

Address:	NCP Car Park 45 to 54 Saffron Hill and 3 Saffron Street London EC1N 8UN		2
Application Number(s):	2024/1364/P	Officer: Ewan Campbell	
Ward:	Holborn and Covent Garden		
Date Received:	08/04/2024		
Proposal:	Demolition of existing car park and offices, and erection of a new 8 storey building for use as office (Class E); with ground floor cafe unit and affordable workspace in basement. Proposed servicing facilities, cycle and refuse storage and associated landscaping along St Cross Street.		

Background Papers, Supporting Documents and Drawing Numbers:

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

22068-AHMM-ZZ-ZZ-DR-A-PL001, 22068-AHMM-ZZ-ZZ-DR-A-PL011, 22068-AHMM-ZZ-GF-DR-A-PL100 Rev 01, 22068-AHMM-ZZ-01-DR-A-PL101, 22068-AHMM-ZZ-05-DR-A-PL105 Rev 02, 22068-AHMM-ZZ-06-DR-A-PL106 Rev 02, 22068-AHMM-ZZ-07-DR-A-PL107, 22068-AHMM-ZZ-08-DR-A-PL108, 22068-AHMM-ZZ-09-DR-A-PL109, 22068-AHMM-ZZ-LGF-DR-A-PL10L, 22068-AHMM-ZZ-B1-DR-A-PL10B, 22068-AHMM-ZZ-XX-DR-A-PL201, 22068-AHMM-ZZ-XX-DR-A-PL202, 22068-AHMM-ZZ-XX-DR-A-PL203, 22068-AHMM-ZZ-XX-DR-A-PL301, 22068-AHMM-ZZ-XX-DR-A-PL302 Rev 02.

22068-AHMM-ZZ-GF-DR-A-PL210, 22068-AHMM-ZZ-01-DR-A-PL211, 22068-AHMM-ZZ-01-DR-A-PL212, 22068-AHMM-ZZ-01-DR-A-PL213, 22068-AHMM-ZZ-01-DR-A-PL214, 22068-AHMM-ZZ-05-DR-A-PL215, 22068-AHMM-ZZ-06-DR-A-PL216, 22068-AHMM-ZZ-07-DR-A-PL217, 22068-AHMM-ZZ-08-DR-A-PL218, 22068-AHMM-ZZ-09-DR-A-PL219, 22068-AHMM-ZZ-B1-DR-A-PL21B, 22068-AHMM-ZZ-XX-DR-A-PL221, 22068-AHMM-ZZ-XX-DR-A-PL222, 22068-AHMM-ZZ-XX-DR-A-PL223, 22068-AHMM-ZZ-XX-DR-A-PL231, 22068-AHMM-ZZ-XX-DR-A-PL232.

Acoustic Impact Report 023620-R03-B; Air Quality Impact Assessment 14810-01 v2.00; Archaeological Desk Based Assessment November 2023; Basement Impact Assessment 38823-A2SI-XX-XX-RP-Y-0004-03 June 2024; Biodiversity Gain Plan and Urban Greening Factor Review 147523; Circular Economy Statement Rev E July 2024; Construction Management Plan dated 15th February 2024; Daylight, Sunlight and Overshadowing Report P3173; Draft Delivery, Servicing & Waste Management Plan March 2024; Design and Access Statement March 2024; Energy Strategy Rev E July 2024; Fire Statement 231219DN00F1; Flood Risk Assessment and Drainage Strategy Report 2929; Framework Travel Plan March 2023; Regeneration Statement March 2024; Security Needs Assessment SGW-JN-001600; Sustainability Statement December 2023; Transport Statement March 2024; Whole Life Carbon Assessment Rev H2 October 2024, GLA Reporting Spreadsheet (Rev B), WLCA Assessment spreadsheet (Rev H2)

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	Agent:
C/o Agent	Mike Moon DP9 100 Pall Mall London SW1Y5NQ

ANALYSIS INFORMATION

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Sui Generis	Car Park with ancillary office space	11,735	0	-11,735
Class E (g)	Commercial office space	0	11,679	+11,679
Class E (a)	Retail unit on ground floor	0	173	+173
Total			11,852	117

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	353	0	-353
Car - Disabled accessible	0	1	+1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – commercial long stay	0	205	+205
Cycle – short stay (all uses)	0	18	+18

EXECUTIVE SUMMARY

- i) The proposals seek demolition of the existing 8 storey car park (Sui Generis) and redevelopment of the site to provide a new 8-storey building comprised of office floorspace (Class E) on the ground and upper floors, café and restaurant space on part of the ground floor (Class E), and affordable workspace at ground and

basement level (Class E) with rooftop plant. Removal of the car park aligns with the objectives of the Council's transport policies. The proposed office space will support the provision of commercial use within the Hatton Garden area and the affordable workspace will support the jewellery sector in line with development plan employment policies.

- ii) In terms of the principle of demolition, the building lends itself very poorly for any use other than car parking without very significant intervention and rebuilding required to it. The car park is also listed as making a negative contribution to the conservation area. Therefore the principle of demolition is accepted.
- iii) Low carbon design principles have informed the architectural approach from the outset, and the building is made up of a lightweight hybrid structure, an efficient skin with user control, and a streamlined expressed frame for the facade with careful setbacks and passive shading measures. The building current has little activation however this will be completely changed with entrances proposed on Saffron Hill, St Cross Street, and Saffron Street as well as an independent retail unit on the corner of St Cross Street and Saffron Hill
- iv) The approach to the proposed building's massing responds to its tight urban context, the upper three storeys stepping back incrementally from a 5-storey shoulder height. The internal steel structure is expressed on the external façade to maximize efficiency and provide a simple series of architectural bays. Its slim-profile steel extrusions are designed for lightweight efficiency, reflecting low-carbon principles and forming a distinct contrast to the historical masonry surroundings.
- v) Public realm improvements and improved landscaping are proposed directly in front of the Café/restaurant entrance which are also included within the development. This will optimise greening on St Cross Street and create space for pedestrians to dwell and users of the café space to spill out. The immediate locality is significantly lacking in public or green space, therefore the proposed improvements to St Cross Street should be noted as a major benefit of the proposals.
- vi) The design responds well to the neighbouring context and whilst, due to the tight urban context, there will be some impacts on local amenities in terms of outlook, daylight/sunlight and limited overlooking, these are considered minor. The scheme ensures that the surrounding residential buildings retain a good rate of compliance against the BRE criteria given the location.
- vii) The proposed building would also perform very well in terms of sustainability, achieving BREEAM 'Excellent', below the LETI 2020 benchmark for upfront embodied carbon and above the LETI 2030 benchmark for lifecycle embodied carbon.
- viii) The scheme also provides a policy compliant employment and training package incorporating apprentices, work experience placements and relevant employment contributions. This package, caught within employment and training plan ensures that the developer will engage with Camden's Local Procurement Code and relevant employment and training groups.

- ix) Overall the proposal removes a negative contributing building that has very little adaptability and replaces it with a flexible, high quality designed, sustainable commercial building which provides affordable workspace, new café use and improves the public realm around the site. The proposal therefore complies with policies outlined in Camden's Local Plan (2017).

OFFICER REPORT

Reason for Referral to Committee:

Major development involving the provision of more than 1,000 sqm of non-residential floorspace (Clause 3(i)); and subject to the completion of a legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).

1. SITE AND BACKGROUND

Location

- 1.1 The site comprises 0.145 Ha and is located within the London Borough of Camden. It is bound by St. Cross Street, Saffron Hill and Saffron Street. Figure 1 below shows the site plan.

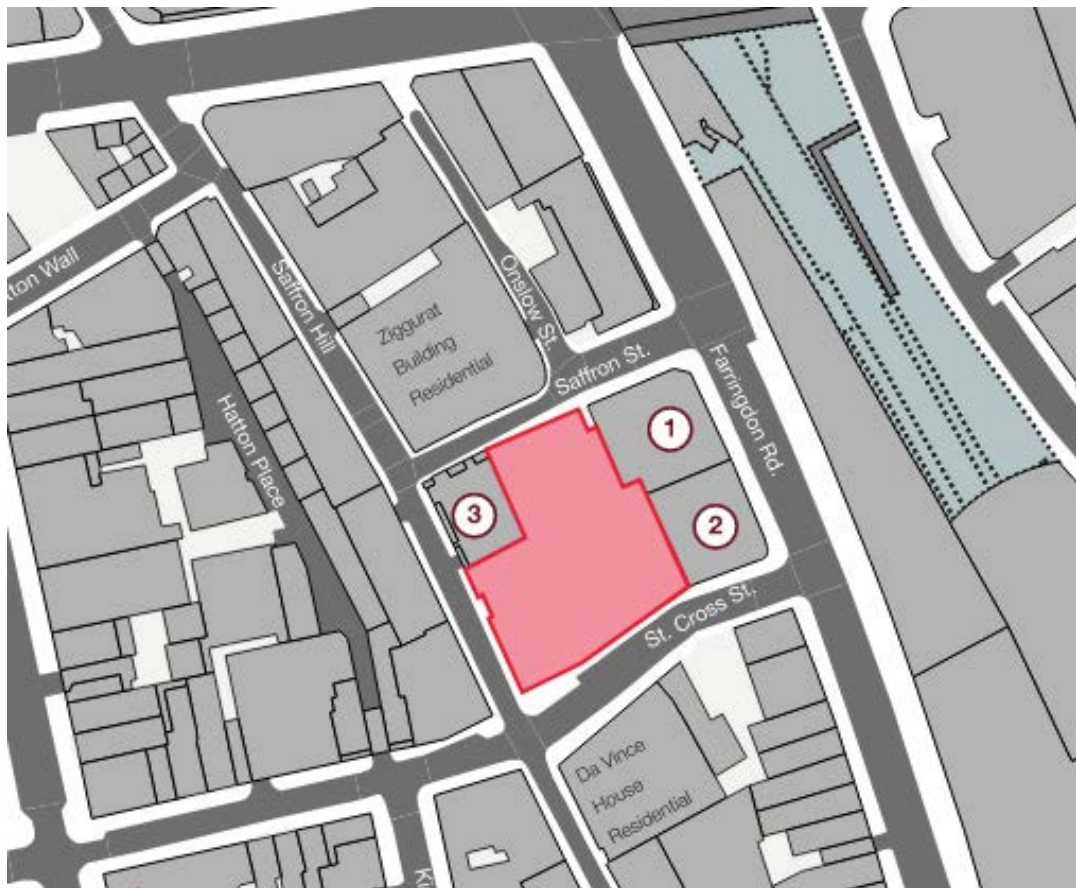


Figure 1: Site plan of development site

- 1.2 The site lies on the eastern edge of the Hatton Garden Conservation Area, and has been identified as a negative contributor within the conservation area audit.
- 1.3 The building that occupies the site comprises the Saffron Hill National Car Park (NCP). It consists of six storeys arranged across several split levels

with an office extension at 7/8th floor. The building has an irregular footprint and occupies much of the urban block bound by Farringdon Road, Saffron Street, and Saffron Hill.

- 1.4 The car park has a concrete frame with a mesh and sheet metal cladding system and is predominantly open on the south and west sides. Other façade materials include concrete panels and dark brown brick elements.
- 1.5 The existing building is neither listed nor subject to a Site Allocation. The site lies within the Central Activities Zone, as well as LVMF Protected Vistas 2A.1 and 3A.1. The site also lies within the Hatton Garden Special Policy Area.

Neighbouring uses

- 1.6 As with the Conservation Area in general the application site is surrounded by a mixture of uses including retail, office and residential. To the north is the Ziggurat building which is residential, to the east is 77-79 Farringdon Road which contains retail on the ground floor but has offices on the upper floors. To the west there is 55-59 Saffron Hill which contains residential apartments and office buildings on the other side of Saffron Hill to the south there is Da Vinci house which contains residential apartments as well as 20-24 Kirby Street which contains office accommodation. Below you can see the map which shows the site and surrounding uses.

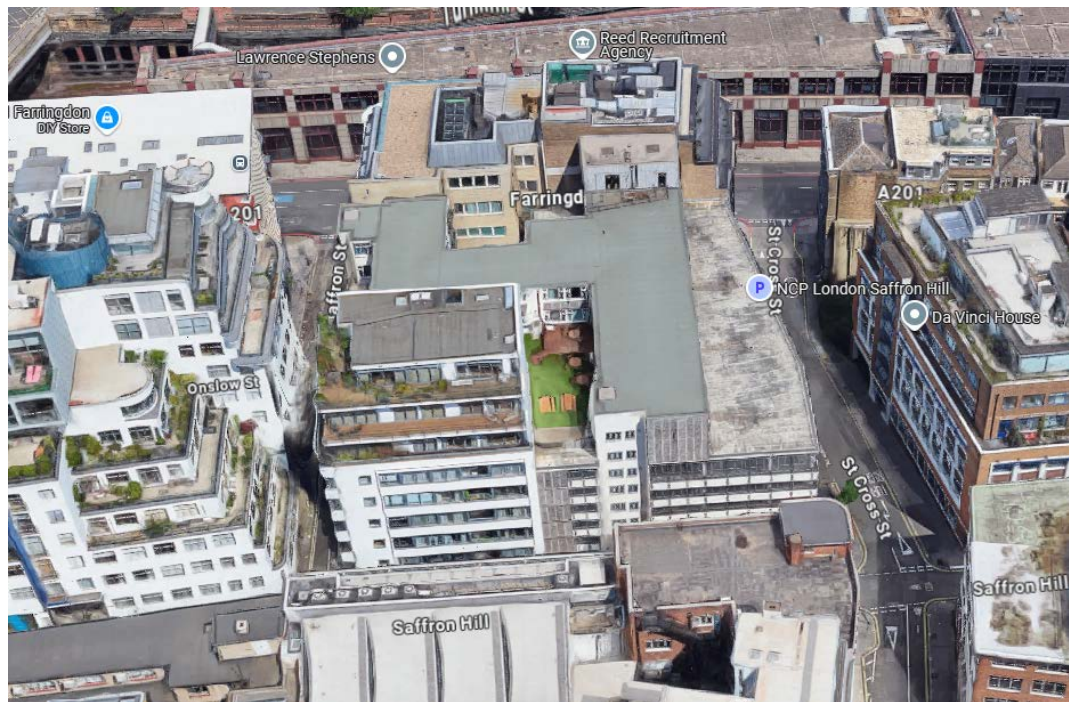


Figure 2: Map of site and nearby uses

- 1.7 The local topography is quite varied with different sized plots and buildings from different architectural periods giving this area a diverse character. Below are a few aerial images which demonstrate this point.



