are considered commensurate with the local urban setting.

Parking

Policy T1 of the Local Plan states that cycling will be promoted throughout the borough. Developments should provide for accessible, secure cycle parking facilities exceeding the minimum London Plan Standards and also make provision for high quality facilities that encourage cycling (showers and changing facilities). Policy T2 requires all new development to be car-free.

The proposals will include the provision of 50 long-stay cycle parking spaces and 12 foldable bike stores will be provided in the lower ground floor of the building in excess of the 48 spaces required under policy. Four Sheffield Stands, providing short stay parking for up to 8 bikes is provided on-street and it is proposed that this will be utilised for the short-stay provision accordingly. All cyclists will be able to access the cycle store via a separate entrance, with



changing and shower facilities also provided. The building has no on-site or on-street parking and it is not intended that any additional car parking will be delivered as part of the proposals.

Delivery and Servicing

Policy T3 of the Local Plan states that the Council will promote the sustainable movement of goods and materials with a view to minimise the use of roads for such activities. As alternatives, the Council will promote the movement of goods and materials via the canal infrastructure, cycling and rail.

The proposals will include servicing of the building in accordance with the existing arrangements from the kerbside along Kirby Street. As set out in the accompanying Delivery and Servicing Plan (DSP), the proposals will result in 1 additional daily trip over the existing arrangement and is not considered to have a material impact. As set out in the DSP a series of management measures and opportunities have been identified. This includes encouraging the use of cargo bikes and reducing freight trips. Overall, it is considered that the proposals accord with the development plan.

Summary

Overall, the proposals are considered to represent a significant improvement to the host building, providing modern office accommodation, suitable to meet the needs of future occupiers. It will improve the visual appearance of the building and positively contribute towards the setting of the Conservation Area and nearby positive contributors. It has been sensitively designed with a choice of materials and setbacks on the upper storeys which have been deliberately designed to create a clean, linear extension which neatly sits within the townscape setting.

We trust that this update to the original submission is sufficient to allow officers to positively determined this application accordingly. Should you have any questions or would like to discuss further, please contact either David Morris or Katharine Woods at this office.

Yours sincerely,

DP9 Ltd
(Encl.)