Aerial image of car park looking north east



Aerial image of car park looking east

Views

- 1.8 Designated LVMF Protected Vistas 2A.1 and 3A.1 cross the site at c.59m AOD. The proposal sits below these viewing corridors however the site is on a prominent corner and some key townscape views include:

- Looking west along Saffron Street from Farringdon Road
 - Looking east along St Cross Street
 - Looking north and west from the Saffron Hill/St Cross Street junction
 - Looking north along Saffron Hill
- 1.9 The narrow streets largely screen the building in local townscape views.

2. THE PROPOSAL

- 2.1 The proposal is to demolish the existing car park and erect a 8 storey office building with a new basement, green roofs, terraces, plant equipment, PV panels, cycle parking and separate retail and affordable workspace units
- 2.2 The building will include affordable workspace in the basement as well as cycle parking and refuse storage. On the ground floor a separate retail/café unit is proposed as well as the main office entrance with increased activation. As well as this public realm improvements, especially on St Cross Street will help improve the surrounding area and improve accessibility.
- 2.3 The building has been designed to incorporate sustainable-focused elements with the use of cross laminated timber for the floors, horizontal glazing and include passive ventilation measures within the façade.
- 2.4 The scheme includes multiple roof terraces which have a significant amount of planting and green infrastructure around them. There is roof top plant and PV panels also included.

Revisions

- 2.5 Following on from the pre-application process the scheme has been revised during the course of the application; by removing the terraces on the 5th and 6th floor to the north closest to the Ziggurat building. These areas will be inaccessible and will be replaced by planting

3. RELEVANT HISTORY

The site

- 3.1 N16/10/A/1397 – The erection of a multi-storey public car parking garage, with ancillary offices (Granted 13/01/1966)
- 3.2 PSX0204314 – planning permission granted on the 9th May 2002 for ‘replacement of existing crittal windows with white UPVC double glazed units’.
- 3.3 2012/4162/P – planning permission granted on the 8th October 2012 for ‘Alterations to existing roof terrace at 7th floor level in north-west corner fronting Saffron Hill, involving the replacement of existing uPVC windows

with doors, the installation of a raised deck area with ramp and the replacement of existing metal balustrade with new aluminium balustrade all in connection with the existing office use.'

The area

3.4 77-79 Faringdon Road, London, EC1M 3JY

PSX0205254 – planning permission granted on 24th August 2004 for 'Refurbishment and extensions to the rear and at roof level to provide B1 office space'.

3.5 67-74 Saffron Hill, London, EC1N 8QX

2018/5028/P – planning permission refused 2nd May 2019 for '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 due to concern over sense of enclosure and loss of outlook to 60-66 Saffron Hill (Ziggurat Building) (Appeal Dismissed 04/08/2020)

4. CONSULTATION

Statutory consultees

Greater London Authority (GLA)

4.1 The GLA with the following comments:

Land use

1. The redevelopment of the car park to provide substantial uplift of office floor space within the CAZ is strongly supported.
2. The provision of café floor space is supported.

Urban Design

3. The proposed height, mass and design of the proposed building are supported.

Heritage

4. The proposed redevelopment and replacement with a higher quality building is welcomed.

Transport

5. The healthy streets approach and cycle parking in accordance with London Plan policy should be secured by the LPA.

Sustainability

6. The energy statement does not comply with London Plan policies.

7. The development meets the 35% reduction of CO2 emissions compared to Part L of 2021 Building Regulations but falls short of the net zero carbon target in policy SI2. A carbon offset payment must be secured by the LPA.
8. Whole Life Carbon (WLC) statement submitted and condition should secure post construction assessment to report development's true emissions.
9. Condition be required securing further information in relation to the post construction and circular economy information.
10. A condition secures details of full fibre connectivity.

Environment and Ecology

11. The proposed development is a well-considered approach to integrating green infrastructure and urban greening. The scheme provides an acceptable urban greening factor of 0.3
12. The scheme's drainage strategy and SUDS are acceptable and details and maintenance should be secured via condition.
13. The proposal secures a net biodiversity net gain of 0.28 units and therefore accords with policy G6. A condition should be placed on the application to secure details and maintenance.

- 4.2 The GLA confirmed the comments above as well as the following:

As set out in the Stage 1 report, Camden Council do not need to refer the application back to the Mayor and the comments raised should be taken into account when Camden are determining the application. Therefore, these items should be resolved with Camden in their determination of the proposals.

Officer response: The Council accepts the position taken by the GLA and welcomes the assessment accepting the principle of development and design. The GLA have confirmed they have no objection to the proposals and the Council will be placing all recommended conditions on the application.

Thames water – No objection

- 4.3 The Thames Water comments are as follows:

- 4.4 The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission.

“No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.

Any piling must be undertaken in accordance with the terms of the approved piling method statement.”

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure

Officer Response: This position is shared by the Council and the condition will be imposed if permission is granted.

Greater London Archaeological Advisory Service (GLAAS) – No objection

- 4.5 GLAAS were consulted in relation to the proposed scheme.
- 4.6 The site lies in an Archaeological Priority Area due to its location on the periphery of the Roman and medieval city. GLAAS recommend a condition on the application requiring no development/demolition take place until a stage 1 written scheme of investigation (WSI) be submitted and approved. An informative outlining that written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England’s Guidelines for archaeological projects in Greater London is also recommended

Officer Response: This position is shared by the Council and the condition will be imposed if permission is granted.

Local groups

Hatton Garden CAAC

- 4.7 Hatton Garden – no reply to date.

Adjoining occupiers

Pre-application consultation by the applicant

- 4.8 Supporting the submission is the Design and Access Statement, Planning Statement and Statement of Community Involvement which detail the pre-application engagement undertaken by the developer with residents.
- 4.9 From the information provided, the applicant undertook a detailed public consultation, with a series of targeted public engagement activities held to present the proposed scheme to local residents and stakeholders between January and February 2024. As well as this, a website was established for the project and flyers were issued to 1,263 addresses in the local vicinity, inviting recipients to meet with the project team or provide their feedback.
- 4.10 A meeting with local residents was held on 19th February 2024, where several concerns were raised by residents including construction related impacts, daylight/sunlight impacts, overlooking and loss of privacy and plant

noise concerns amongst other issues. The applicant has provided information as to how these issues have been mitigated including incorporating the set back of terraces, soft landscaping and screening at terrace level, and a controlled construction logistics to mitigate adverse impacts on amenity.

Statutory consultation on the application by the Council

- 4.11 Three sites notice were displayed, as shown below:
- 1 x outside Car Park on St Cross Street
 - 1 x outside Car Park on Saffron Hill
 - 1 x outside Car Park on Saffron Street
- 4.12 The notices were displayed on 24/04/2024 until 18/05/2024 and the application was advertised in the local paper on 02/05/2024 expiring 26/05/2025.
- 4.13 Objections were received from 44 local households. The objections received by the Council are on the Council's website. The key issues raised are.

Impact on neighbouring amenity

- Impact on amenity due to the increase in height and massing.
- Daylight/sunlight report shows considerable overshadowing/loss of light for neighbouring residents.
- Greater weight should be given to protection of daylight/sunlight levels of Ziggurat Building.
- Previous applications have been altered to consider this issue.
- Terraces will increase noise and loss of privacy.
- Issues of overlooking especially for residents both Da Vinci House and Ziggurat Building.
- Increase of sense of enclosure due to height for both Da Vinci House and Ziggurat Building.
- Noise of plant equipment on top of building concerning.
- Precedents of other application's either being refused or appeals dismissed based on amenity grounds in the area.
- Concern that the scheme has changed little following the pre-application advice.
- DRP comments reiterate concerns over amenity impact.
- Private rights to light.

Officer response: issues in relation to loss of daylight, outlook, enclosure, noise are discussed in section 9 of the assessment below.

Land use

- Closing car park will impact on businesses in area.
- Lack of parking in area and will lose clients.

Officer response: the principle of the development is supported by the Local Plan policies and the aim of being a sustainable and car free borough. More information is provided in section 7 of the assessment below.

Design and heritage

- Height has increased.
- Massing of upper levels is concerning.
- Appears overbearing.
- Would contribute to overdevelopment.
- Impact on character of the area.
- Impact on conservation area and listed buildings.
- Increase of 4 storeys higher than the existing building.
- Materiality not positive.
- Questioned whether proposed plant could go in the basement.
- DRP comments reiterate concerns over size.

Officer response: design issues, in relation to character of area, height, scale, materials are all discussed in section 8 of the assessment.

Refuse

- Concern over refuse collection.
- Use of café and increased refuse collection.

Officer response: details are covered within section 19 of the assessment

Transport

- Noise during construction.
- Concerns over air quality from construction.
- Increased traffic.
- Safety concerns from construction.

Officer response: a construction management plan will be secured via s106 agreement to cover most of these points however this is discussed in more detail in sections 14 (Air Quality) and 16 (Transport) in the assessment below.

Other matters

- Developers using site as financial opportunity.
- The impact of demolition and replacement with a new building on party/common walls, especially in relation to 55 Saffron Hill – needs to

ensure the new structure is as solid as what it currently is and that it is well insulated.

- Consultation problems.
- Difference between proposed design and one presented at consultation.
- There will be a negative Impact on wellbeing of residents in relation to the loss of daylight, increased overlooking and construction issues.

Officer response: The financial nature/motivation of the scheme is not something the Council can consider within the planning assessment.

Concern over the common wall/ party wall issues for number 55 Saffron Hill are noted. Whilst not a material planning consideration if there are disputes in relation to this issue a party wall agreement must be agreed.

The consultation process has been highlighted within the statement of community involvement document which provides information on meetings, feedback and overall resident engagement.

Issues of design development are noted by the Council. .

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2023 \(NPPF\)](#)
[Draft National Planning Policy Framework 2024 \(NPPF\)](#)
[National Planning Practice Guidance \(NPPG\)](#)
[London Plan 2021 \(LP\)](#)
[London Plan Guidance](#)

Local policy and guidance

[Camden Local Plan \(2017\) \(CLP\)](#)

[Policy G1 Delivery and location of growth](#)
[Policy C1 Health and wellbeing](#)
[Policy C5 Safety and security](#)
[Policy C6 Access for all](#)
[Policy H2 Maximising the supply of self-contained housing from mixed use schemes](#)
[Policy E1 Economic development](#)
[Policy E2 Employment premises and sites](#)
[Policy A1 Managing the impact of development](#)
[Policy A2 Open space](#)
[Policy A3 Biodiversity](#)
[Policy A4 Noise and vibration](#)
[Policy A5 Basements](#)
[Policy D1 Design](#)
[Policy D2 Heritage](#)
[Policy CC1 Climate change mitigation](#)

[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC4 Air quality](#)
[Policy CC5 Waste](#)
[Policy TC1 Quantity and location of retail development](#)
[Policy TC2 Camden's centres and other shopping areas](#)
[Policy TC4 Town centre uses](#)
[Policy T1 Prioritising walking, cycling and public transport](#)
[Policy T2 Parking and car-free development](#)
[Policy T3 Transport infrastructure](#)
[Policy DM1 Delivery and monitoring](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Access for All CPG - March 2019](#)
[Air Quality - January 2021](#)
[Amenity - January 2021](#)
[Basements - January 2021](#)
[Biodiversity CPG - March 2018](#)
[Community uses, leisure and pubs - January 2021](#)
[Design - January 2021](#)
[Developer Contribution CPG - March 2019](#)
[Employment sites and business premises - January 2021](#)
[Energy efficiency and adaptation - January 2021](#)
[Planning for health and wellbeing - January 2021](#)
[Public open space - January 2021](#)
[Town centres and retail - January 2021](#)
[Transport - January 2021](#)
[Trees CPG - March 2019](#)
[Water and flooding CPG - March 2019](#)

Draft Camden Local Plan

The council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

6. ASSESSMENT

- 6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land use
8	Design and Heritage
9	Impact on Neighbouring Amenity
10	Health Impact
11	Basement
12	Landscaping, Trees and Open Space
13	Sustainability and Energy
14	Air Quality
15	Water, Flood Risk and Drainage
16	Transport
17	Employment and Training Contributions
18	Safety and Security
19	Refuse and Recycling
20	Contaminated Land
21	Fire Safety
21	Community Infrastructure Levy (CIL)
22	Conclusion
23	Legal Comments
24	Recommendation
25	Condition
26	Informatives

7. LAND USE

Loss of Car Park

- 7.1 Policy T2 (concerned with parking and car-free development) confirms that we will support the development of existing car parks for alternative uses. London Plan policy T6 (Car Parking) also supports Car Free development which includes no general parking. Furthermore London Plan policy SD7 (Town centres: development principles and Development Plan Documents) recognises the importance and capacity of car park sites for redevelopment to provide mixed use development.

- 7.2 Local Plan Policy G1 supports delivery of both homes, jobs and infrastructure. It expects development to make the best use of its site, and seeks a mix of uses. Growth is expected to be concentrated in identified growth areas and across Central London.
- 7.3 The policies above support the redevelopment of car park sites and removal of car parking infrastructure. In this case the site has a PTAL score of 6b which is the best and demonstrates the site is highly accessible by public transport. This further demonstrates the need for car parking is not a significant consideration or is an important element to supporting businesses in the area.

Provision of new office building

- 7.4 Local Plan Policy E1 directs development of new office development to the growth areas, Central London and the town centres. The site is not in an identified Camden growth area, but is in Central London Area, and located close to the new Elizabeth Line station at Farringdon, which is an area of employment intensification in adjoining parts of LB Islington and the City of London.
- 7.5 Policy E1 also promotes the Knowledge Quarter and associated growth sectors, including science. The Knowledge Quarter is focussed around King's Cross Station, but includes organisations as far as a mile away, encompassing the part of Central London within LB Camden. The draft Camden Site Allocations Local Plan Feb 2020 sets out the Council's emerging priorities for the Knowledge Quarter, which include floorspace suitable for life sciences, digital collections and machine learning, lab-enabled space, workspace suitable for start-ups and move-on businesses, and an element of affordable workspace. This has been superseded by the emerging Local Plan which incorporates the new site allocations. Overall the location is appropriate for the commercial use and where the Council aims to support the jewellery sector.
- 7.6 Policy E1 also indicates that we will promote and protect the jewellery industry in Hatton Garden. The Hatton Garden area boundary is shown on the Policies Map and encompasses the site.



Figure 3: Hatton Garden area boundary

- 7.7 Policy H2 states that ‘in all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.’
- 7.8 Paragraph 3.47 expands on Policy H2, stating that the Council has set a threshold indicating that the requirement applies to developments adding more than 200sqm (GIA or gross internal area) on the basis of the floorspace and ancillary space required to create a single self- contained home and a single commercial unit within a mixed-use development. Paragraph 3.48 gives examples of proposals that would not be required to provide housing:
- *the additional floorspace is 200sqm (GIA) or less;*

- *the development is in the designated Hatton Garden area, where the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character*
- 7.9 The proposed development includes new commercial office floorspace, replacing the car park, however proposes less than 200sqm of additional floorspace (an 117sqm uplift against the existing building). Moreover it is located within the Hatton Garden Area where the priority is to provide for the jewellery sector, thus qualifying as an exemption for the requirements of Policy H2.
- 7.10 In addition to the offices, part of the building will be a Class E (e) retail unit for a coffee shop which is self-contained and open to the public.

Affordable Workspace

- 7.11 Policy E2 of the Local Plan states that within the Hatton Garden Special Policy Area, where proposals would increase the total gross internal floorspace by more than 200sqm, the Council will seek for 50% of the additional floorspace as affordable premises suitable for the jewellery sector. In the context of this policy, it is important to note that the proposed development will not increase the total gross internal floorspace of the existing building by more than 200sqm. As a result, Policy E2 'Hatton Garden' is not applicable to the development.
- 7.12 However, Policy E2 of the Local Plan more generally encourages the higher intensity redevelopment of premises or sites that are suitable for continued business provided that the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable. The Employment Sites and Business Premises CPG document also provides guidance as to what sort of affordable workspace the Council will seek to secure. Paragraph 36 states that "We will also seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA or gross internal area) or more". This element of Policy E2 is relevant to the consideration of this application.
- 7.13 Where workspace has been specified as affordable, the Council's Inclusive Economy Team work with developers to agree appropriate terms of affordability on a case by case basis. As a general guide the CPG seeks for a target of 20% of the workspace to be provided at 50% of comparable market values.
- 7.14 The proposed development will provide 586sqm of affordable workspace, largely provided on a single floorplate at basement level, but also benefitting from a dedicated ground floor entrance on Saffron Street. The overall provision will represent 6% of the proposed office uplift, and is considered

to be a meaningful offer that will create space for small and medium-sized businesses in Hatton Garden. Whilst the quantum is below the 20% suggested by guidance, it is considered to be a meaningful level of provision on site. Having 586sqm of affordable workspace dedicated to jewellery occupiers in this area and of this quality means there is considerable benefit provided. Due to the bespoke nature of the affordable workspace, this will be discounted at 50% of market rent value and for the lifetime of the development. This will be secured via s106 agreement. To ensure compliance with policy E1 and E2 above the affordable workspace will be secured as jewellery workspace via s106 agreement and captured within a commercial space plan.

- 7.15 Overall the principle of a commercial office building, which provides a separate Class E retail unit and affordable workspace is considered acceptable. Therefore the application complies with H2, E1, E2 of the 2017 Local Plan

8. DESIGN AND HERITAGE

Historic development and surrounding townscape

- 8.1 The Hatton Garden Conservation Area covers approximately 20 hectares west of Farringdon Road. Its historic character derives largely from its many robustly detailed industrial, commercial and residential buildings of the late nineteenth to mid twentieth centuries, combined with an intricate street pattern that is overlaid on undulating topography. This character is closely related to the history of metal working and other industries that have been carried out here. At the heart of the district is Hatton Garden, well known as the focus of London's jewellery trade.
- 8.2 Sub-area 5 comprises a strip of land between the quiet backwater of Saffron Hill and the busy, highway-dominated Farringdon Road. The east side of Saffron Hill was once densely built up with narrow houses backing onto the River Fleet, cleared when Farringdon Road was created in 1841-56. Since then, redevelopment has generally created slightly taller buildings than those in Sub-area 3. The gently winding course and narrowness of Saffron Hill are important reminders of the medieval street pattern, but the south end has lost much of its historic character through simplification of the street plan and the amalgamation of plots for large office buildings.
- 8.3 The buildings of Farringdon Road sub-area fall into two broad categories: narrow nineteenth-century brick warehouses and workshops fronting Farringdon, given a degree of decoration due to their prominent site, and larger, more recent buildings on Saffron Hill and its side streets, most of which lack a distinct character owing to a large amount of rebuilding since the Second World War. 17 Charterhouse Street was built in the late 1970s and early 1980s for De Beers. It features facades clad in good quality

Portland stone the ground floor but, reflecting its need for high security, the ground floor is somewhat defensive and could be improved. The back of the building is fully glazed and faces onto Saffron Hill.

- 8.4 The survival of many original plot widths lends a satisfying rhythm to the east side of Hatton Garden and to both sides of Greville Street and St Cross Street. However, the west side of Hatton Garden and both sides of Kirby Street have a weaker character owing to the amalgamation of many of the original plots. Saffron Hill has never had regular plot widths imposed upon it but possesses a marked character of its own, the building line closely following its gently winding and undulating course, serving as a reminder of its medieval origins. Saffron Hill a residential/commercial finger between the more commercial Farringdon Road and specialist retail/workshops of Hatton Garden.
- 8.5 There is an opportunity to enhance the Conservation Area through high quality design that respects the historic built form and character of the area. Important considerations will include the building lines, roof lines and bay rhythm of adjacent properties. Plot widths are also particularly important. In the past, these have often been amalgamated into larger plots, damaging the 'urban grain' and character of the Area. Therefore, new development should preserve the visual distinction of existing plot widths and, where possible, reinstate some sense of the visual distinction of lost plot widths.
- 8.6 Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the conservation area under s. 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

Assessment of proposals

Design Response

- 8.7 The proposal was considered by Camden's Design Review Panel prior to the application being submitted and the scheme design has had regard to the panel's comments (see relevant subsection below). The proposed building is a confident forward-looking piece of architecture that is driven by environmental performance and low embodied carbon principles. The proposed development places sustainability at its core, targeting low embodied carbon to align with LETI 2020 benchmarks. Early design decisions, including the structure, facade, and MEP systems, have a critical impact on the project's carbon footprint. As a result, the project features a lightweight hybrid structure, a facade with efficient, user-controlled skin, and a streamlined, expressed frame.
- 8.8 The sustainable and biophilic approach results in a building that positively engages with the surrounding streets and sets a benchmark for a bold and

sustainable architecture in an eclectic conservation area that has experienced piecemeal development of varying quality in recent times.

Ground floor layout and public realm

- 8.9 The proposed building replicates the footprint of the existing car park, which occupies the majority of the western half of the urban block bound by Farringdon Road, Saffron Street, Saffron Hill and St Cross Street.
- 8.10 A range of commercial uses are proposed to activate street frontages, including a café, main office reception, a standalone commercial unit and affordable workspace, and cycle entrance. The variety of uses and number of entrances will contribute to a lively and mixed street character and aligns with key design policies.
- 8.11 Located on the south west corner of the building, the café unit will engage positively with the junction of Saffron Hill and St. Cross Street. The entrance is recessed and creates more pavement space around the corner of the building, which shows more generosity to the public realm than the current building. Further along the St Cross Street façade are two office entrances, providing direct access into the flexible office space proposed at ground floor, and into a separate lobby giving access to upper floors. The affordable office entrance is located on Saffron Hill, giving access to the lower ground workspace together with a light-well to bring light into the office spaces. Refuse and cycle entrance for the building is accessed from Saffron Street. This will constitute a dedicated and clearly expressed cycle entrance, which will provide welcome activation where the existing building presents a defensive facade.
- 8.12 The provision and location of entrances will help to enliven the ground floor along all three sides of the building, engage with the prominence of the corner of St Cross Street and provide a better relationship with the streetscape in the round.
- 8.13 The landscape proposals indicate a widened pavement on St Cross Street and the removal of motorcycle parking, together with the introduction of planted areas, rain gardens and new street trees. This approach is supported and picked up within the public realm improvements contribution with the final design developed further within the post-approval phase via condition

Scale and massing

- 8.14 The proposal for the new building is 8 storeys, which is the same number of storeys as existing. However, as a result of the very low ceiling heights of the existing car park, the building height will increase from 41.64m AOD to 52.2m AOD. The neighbouring Ziggurat building is also 8 storeys and a height of 52.88m AOD.

8.15 The approach to the proposed building's massing responds to its tight urban context. The upper three storeys stepping back incrementally from a 5-storey shoulder height. This approach is seen in the immediate townscape, for example in the Ziggurat building, and 55 Saffron Hill (Alan House) immediately adjacent to the site. This stepping back of upper floors successfully mediates the scale in the surrounding streets to prevent an overbearing sense of enclosure. Figure 4 below demonstrates these distances and the relationship between the Ziggurat building and Da Vinci House

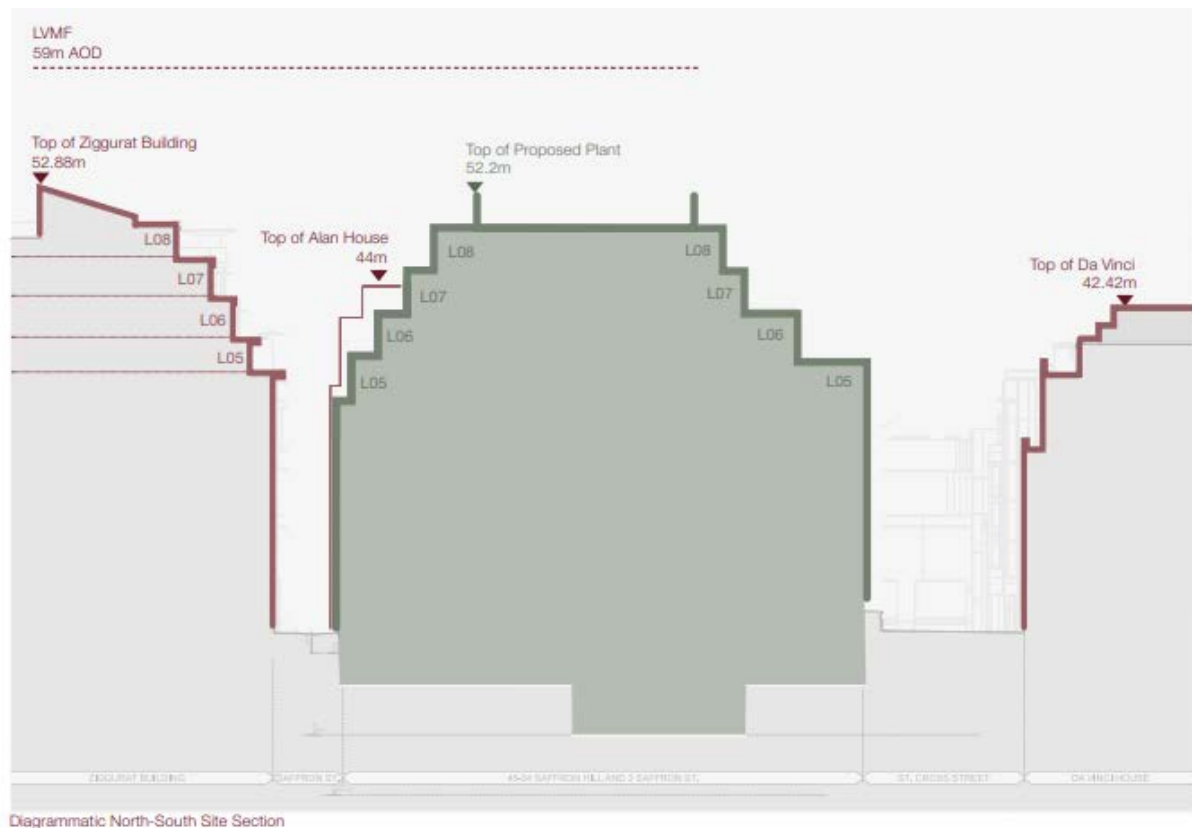


Figure 4: showing the scale and massing of the proposed building in context

8.16 In addition to its setting within the context of the wider area, consideration has been given to the way the building directly relates to its neighbours: several devices have been employed to break down the massing of the building, particularly where visual impact and amenity is most sensitive. The upper floor set-backs have been modelled to limit visibility in the surrounding streets and to respond to amenity impacts on the upper floors of neighbouring buildings.

8.17 The building line along St. Cross Street cranks and provides a generous contribution to the townscape and ensures there is interest and relief to the streetscape. This is particularly positive in views east and west along this street. The building angles back and improves the area of public realm at the corner of St. Cross St and Saffron Hill. Deep set backs are also

introduced along this southern elevation at upper levels to increase biodiversity and ensure privacy and daylight impact is mitigated in relation to Da Vinci House on the southern side of St Cross Street.

- 8.18 Through engagement with neighbouring residents the massing strategy has been further refined and informed by daylight and sunlight considerations. The distance between the lower Ziggurat floors and the existing building is c.6.2m. The proposed development improves this to c.6.5m. The design proposes to stagger the floors by half a storey with those of the Ziggurat to mitigate overlooking. Additionally, tall buffer planting 1m deep has been proposed which will be important in order to ensure privacy between facing windows.
- 8.19 Overall, the massing has been carefully composed and modelled to respond to the surrounding buildings and three different street contexts.

Detailed design and materiality

- 8.20 The guiding design principles are of a sustainable, biophilic design, which has informed the architecture through the choice of low carbon materials, expressed solar shading and urban greening.
- 8.21 The internal steel structure is expressed on the external façade to maximize efficiency and provide a simple series of architectural bays. This frame defines the building's volume but also adds depth and shadow to the facade, simultaneously providing shade for interior spaces. Its slim-profile steel extrusions are designed for lightweight efficiency, reflecting low-carbon principles and forming a distinct contrast to the historic masonry surroundings.
- 8.22 This frame enables the foundations and piles of the existing building to be retained. It provides passive shading, supports planters, brise soleil, and spandrels, to control overheating. By reducing the need for mechanical heating and cooling, it contributes to energy efficiency. Additionally, in order to reduce the upfront embodied carbon of the facade, the proposals seek to utilise recycled content within the steelwork finished in a lightweight, high quality, bronze toned finish, such as bespoke PPC. Figure 5 below shows the typical façade overview with the proposed materials as set out above



Figure 5: showing typical façade overview and proposed materials

- 8.23 The building prioritises structural and environmental performance and minimises the emphasis on external cladding. However, in order to ensure the building complements its setting, the design focuses on the scale and rhythm of the façade, with bays adapted to be sympathetic to the local context. A golden bronze finish on the frame further blends it with the existing masonry palette, integrating the new structure into the urban fabric.
- 8.24 As the building shifts round to the north on Saffron Street, a more pared back detailing around the windows is proposed to respond to the climatic conditions where solar shading is not needed. This façade has been designed to respond to the proportions of the neighbouring warehouse building on Farringdon Road and takes the hierarchical ordering principles, so as to be sympathetic to its neighbour.
- 8.25 Planters are used to cap the building, providing a deliberate but soft edge at the shoulder height. The extent of planting proposed along deep terraces adds interest to the facades and is welcome in this proposal. The plant enclosure is also screened with planting which is an important component of the design, and is required to ensure there is reduced impact on resident amenity.
- 8.26 The ground floor adopts a more solid materiality, combining concrete with timber-framed windows and doors to create a tactile and human scale to the street. Along St. Cross Street the concrete elements work with the level changes to create planters and benchers, and together with opening

windows results in a lively and engaging façade. The same principles of solidity, greening, high quality tactile materials, and distinct bay fenestration apply to the ground floor facade along the west and north elevations.

- 8.27 The design relies on the quality of materials and detailing. Due to their quality and robustness they are welcomed in this proposal. These should therefore be conditioned to ensure a building of the highest quality with a durable finish that weathers gracefully. As well as this an architects monitoring and retention clause will be included in the s106 agreement in order to ensure the original architects continue with the project

Impact on Conservation Area

- 8.28 The conservation area is marked by a diverse material palette, primarily consisting of masonry materials. The Hatton Garden Conservation Area Management Strategy identifies 15 buildings which make a negative contribution which includes the site. Paragraph 6.4 states that:

There are approx. 15 buildings which are identified by Camden as 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

- 8.29 In this case, because the NCP car park sits below much of the surrounding buildings and is constructed with unsympathetic materials with an overall negative design, it is clear the issues relate to materials, design and its failure to address the street in an appropriate way. The proposed scheme, within the conservation area context successfully addresses these issues and therefore, reasons why the current building is listed as a negative contributor overall creating a building which preserves the character of the conservation area but significantly improves the impact in relation to the current building.
- 8.30 Sub-area 5's (Faringdon Road) mix of styles and rhythms allow room for a facade articulation and material choice focused on low carbon design. In this way the proposed materials celebrate and reflect the eclectic mix of building styles and materials found within this part of the Hatton Garden Conservation Area. At ground floor the timber façade system responds to the crafted history of the jewellery quarter. As a whole, the façade design offers a unique quality and aesthetic, and this approach to the material strategy from a design and heritage perspective is supported.

Design Review Panel (DRP)

- 8.31 The proposals were seen by the DRP on 15 September 2023. The panel were supportive of the design strategy, including the height, scale and architecture. The consideration of sustainability and achieving a highly sustainable building was also welcomed.

- 8.32 However concerns were raised over the impact on amenity of the Ziggurat building, the overall scale of the 'exoskeleton' which felt like a larger grain than surrounding buildings as well as ensuring that ambitious sustainability targets have been set in the process. Of particular concern was the activation on ground floor and relationship the building has to the street and how landscaping should be incorporated as an integral part of the development.
- 8.33 A number of changes were made to the scheme to address some of the comments and issues raised by the panel. Whilst the principles of the design have remained, the scale has been slightly reduced and further mitigation measures included like setbacks and planting to ensure the amenity of residents have been fully considered. You can see in figure 6 below which demonstrates the development of the landscaping and planting within the building. On the top is the views from the DRP proposal and below are the current scheme and associated landscaping.



Figure 6: Showing comparison of the scheme when taken to DRP (top) and currently (bottom)

- 8.34 The Council have also continued in pressing the sustainability issue and ensuring the building performs as well as it can and the design of each elevation incorporates design principles that align with the LETI (London Energy Transformation Initiative) Climate Emergency Design Guide. This includes passive strategies to reduce energy expenditure through façade depth and solar shading to mitigate solar gain and operable windows to reduce cooling demand in summer.
- 8.35 Changes have also been made to the ground floor, reducing the scale of the components and ensuring that its relationship is much more seamless and comfortable.
- 8.36 Following the panel's comments landscaping has become an important part of the scheme and St Cross Street especially, is proposed to undergo significant changes to improve the accessibility, public realm and overall landscaping of the street.
- 8.37 It was considered that the changes made sufficiently addressed the comments made by the panel and therefore needed no further review.

Conclusion

- 8.38 This high quality contemporary design response draws on surrounding influences, responding creatively to the site and is welcomed. The removal of a negative contributing building and replacing it with a highly quality designed building which now preserves the character of the conservation is supported from a heritage perspective.
- 8.39 It is considerate of its neighbouring buildings and confidently approaches the relationship in a manner that is seen in several instances throughout the conservation area and acknowledges the emerging development context.
- 8.40 The proposals show generosity to the public realm, and would help to activate the streets more successfully than the existing building. Composition and detailing have been well considered and this proposal demonstrates a high quality example of how to positively plan for growth in a historic environment. The considered attention to the composition of the façades and intricate detailing would enhance the architectural character of the existing street.
- 8.41 Overall the proposal complies with D1 and D2 of the 2017 Local Plan

9. IMPACT ON NEIGHBOURING AMENITY

- 9.1 Local Plan policies A1 and A4 and the Amenity CPG are relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant

but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

- 9.2 The Amenity CPG, and the BRE Guidelines focus on impacts to residential properties with protection of their amenity being given greater weight. Paragraph 3.7 of the CPG states:

“Although it is normally only residential uses that are assessed, there may also be non-residential uses, existing nearby or proposed as part of the application, that are particularly sensitive to light and so justify a report.”

- 9.3 In this case there are some office (non-residential) uses surrounding the development including on:

- 14 St Cross Street
- 91-94 Saffron Hill
- 73 Farringdon Road

- 9.4 However considering the location and proximity to the site as well as the proposed height and scale of the proposal development, it is not considered that these properties will be adversely impacted.

Daylight and sunlight

- 9.5 A Daylight, Sunlight and Overshadowing Report has been submitted as part of the application which details any impacts upon neighbouring properties.

- 9.6 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement. The site location is within a Central London Location and in a highly dense urban grain and so as per BRE guidance documents (2022) and the Council's Amenity CPG document, guidelines should be applied appropriately to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets.

- 9.7 Paragraph 129 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

9.8 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several standards in its assessment of surrounding buildings which are described in the BRE guidance:

- **Vertical Sky Component (VSC)** – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
- *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
- **No Sky Line (NSL)**, also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
- *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
- **Annual Probable Sunlight Hours (APSH)** - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
- The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.
- The **overshadowing** of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology.
- The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March, and the area which can receive some sun on the 21st March is less than 0.8 times its former value.

Categorising impacts and alternative targets

9.9 The assessment has set significance criteria which is the approach recommended by BRE guidance.

BRE compliant	20.1% to 30% reduction	30.1% to 40% reduction	More than 40.1% reduction
Negligible	Minor Negative	Moderate Negative	Major Negative

Table 1 – Typical Impact criteria

- 9.10 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context. The approach is supported by the London Plan. The LP Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

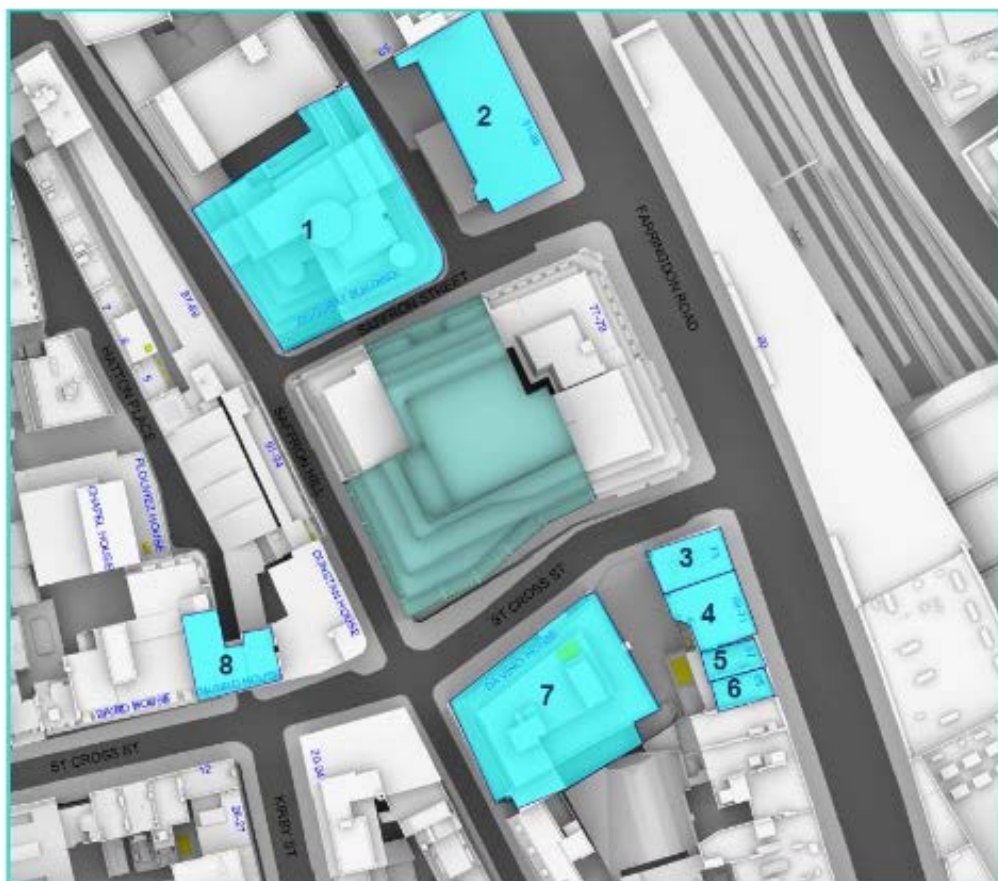
- 9.11 Whilst not a housing scheme in this case it is still considered that similar principles extend to optimising the use of valuable sites in the central area while still achieving reasonable expectations for daylight and sunlight for existing residents.
- 9.12 For urban development densities found more typically in Camden such as Holborn, Covent Garden and Hatton Garden planning officers have noted that VSC values of 15% to 20% can be tolerated as an acceptable norm. There will always be the higher values of 27% and above found in dwellings on upper floors or facing across open spaces like parks, squares and larger gardens, while at the same time VSC values of less than 10% are common, more usually for secondary windows such as those facing into alleyways and lightwells. The reliance on artificial lighting for such rooms can be accepted, especially where the room itself also serves a secondary function or used more at night-time such as a bedroom.
- 9.13 The daylight/sunlight report submitted with this application used a Contextual Site Analysis to consider similar, recently built and consented schemes in London (referred to as 'contextual sites'). The analysis concluded a retained VSC value within the mid-teens. This VSC score can be considered an acceptable level of retained daylight for the surrounding properties, which is in line with the BRE guidelines as described above.
- 9.14 Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where there are balconies which can cause obstruction, the BRE guidelines suggest modelling the impacts with and without the balconies. This allows you to test whether the presence of the balcony or overhanging walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light.

Assessment

- 9.15 The assessment has focused on the buildings within close vicinity of the site and of more sensitive uses. Below *figure 7* references the buildings on the respective map that have been tested. The properties tested are accepted as these are the most sensitive.

Plan Ref	Property
1	Ziggurat Building
2	81-89 Farringdon Road
3	73 Farringdon Road
4	69-71 Farringdon Road
5	67 Farringdon Road
6	65 Farringdon Road
7	Da Vinci House
8	Munro House, 14 St. Cross Street

The location of each of these properties can be identified in the drawings located in Appendix 1 and also numbered in the image below:



Property Location Plan

Figure 7: tested buildings

- 9.16 Across the site there is a large overall percentage of compliance across the three tests; VSC, NSL and APSH. The sections below will analyse the

impact of each building. Below shows the table of the site wide daylight/sunlight compliance in relation to the reduction as set out in table 2. To be clear windows on properties with the plan ref above of 3, 4, 5, 6 and 8 all meet BRE guidance and will therefore not experience any adverse impacts on daylight and sunlight.

Assessment	No. of rooms	BRE compliant	20.1% to 30% minor reduction	30.1% to 40% moderate reduction	More than 40.1% Major reduction
VSC	348	288 (83%)	33	18	9
NSL	131	119 (91%)	6	3	3
APSH	81	78 (96%)	1	1	1

Table 2: showing site wide compliance

81-89 Farringdon Road

- 9.17 All windows tested meet the BRE guidance for both VSC and APSH. One window serving a fourth floor bedroom marginally fails the NSL assessment experiencing a relative reduction of 22.2% - just over the BRE guidance. However on balance the proposed area that will still benefit is still substantial (72sqft) and therefore there will still be an acceptable area of the room where the sky can be seen. Overall the impact on this building is acceptable.

Ziggurat Building

- 9.18 This residential apartment block is located immediately to the north of the site on the opposite side of Saffron Street. The building comprises of loft style apartments arranged across 10 floors. In total, there are 19 flats that have a view of the site and have therefore been assessed for both daylight and sunlight. The relationship between the existing car park and Ziggurat building is tight and narrow, separated by a one way street. Figure 8 below shows this relationship clearly:



Figure 8: relationship between the NCP car park and Ziggurat Building

9.19 From the results 173 windows were tested for VSC, 24 for NSL and 4 for APSH. All passed for NSL, three failed for APSH and 37 failed in terms of VSC. Table 3 below outlines these results.

Assessment	No. of rooms	BRE compliant	20.1% to 30% minor reduction	30.1% to 40% moderate reduction	More than 40.1% Major reduction
VSC	173	136 (78.6%)	19	11	7
NSL	24	24 (100%)	0	0	0
APSH	24	21 (87.5%)	1	1	1

Table 3: showing site wide compliance

- 9.20 It is noted that 37 windows fall short of the numerical targets in relation to VSC which is not an insignificant number. However there are various factors that have influenced the results which should be noted. All windows have been assessed for the Ziggurat building however the report will touch on specific examples which speak to a wider trend in the results for this building.
- 9.21 On the lower floors, 14 windows fail the BRE guidance with relative respective reductions of 20.1% - 30.34%. However when looking at the existing levels these are starting at a very low level to begin with and therefore the actual loss is small. An example of this are the windows on the first floor serving flats 1.5 and 1.4. Below are the window maps and indicative floor plans:

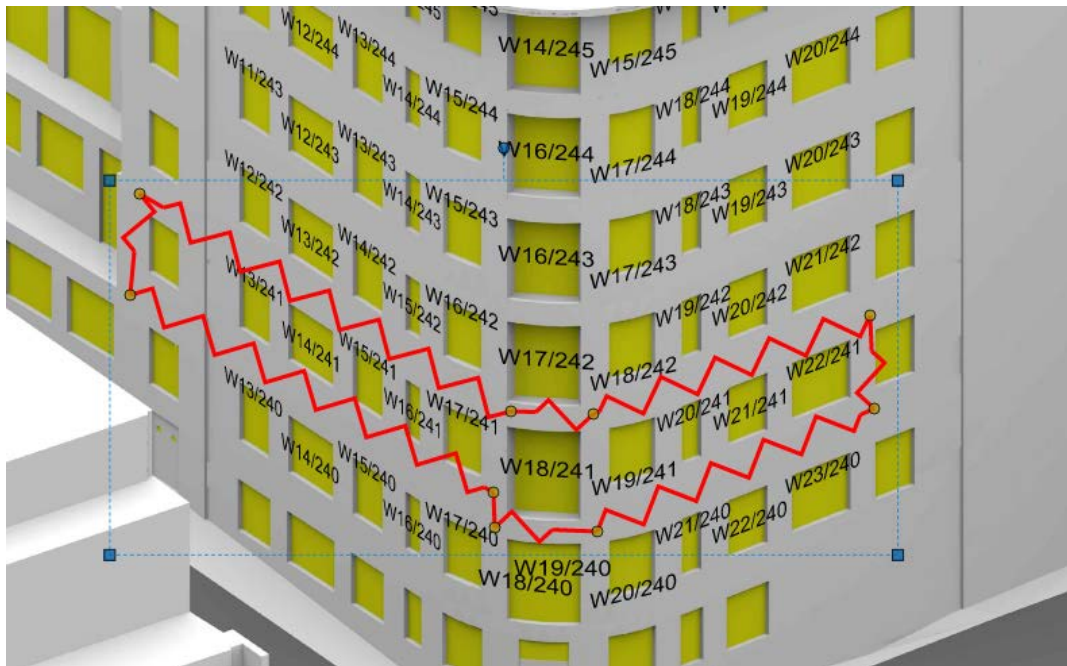


Figure 9: showing discussed windows



Figure 10: floor plan of Ziggurat building

- 9.22 For Flat 1.5, the reductions are 20.21%, 22.44% and 21.99% for the three windows shown above and so all fail the BRE guidance. However the actual loss ranges from 1.17 – 1.36 in the VSC score. Given the lower level location, facing across a very narrow street and the relatively small loss these windows undergo, a flexible approach can be taken in assessing the percentage scores and losses. These all appear to serve the same studio room as well. Overall these changes will make a small difference to the daylight scores of this unit and is therefore acceptable.
- 9.23 For Flat 1.4 there is a single reduction of over 20% however every other window passes BRE guidance and all appear to serve the same room.
- 9.24 Moreover, windows on the fourth floor and above there are 23 windows experiencing reductions beyond guidance however due to the open plan nature of the apartments, these rooms are lit by other windows which meet the BRE guidance, and in some cases are also in excess of the BRE 27%.
- 9.25 An example of this are the windows for the apartments directly opposite the proposed building on the fourth floor. Below is the window maps and indicative floor plan showing where the units and tested windows are located:



Figure 11: showing discussed windows



Figure 12: floor plan of Ziggurat building

- 9.26 From the floor plans you can see that W8/244 – W12/244 serves one unit (Flat 4.5) and W13/244 – W20/244 serves the other unit (Flat 4.4)
- 9.27 For Flat 4.5, windows W10, W11 and W12 have losses of 34.31%, 38.11% and 38.48% respectively. However windows W8 and W9, which also serve

the same room, experience no loss and keep their scores of 25.50% and 26.64% which is high considering the dense urban location.

- 9.28 Looking at Flat 4.4, the results are similar; windows W13, W14 and W15 have reductions of 36.96%, 34.10% and 25.93% respectively. However the other five windows all meet BRE guidelines and four out of the five have BRE score of over 30%. This means that whilst there is some significant loss, other windows serving the same room retain their high scores meaning that the impact is lessened and not considered adverse.
- 9.29 The flats in the floor above also have losses of between 20% - 62% however, again, have windows serving the same room with no change and high existing scores. Overall, in terms of VSC, whilst there is an impact, the overall level, in the context of the location and percentage losses, and taking account of the layout of the neighbouring properties and that multiple windows serve spaces, is not considered adverse and therefore acceptable.
- 9.30 Finally there are a number of windows on the fifth floor that record high percentage losses. Considering their location, this is partly down to the projecting part of the building which is directly above them and makes them more sensitive to impacts.
- 9.31 Looking at the worst affected windows these relate to Flats 5.5 and 5.4. figure 13 below shows the indicative floor plans and window maps showing the windows in question:

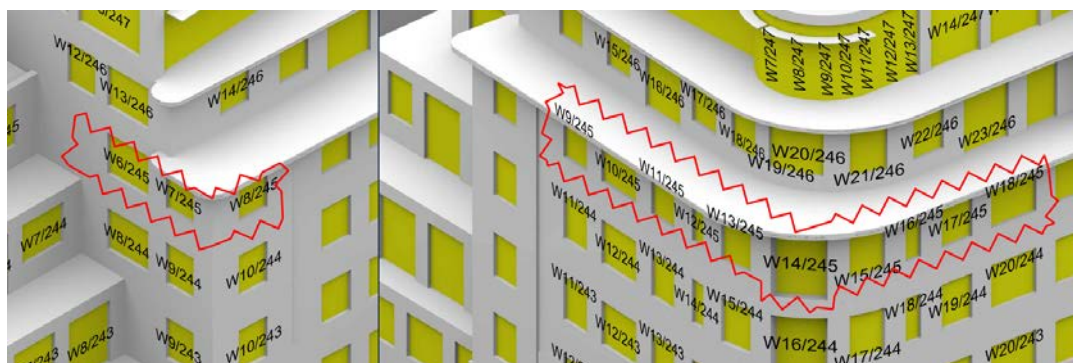


Figure 13: showing discussed windows

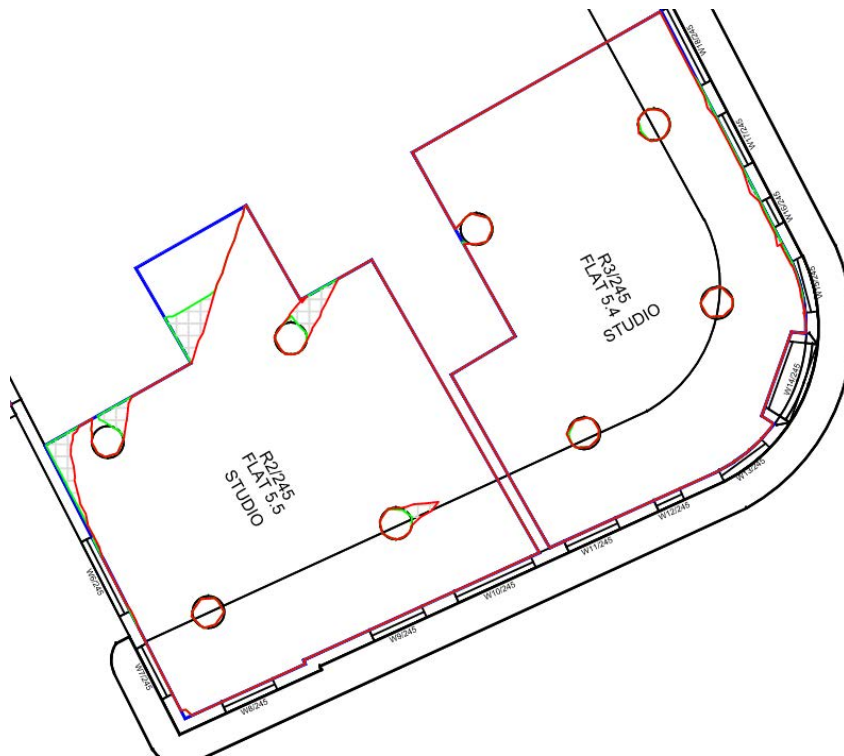


Figure 14: floor plan of Ziggurat building

- 9.32 For Flat 5.5, windows W8, W9 and W10 have losses of 51.71%, 62.11% and 62.85% respectively. However windows W6 and W7, which also serve the same room, experience no loss and keep their scores of 29.99% and 24.42% which is high considering the dense urban location.
- 9.33 Looking at Flat 5.4, the results are similar; windows W11, W12 and W13 have reductions of 61.77%, 59.00% and 47.64% respectively. However the other five windows all meet BRE guidelines and four out of the five have BRE score of over 27%. This means that whilst there are cases of some significant losses for particular windows, the rooms they benefit also have other windows which retain their high scores. This means that the overall impact is much reduced and not considered adverse.
- 9.34 In terms of APSH, as per table 3, 21 of the 24 southerly orientated habitable rooms tested will meet the BRE guidelines for both annual and winter sun. Out of the three rooms that fail, two comfortably exceed the BRE 25% annual APSH target (retaining 49% and 52% APSH). Whilst the third window would retain 16% APSH (which is a reduction of just 6%) this represents just a 27% relative reduction in annual sunlight which is considered minor in nature in the context of an urban location. There would also be no alteration in winter sun to this room. In terms of winter APSH, there are only two rooms that fall short of the BRE guidelines, one of which experiences a reduction of just 1% APSH (but the room continues to receive 49% APSH annually) and the other experiences a reduction of 5% APSH, but retains 4% APSH which is just 1% short of the BRE target of 5%

in

winter. Again, the room in question retains 52% APSH annually, which is well in excess of the BRE 25% target. It is acknowledged that there will be some loss in winter sun to individual windows that exceed the BRE guideline numerical targets, which is not uncommon in built-up urban environments where winter sun is more sensitive and building to building relationships make access to direct sunlight in winter more challenging

Da Vinci House

- 9.35 Da Vinci House is a mixed use, predominately residential building with commercial on the ground floor. The daylight/sunlight assessment asserts that there is a total of 15 flats within the property that have windows facing the proposed development.
- 9.36 The assessment covered 68 windows on this front elevation which serve 44 habitable rooms across the building. Below table 4 summarising the results:

Assessment	No. of rooms	BRE compliant	20.1% to 30% minor reduction	30.1% to 40% moderate reduction	More than 40.1% Major reduction
VSC	68	45 (66.2%)	15	6	2
NSL	44	33 (75%)	5	3	3
APSH	8	8 (100%)	0	0	0

Table 4: BRE site wide compliance

- 9.37 In terms of VSC, over 66% of windows meet BRE guidelines and therefore do not need to be assessed further. 15 windows experience minor reduction of 20%-30% and 8 windows experience moderate to major reduction. The majority of the 15 windows that undergo a minor reduction fall within the windows as outlined in figure 15 below.

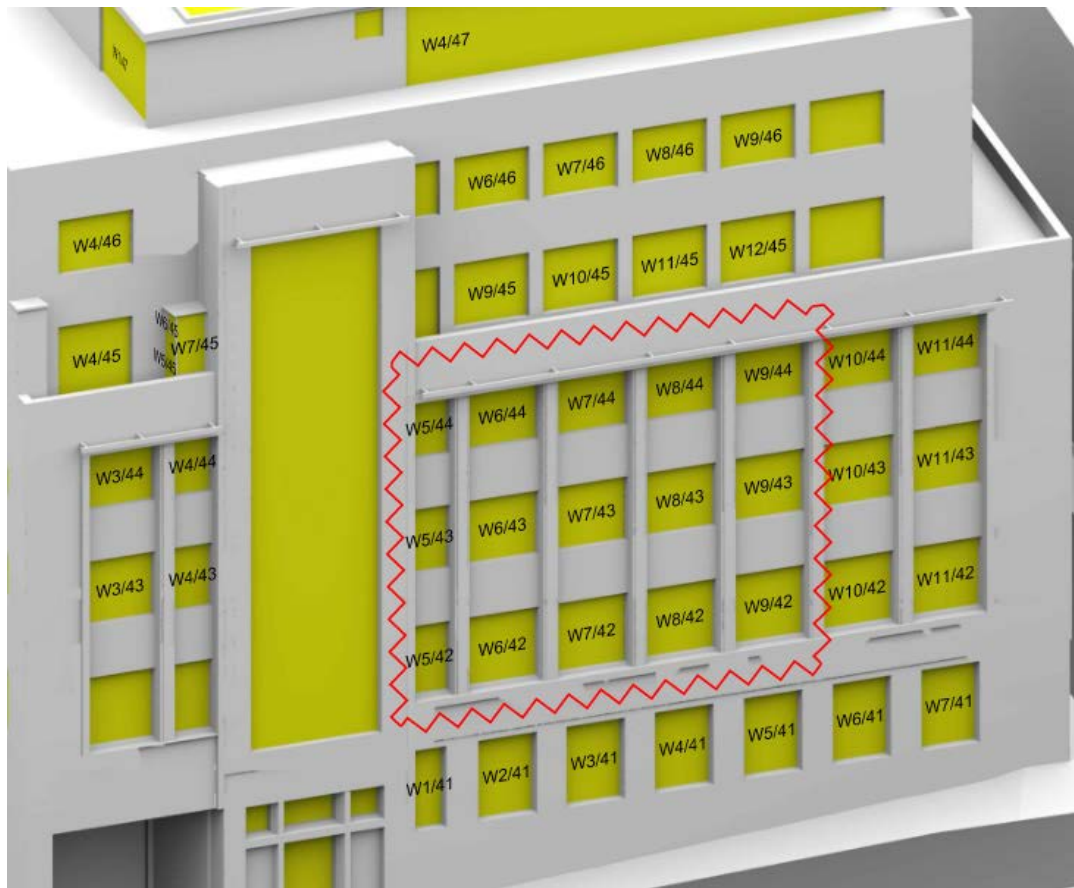
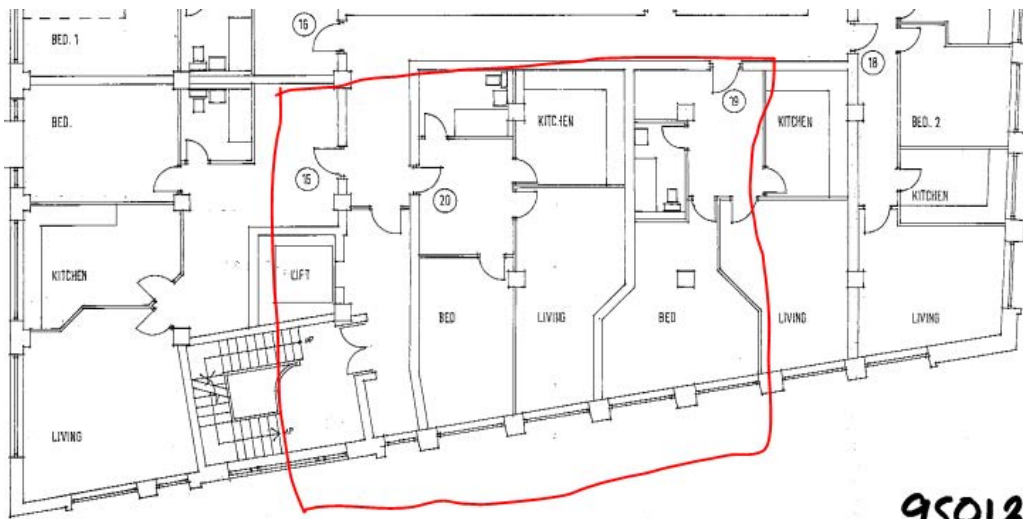


Figure 15: showing discussed windows

9.38 The indicative third floor plans also show below that the windows labelled W5/44, W5/43 and W5/42 serve a shared stairwell area which are not habitable rooms and therefore not required to meet the BRE criteria. The 12 windows left, whilst having reductions between 20%-30% mostly retain actual scores of 'mid-teens' and all are over 10 meaning that the impact is considered relatively minor in this location.



9501231

Figure 16: floor plan of Da Vinci House

- 9.39 Of the eight windows that receive a moderate or major reduction, five of these windows serve rooms that have at least one other window that meets the BRE numerical targets and would retain a VSC close to, or in excess of the BRE 27% target. The five windows serve three rooms which all meet NSL guidelines as well and therefore it is considered that their daylight is unlikely to be noticeably affected by the proposed building.
- 9.40 There are three windows on the fourth floor which have a moderate to major reduction and serve single aspect rooms facing north. These would experience losses between 32.6% and 37.9%. These are significant losses but the proposed actual scores are 12.30 to 14.39 which, on balance, still reflect acceptable scores for this central London location. These actually reflect similar scores in surrounding buildings including the Ziggurat Building.
- 9.41 Overall the proposal does result in some significant losses however there are fundamental mitigation factors which mean the overall impact is not adverse and the overall daylight/sunlight scores for neighbours are retained at an acceptable level.

External amenity spaces

- 9.42 An assessment was undertaken in relation to overshadowing of amenity spaces on the Ziggurat Building. It confirmed that the amenity spaces all meet BRE guidance for sun on ground analysis.

Outlook and enclosure

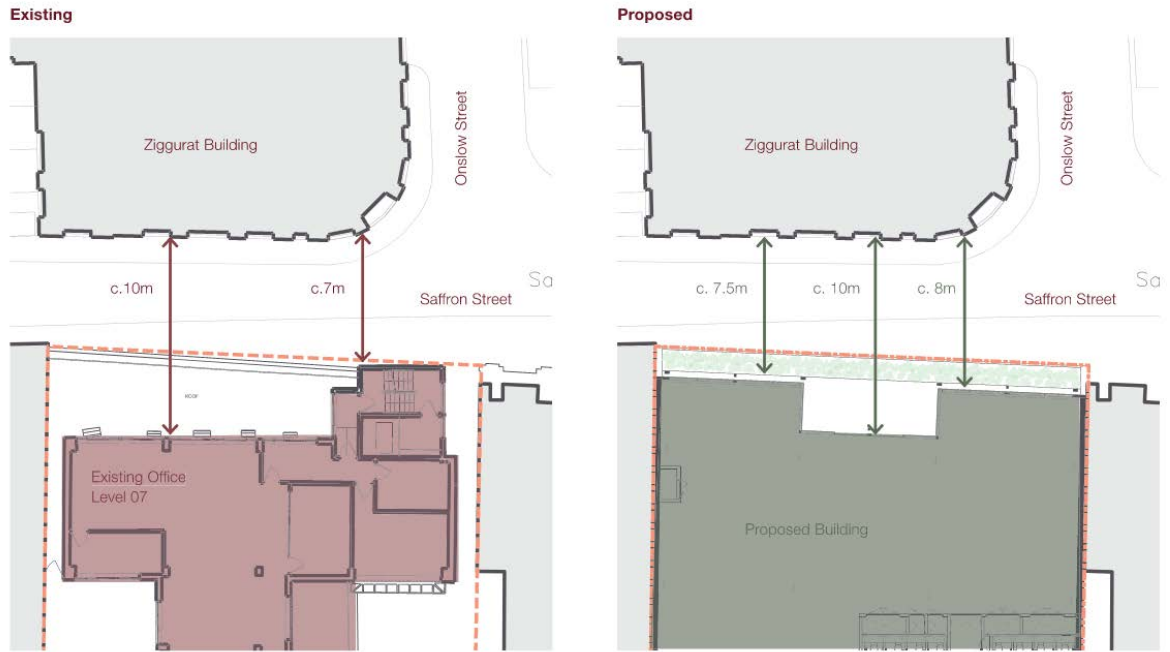
- 9.43 The impact to neighbours outlook and enclosure has been a considerable source of concern for neighbours highlighted in objections and comments received by the Council. As per the pre-application reports this was also highlighted by the Council and was a key issue that officer advised needed to be addressed as part of the scheme.
- 9.44 Looking at the comparison between the new building and existing car park, the changes that have the potential to impact residents are mainly located on the mid to upper levels.
- 9.45 For example, the relationship between the site and Da Vinci House to the south is only changing slightly as the building line at the lower floors is being retained but then extending in height to level 04. After this the floors are set back considerably and will have limited visibility anyway. It is recognised that this does result in an increase in height at the point closest to this neighbouring building however the increase is small, and this only matches the shoulder height of the Da Vinci building meaning that the level of outlook loss or increase in sense of enclosure would be small and not harmful. Overall from an outlook and enclosure perspective the impact on Da Vinci House is not considered harmful or adverse.

- 9.46 This principle is actually similar in relation to Ziggurat Building as well. Firstly, *figure 17* confirms that the building maintains the same building line on the lower levels until level 04



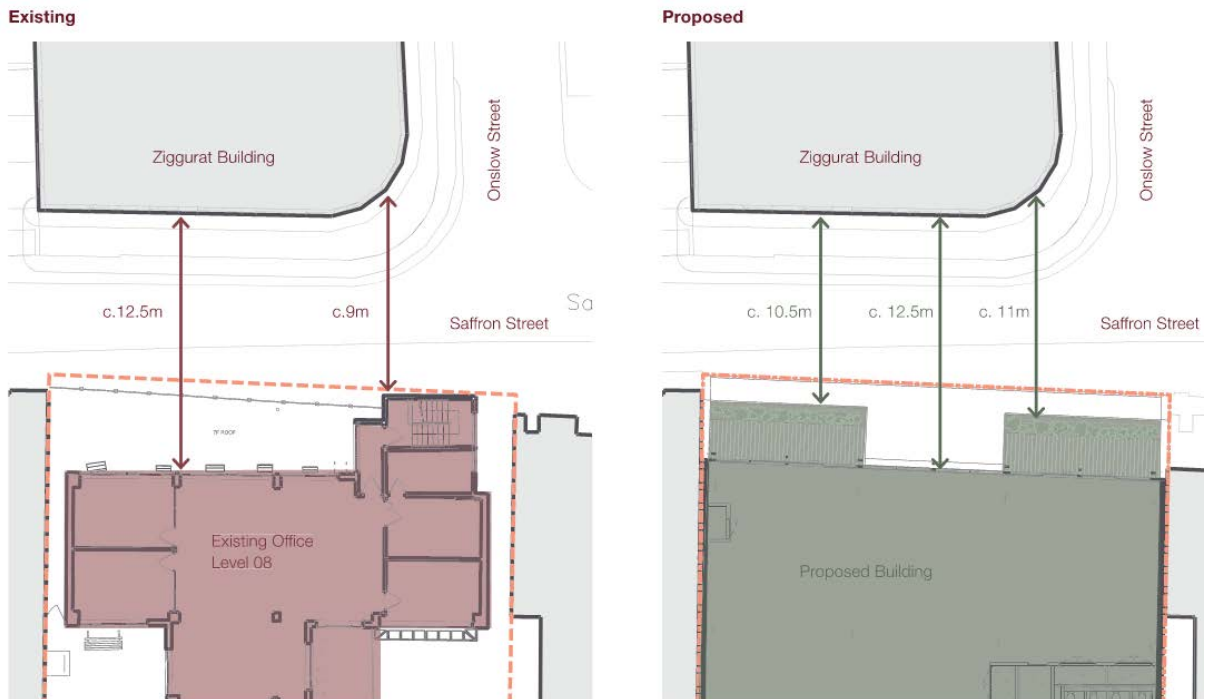
Figure 17: showing building distances

- 9.47 Here you can see that the impact on outlook and enclosure would be negligible considering the relationship between the two buildings is staying the same and therefore outlook and enclosure remain unaffected.
- 9.48 *Figure 18 and 19* below show level 04 and level 05 and you can see that whilst the proposed building does come forward at this level, overall the building line is still stepped in character; allowing for some relief and that the existing closest distance between the two buildings is actually higher than what it is being proposed. It is also important to mention that these distances are relatively small and not considered to mean that the relationship is drastically or adversely different; currently the building lines at these level ranges from 10m to 7m and 12.5m to 9m with the new building measuring as 7.5m to 10m and 12.5m to 10.5m respectively.



Diagrammatic Plans

Figure 18: Showing building distances



Diagrammatic Plans

Figure 19: showing building distances

9.49 Overall this confirms that the impact to the lower and mid-levels of the Ziggurat Building is not harmful and the change is relatively small.

9.50 With the upper floors (from level 06 and above) the proposed building starts to significantly step away with terraces, planting and landscaping replacing the building line. It is recognised that proposed building is significantly taller than the existing car park and offices however due to the setbacks proposed the upper floor flats still retain an acceptable level of outlook and enclosure. The setback distances start at 14m from level 06 and then increase to 23m to level 08. *Figure 20* demonstrates the existing and proposed relationship with these measurements.

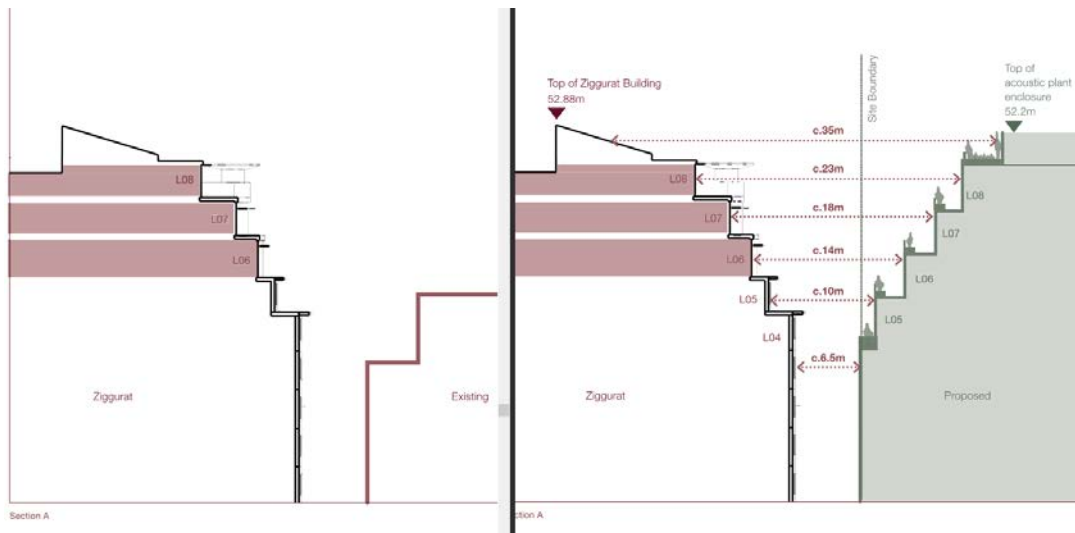


Figure 20: section showing building distances

9.51 Site visits were undertaken by officers to understand this relationship better and inform the assessment. Whilst there is an increase in height which will result in a small loss of outlook the open plan nature of the apartments on the Ziggurat building mean that the main habitable/living spaces still benefit from generous views and very little enclosure from different points of the room. The photos below shows the view facing the development site which will be affected (left) and the view from the same room out of the east facing windows (right) demonstrating this point.



Figure 19: photos from apartments of Ziggurat building



Figure 21: photos from apartments of Ziggurat building

- 9.52 It is also important to mention that this marries up with the existing relationship between 59 Saffron Hill and the Ziggurat Building, which at points will be closer than the proposed building but is akin to many building distances within the area.

Privacy and overlooking

- 9.53 The proposed development has three elevations, as mentioned, along Saffron Street, Saffron Hill and St Cross Street.
- 9.54 Along Saffron Hill, the site is directly opposite ‘Dunstan House’ which is a commercial building providing office space. Whilst the height of the proposed development is increasing compared to the existing building, the building line and distance between buildings is staying the same and there are also some existing small windows which benefit the existing office space on top of the car park that already face towards the office windows in Dunstan House.
- 9.55 The amenity impact on commercial uses is given less weight than residential or other sensitive uses. The proposed development would provide a small increase in overlooking and loss of privacy due to the change of use and use of balconies however the building distances are typical of the area and will not result in overlooking to any different degree than between other existing commercial buildings in the area. Due to these distances being retained and use of neighbouring buildings the impact is acceptable.

- 9.56 With St Cross Street, again the building line and distances between the site and the neighbouring buildings is staying the same. In this instance, 'Da Vinci House' is a residential building. At the furthest point the proposed building on ground floor is approximately 16.4m away and at the closest point this reduces to 13.2m. The Amenity CPG (2021) is clear that new buildings should have a separation distance of 18m however if there is an existing building line of less than this, then the existing relationship is considered to be the acceptable point of where a building can be. This is explained in paragraph 2.5 and 2.6 which is below:

2.5 Where there is an existing street or public space, this space is considered to already provide an adequate separation between properties and so the 18m guideline will not apply. However, care should be taken to reduce overlooking from the street into habitable rooms near to a street or public space, particularly bedrooms. Public spaces and communal areas will benefit from a degree of overlooking as this can increase natural surveillance of these spaces and therefore act to deter crime.

2.6 There may also be instances however, where the historic character of the immediate area is composed of buildings positioned less than 18m apart and it will be appropriate to reflect this in the design of development schemes.

- 9.57 Mitigation measures have been incorporated into the scheme which do help mitigate harmful levels of overlooking and loss of privacy. These include the setting back of the building envelope, the use of planting and the stepping back of the building on the upper levels. The building is wrapped with small balconies with large amounts of planting, which provides a buffer for residents and occupants of the building and significantly helps reduce visibility. Due to the sustainable-led design, the windows also have multiple panes which breaks up the glazing and helps reduce overlooking. Obviously the balconies can be used however they are small and not spaces to enable large groups to meet or work. Also once the building reaches the 6th floor it steps back quite significantly and the distances become much larger and out of character for the area. *Figure 22* below is a screenshot of the 6th floor terraces and with the distances measured:

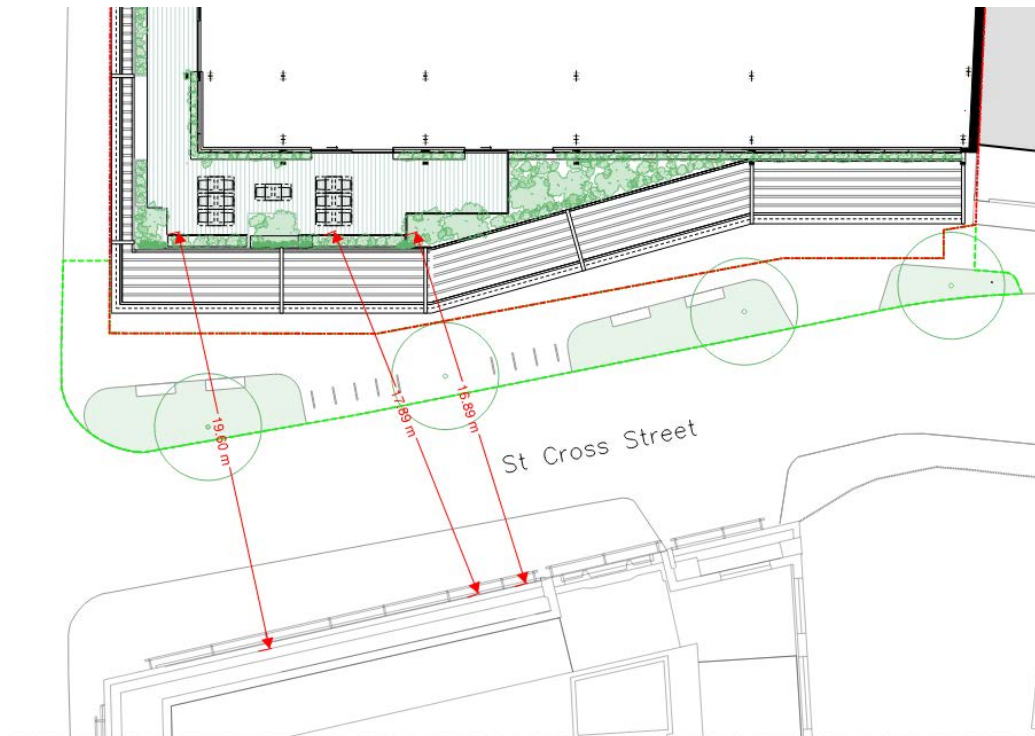


Figure 22: Building distances between the site and Da Vinci house

- 9.58 These distances increase on the 7th and 8th floor well above the minimum 18m outlined in the CPG document. Overall due to the use of the site changing to commercial office space, there will be an increase in overlooking and loss of privacy naturally, due to the increased level of activation and use. However considering the building line is staying the same, the different mitigation measures implemented and the building at upper floor is being stepped back significantly this impact is not adverse or harmful.
- 9.59 The Saffron Street elevation has the closest relationship between it and any facing building with the Ziggurat building being approximately 6.5m at the closest point away from the proposed development. As with the outlook and daylight/sunlight issue assessed above, this has been the subject of numerous objections by residents and officers have undertaken a site visit to understand the relationship between the two buildings. Officers recognise that there will be an increase in overlooking and small loss of privacy due to this close relationship however, it is considered that this can be successfully mitigated against to prevent any harmful impacts.
- 9.60 As with the St Cross Street elevation, the building line has been set back to ensure the distance between the internal office area and the neighbouring windows is maximised, the floors are also set slightly above the floors of the Ziggurat building so as to reduce the directness of views and there is also provision of extensive planting on the small external terrace areas. Following a full assessment by officers, the terraces at 5th and 6th floors

(which have the closest relationship to the Ziggurat building) have been altered to be fully planted and inaccessible for occupants of the proposed building. This now means the closest relationship, is the seventh floor terrace approximately 13.7m away from windows of the Ziggurat building and building to building is approximately 17.4m.

9.61 This successfully creates a buffer to ensure that the visibility of occupants and neighbours is reduced. Figures 23 and 24 below shows the section of this and CGI views from inside the proposed building itself which exemplifies this point:

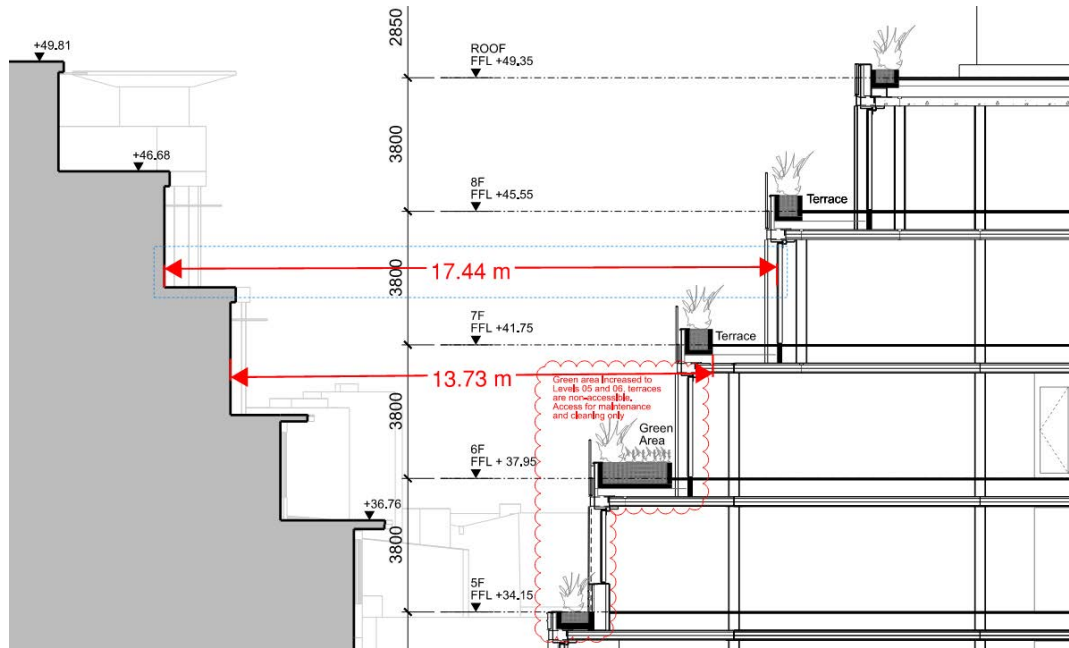


Figure 23: section between the development and Ziggurat building showing building distances

Existing



- Currently nothing obstructs the view from the NCP car park to the Ziggurat building

Proposed



- A landscaped 'buffer' offers improved privacy from existing condition.
- Tall planting is proposed to ensure it obstructs views.
- 1m deep planter zone ensures occupiers are kept at a distance from building's perimeter.
- The proposed levels are staggered from the Ziggurat ones to ensure overlooking is further mitigated.

Figure 24: CGI showing outlook from proposed development

- 9.62 This shows the mitigation measures in place and how this overcomes the issue. What is important is the success of the planting strategy to ensure this issue is resolved in the best possible way and therefore the Council will be placing a condition on the application to secure all planting but especially with respects to the impact it has on amenity.
- 9.63 What is also important to mention is that currently there is already office accommodation at similar distances to what is being proposed. The NCP offices are on top of the car park have existing windows facing the Ziggurat building and currently have no mitigation measures in place.
- 9.64 Overall the proposal will not result in a harmful increase in overlooking or loss of privacy and therefore is acceptable in this respect.

Noise and Vibration

- 9.65 A noise assessment has been submitted by the applicant in support of for the proposed development.
- 9.66 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, BS 4142:2014 "Methods for

rating and assessing industrial and commercial sound” and the Camden Council’s Local Plan, version June 2017.

- 9.67 The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 9.68 The assessment indicates that the proposed installation should be capable of achieving Camden’s environmental noise criteria at the nearest and potentially most affected noise sensitive receptors given the appropriate selection of plant and equipment.
- 9.69 Therefore the Council is satisfied that the submitted acoustic submission meets Camden’s local plan guidelines and therefore acceptable in environmental health terms. Conditions are recommended to be placed on any permission to secure details of the final plant when implemented on site, emergency plant noise, controlling the playing of amplified noise and vibration measures. Condition 40 also secures the hours of use of the roof terraces to only be from 8am – 8pm
- 9.70 Overall the proposal complies with policies A1 and A4 of the 2017 Local Plan and the guidance within the Amenity CPG.

10. SUSTAINABILITY AND ENERGY

- 10.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- 10.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Redevelopment strategy

- 10.3 Policy CC1 of CLP requires that proposals that involve substantial demolition demonstrate that it is not possible to retain and improve the existing building. The policy does not state that the demolition of existing buildings is unacceptable, but requires that in all cases consideration must be given to the refurbishment and reuse of the building before demolition is accepted. The London Plan states at Policy SI 7 that the redevelopment of sites should minimise the use of new materials and follow circular economy principles.

10.4 Taking into account the condition of the existing building and feasibility of re-use, it is necessary to use the following hierarchy to explore options for the existing site, with the aim of optimising resource efficiency. All options should achieve maximum possible reductions for carbon dioxide emissions and include adaptation measures, in accordance with the Council's Development Plan and CPG.

I. Refit

II. Refurbish

III. Substantial refurbishment and extension

IV. Reclaim and recycle.

10.5 From pre-application stage there has been a strong emphasis on ensuring that the potential reuse of the car park was fully explored. In line with policy CC1 and chapter 9 of the energy efficiency and adaption CPG, the assessment followed the development options and hierarchy above looking at how the building could be retrofitted, refurbished or extended before demolition. All of options have been assessed and are supported by a pre-demolition audit and pre-refurbishment audit.

10.6 Whilst the building does contain a small amount of office accommodation, it is mostly a car park which remains uninsulated, not air tight and provides spaces not suitable for commercial accommodation. This means this is not a functioning building that exists currently but a building which supports a wholly different use to the one proposed.

10.7 Following on from this, it has clearly been demonstrated that significant works would have to be done to the structure, façade, floor slab, existing cores, column grids, car ramps and floor levels meaning that the refit and refurbish option would not be appropriate in this instance.

10.8 In terms of the next development option; substantial refurbishment and extension, this takes into consideration the need to optimise site capacity and alter the existing structure to meet future needs. This may involve significant changes to the façade (façade replacement) but should seek to retain as much of the existing building as possible reducing the need to use new materials and reduce the loss of embodied carbon in the existing structure.

10.9 As the building is split into three sections the refurb and extension naturally proposed to take out the middle core and replace with an extension, aligning the floor levels and adding a couple of floors above. The diagram below from the document demonstrates this.

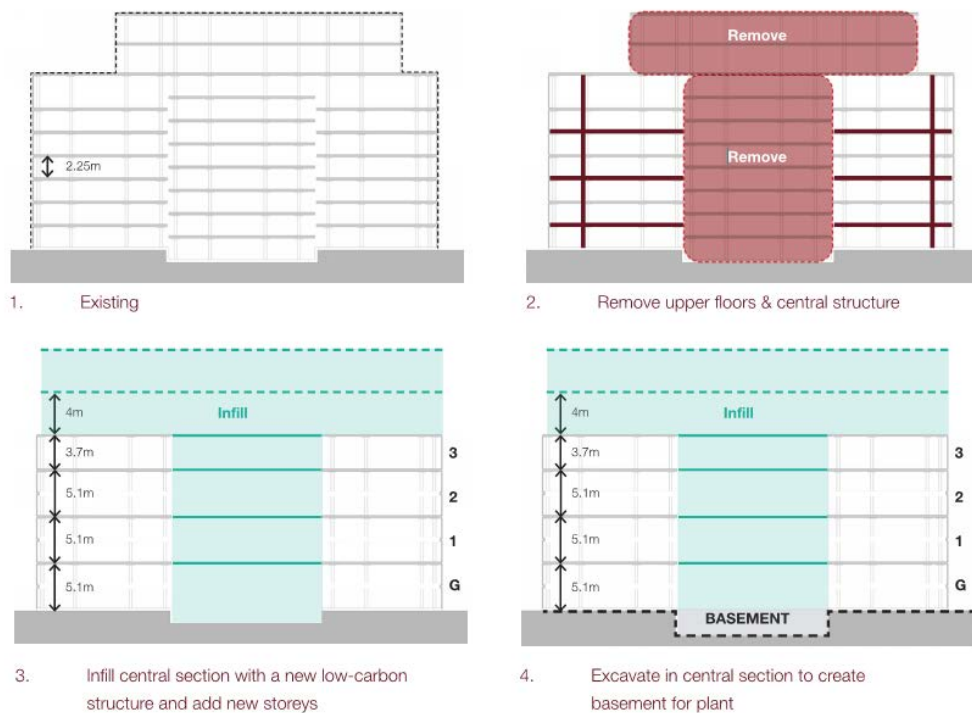


Figure 25: redevelopment strategy for retention

- 10.10 With this option columns would be taken out and replaced with beams to improve support and part of the ramps would be reused for servicing and core-type uses the middle section would be 'stitched' to the floors around it.
- 10.11 The issue with substantial refurbishment is that the small grid, awkward ceiling height due to the existing floor levels and extensive work around the façade and activation of the ground means that additions are difficult for the building. Furthermore the intervention would involve carbon intensive structural alterations that would remain compromised for future flexibility. On top of this, it is important to recognise that the building is used as a car park and not designed for commercial accommodation meaning that extensive work has to be undertaken in order to alter the building.
- 10.12 Overall this means that the council is satisfied the development options and hierarchy has been successfully followed and demonstrates that the principle of demolition of the building in this case is justified.
- 10.13 Along with this information the Circular Economy statement and pre-demolition audit have been provided. They confirm that the building services, façade materials, MEP services and overall performance is in relatively poor condition and cannot be retained as part of the proposal. The Circular Economy statement highlights that very little can be retained for the proposed development however one big benefit is the retention of approx. 60% of the piled foundations which will be secured as part of the proposal.

- 10.14 It is clear that circular economy principles have been followed reviewing the recycling of all timber, steel, ceiling, vinyl, glass, bricks, tarmac elements as well as car parking equipment. A number of different organisations that can either manage this or would be interested in these materials have been identified and demonstrates the level of recycling possible as part of the proposal.
- 10.15 To ensure this is captured within the development and greater resource efficiency through recycling and reuse of materials, a condition is attached securing a reuse strategy for existing materials and another condition requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use. A demolition management plan/method statement will also be secured via s106 agreement.

Whole Life Carbon

- 10.16 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life. Policy SI2 of the 2021 London Plan provides guidance on when Whole Life Carbon Assessments should be used and what information should be provided when the development involves substantial demolition. The LPG document for Whole Life-cycle Carbon assessment guidance also provides further information on benchmarks that developments are expected to hit in each module.
- 10.17 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).
- 10.18 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are "regulated emissions" and so are considered separately and in detail in relation to the zero-carbon target (see the "Energy and carbon reductions" section below).
- 10.19 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).
- 10.20 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again

at the end of its life (when it decomposes), so it is included in the total A-C-Modules.

- 10.21 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent (kgCO₂e/m² GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The table below show how the development performs against the benchmarks, as well as the aspirational targets.

Modules	Min benchmark for OFFICE (kgCO₂e/m² GIA)	Aspirational Benchmark for OFFICE (kgCO₂e/m² GIA)	Proposal (kgCO₂e/m² GIA)
A1-A5	<950	<600	538
B-C (excl B6 & B7)	<450	<370	505
Total A-C (ex B6&B7 inc sequestration)	<1400	<970	842

Table 5 - Summary of Whole-Life Carbon results for the office development

- 10.22 In his case, overall the development meets the total benchmark as shown in Table 5. For the building materials in Modules A1-A5 and for the Totals including sequestration it meets the aspirational benchmarks but for the Modules B and C (ex B6 &B7) it does not meet the benchmark. The proposed raised floor has the single biggest impact on the whole life carbon at this stage with lighting installations also having a large impact. It is stated that to have low operational emissions the building is quite heavily serviced with the replacement lifecycles having an impact. The applicant states that they are determined to work with manufacturers to improve this. A condition is secured to require this to be further considered to reduce the whole life carbon of the building during operation and end of life to within the benchmarks where feasible. Table 5 above confirms that the operational module (B-C) would have to be reduced by 55kgCO₂e/m² to meet the minimum benchmark and 135kgCO₂e/m² to meet the aspirational.

Energy and carbon reductions

- 10.23 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy S12 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be

clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

- 10.24 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

Energy and carbon summary

- 10.25 The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	17%
Be green stage (renewables): CLP policy CC1	20%	22%
Total carbon reduction: LP policy SI2 and LP CC1	35%	35%

Table 6 - Carbon saving targets (for majors) and the scheme results

- 10.26 The proposals also have an overall modelled Energy Use Intensity (EUI) of 54.22 kWh/m²/year which compares well to the GLA demand values for offices of 55 kWh/m²/year and a modelled Space Heating Demand (SHD) of just 2.29 kWh/m²/year which is significantly better than the 15 kWh/m²/year GLA demand value.

- 10.27 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement which includes monitoring, in compliance with the development plan.

Total carbon reductions

- 10.28 Reductions are measured against a baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). The remainder of the carbon savings to 100% reduction (zero carbon) should then be secured through a carbon off-set payment.

- 10.29 This is charged at £95/tonne CO₂/yr (over a 30-year period) which is 29.53 tonnes x £95 x 30 years = £83,611. This amount will be spent on delivery of carbon reduction measures in the borough.

- 10.30 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 35.3% below Part L requirements as shown in table 6 above. A **carbon offset of £84,161 will be secured by**

Section 106 legal agreement to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 10.31 London Plan policy SI 2 sets a policy target of at least a 15% reduction for non-residential development through reduced energy demand at the first stage of the energy hierarchy.
- 10.32 In this case, the development meets the policy target of 15% (non-resi), reducing emissions by 17% at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, targeting of a low air permeability of $3\text{m}^3 /(\text{h}.\text{m}^2)$ @ 50 pa, consideration of wall to window ratio, efficient glazing, and addresses the requirements of the cooling hierarchy and overheating including recessed windows/projections over windows, Brise Soleil shading to southern and western façade and consideration of G-value of the glazing to reduce solar gain which can reduce the demand of active cooling in the development. The proposal includes energy efficient measures like MVHR and LED lighting throughout.

Be clean stage (decentralised energy supply)

- 10.33 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- 10.34 In this case an assessment of the existing London heat map has been made and there is an existing network within a 500m range. However correspondence has been provided which states that due to the additional infrastructure which would be required and the difficulties crossing Farringdon Street that the costs would mean this is not currently viable. The proposals will enable connection to a Heat Network to be technically feasible and economically viable in the future.

Be green stage (renewables)

- 10.35 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 10.36 In this case, the development exceeds the policy target of 20%, reducing emissions by 22% at this stage through renewables, in compliance with the development plan. The proposal includes 42.35kWp PV array of 77 panels on the roof with full details secured by condition 24. The proposal includes

low carbon heating like Air Source Heat Pumps (ASHPs) and further details will be secured via condition.

Be seen (energy monitoring)

- 10.37 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. The proposal includes has proposed building management system / energy monitoring equipment.
- 10.38 The **Energy and Sustainability Strategy secured by Section 106 legal agreement** will secure reporting to the GLA in line with their published guidance.

Climate change adaption and sustainable design

- 10.39 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The BREEAM Pre Assessment indicates the proposals will achieve BREEAM Excellent with at least 91% of available credits in Energy, 66% for Water and 78% for materials which meets the requirements.
- 10.40 The proposals for the site include a minimum 98m² of high-quality green roof accommodating wildflower, sedum and others of significant ecological benefit. Also, a minimum of 266m² of green wall, 248m² of ground floor planters and 326m² of urban trees
- 10.41 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. The development incorporates sustainable drainage systems (SUDS) and water efficiency measures. Flood risk is covered in the 'Water, Flood risk and drainage' section of this report.
- 10.42 Overall the development meets Camden's Local Plan and policy guidance, ensuring that at least 60% of the available credits for energy and water are met and 40% of the credits in materials. The building achieves a BREEAM 'Excellent' score of 80.06% however there are potential uplifts to achieve 'Outstanding' which are possible. This will be caught within the energy and sustainability plan, secured via s106 agreement

11. OPEN SPACE, LANDSCAPING AND TREES AND BIODIVERSITY

Public open space

- 11.1 The Local Plan requires an appropriate contribution to open space, with priority given to publicly accessible open space. Policy A2 gives priority to securing new public open space on-site, with provision of space off-site near to the development except where on-site provision is not achievable. If there

is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.

- 11.2 CPG Public Open Space states that developments exceeding 1,000sqm in floorspace will be expected to contribute towards open space and play facilities, as will schemes of 11 or more additional dwellings.
- 11.3 The CPG describes public open space as 'open space that can be used and enjoyed by all the community. It is distinct from privately accessible open space such as private or communal gardens or balconies that do not ordinarily provide access for everyone'
- 11.4 Whilst the scheme involves demolition and full rebuild on site, the Council recognises there is existing office floorspace. Therefore the Council will calculate the increase of office floorspace in the scheme which would be 10,369sqm. Based on an employment density of 1 worker per 13sqm, there would be around 810.9 additional occupiers. This would equate to a requirement of 600sqm (0.74sqm open space requirement x 810.9 additional occupiers).
- 11.5 No new public open space is provided that meets the requirements set out in CPG Public Open Spaces because of the constraints of the site. Policy A2 acknowledges that achieving the full amount can be challenging, particularly on sites within densely built up parts of the borough such as this, where the majority of the site is already built over. There is also no existing public open space on site at present, and the building occupies almost the full footprint and this structure is being reused. It would not be feasible onsite and there are limited options for offsite provision in a reasonable distance. Therefore, a financial contribution is required towards the provision, maintenance and improvement of open space. A financial contribution of £120,000 would be secured by S106 legal agreement towards public open space which includes capital costs and maintenance costs for 10 years.

Landscaping and trees

- 11.6 Policy A3 aims to protect and enhance sites of nature conservation and biodiversity. This will be achieved through several criteria (a to i). The Council will assess developments against the ability to improve biodiversity and its impact upon and secure management plans where appropriate. This policy also includes the protection of trees and the Council will seek to resist the loss of trees and vegetation of significant amenity, historic, ecological or cultural value but also promote incorporating trees within any proposal.

Nature conservation and biodiversity

- 11.7 In terms of Biodiversity Net Gain (BNG), the supporting assessment has calculated that the proposed development is likely to lead to a net gain 0.28 biodiversity habitat units, provided that these habitats are created, managed

and maintained appropriately and in line with a detailed management plan, as required under the Environment Act 2021.

- 11.8 In relation to BNG, as the baseline value of the site is negligible, even though the assessment confirms a net gain of 0.28 units, the development is exempt under de minimis exemption. This was confirmed by the Council's Nature/Conservation officer.
- 11.9 The UGF score for the proposed development is 0.30. The London Plan sets out score requirements of 0.30 for predominantly commercial developments; the current development proposals therefore meet this target. A condition securing the UGF score in a post approval assessment shall also be secured.
- 11.10 In addition to the targets for BNG and the UGF, A Preliminary Roost Assessment and Phase II bat survey were submitted which concluded that there was only low bat activity and no emergences recorded, no further surveys were deemed necessary, it is considered that bats will not be impacted as a result of the proposed development. The Preliminary Roost Assessment outlines in the mitigation section that to minimise light spill that mitigation will be applied by only lighting specific areas such as entrance ways, using a minimal level of lighting and lowering the height of lights.
- 11.11 The site is not within a Site of Importance for Nature Conservation (SINC). The Council's Nature Conservation Officer has reviewed the development and does not raise objection subject to conditions relating to external lighting, green roofs and planting. The only habitat currently found on site is building and hardstanding, which has very little ecological importance. The proposed loss of this "habitat", therefore, presents no constraint.
- 11.12 The scheme provides much urban greening, planting and landscape improvements as detailed above as part of the scheme, especially on the upper levels of the proposed building. The scheme looks to include these ecological enhancements in order to cater for; climate change resilience, maintenance, ecological connectivity, micro climates but also aiding aspect and privacy.
- 11.13 Due to the different elevations the site benefits from, which also have different contexts and respective building heights in close proximity, the strategy has developed to provide different levels of nature conservation and biodiversity enhancements in different areas.
- 11.14 The planting strategy is recognised as good quality and recognises these differences. The use of different vegetation in relation to the micro climates is positive and would contribute to a high quality and sustainable development. This will be in line with the London Plan and the London Borough of Camden Local Plan.

11.15 Details of minimum of 7 bird boxes (including redstart and swift boxes), provisions for roosting bats, green roofs, invertebrate friendly green infrastructure will be secured via conditions

11.16 Overall the proposal complies with A2 and A3 of the 2017 Local Plan.

12. HEALTH IMPACT

12.1 Camden Local Plan policy C1 seeks to promote strong, vibrant, and healthy communities and requires major development proposals to include a Health Impact Assessment (HIA). The Council's Planning for Health and Wellbeing CPG requires major developments to provide a HIA in support of the application. Accordingly, an HIA has been submitted with the application and reviewed by Camden officers.

12.2 This should contain a series of evidence based-recommendations setting out how a scheme can be enhanced and any mitigation measures that may be required. The assessment methodology is based on the World Health Organisation (WHO) definition of health as well as using the London Health Urban Development Unit (HUDU) tool which assesses health impacts under 11 different determinants.

12.3 Considering all of the relevant assessment criteria within these 11 determinates, the scheme provides either a neutral or positive impact to the local impact area. There are no instances where this produces a negative impact. In particular all criteria's within the 'access to work and training', 'minimising use of resources', and 'climate change' determinants experience a positive health impact

12.4 In consultation with the Council's Environmental Health officer, the Health Impact Assessment confirms that the removal of a car park is likely to reduce car usage, and along with increasing public transport use as well as encouraging active travel through providing cycle storage and end-of-journey facilities. Consideration of the indoor environment including light and temperature, as well as the aesthetic design has also occurred.

12.5 The improvements to the public realm are likely to encourage active travel in the local area for all. Table 3.4 references the TfL "Healthy Streets" approach, and there are features such as shade and public seating which are healthy streets indicators.

12.6 Within the Construction Management Plan, it is also noted the developer has committed to appointing a contractor that will sign up to the Building Mental Health charter or a similar scheme while also ensuring that an appropriate number of trained Mental Health First Aiders are always available on-site. This is welcomed by the Council and is an important evidence-based way to mitigate those risks.

12.7 Overall, the health impact of the scheme will be positive with no negative impacts identified and with mitigation methods specified where the impact is deemed to be neutral.

13. BASEMENT CONSIDERATIONS

13.1 Camden Local Plan policy A5 (Basements) seek to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.

13.2 A new basement level is proposed as part of the development across part of the site, as shown on the image below.

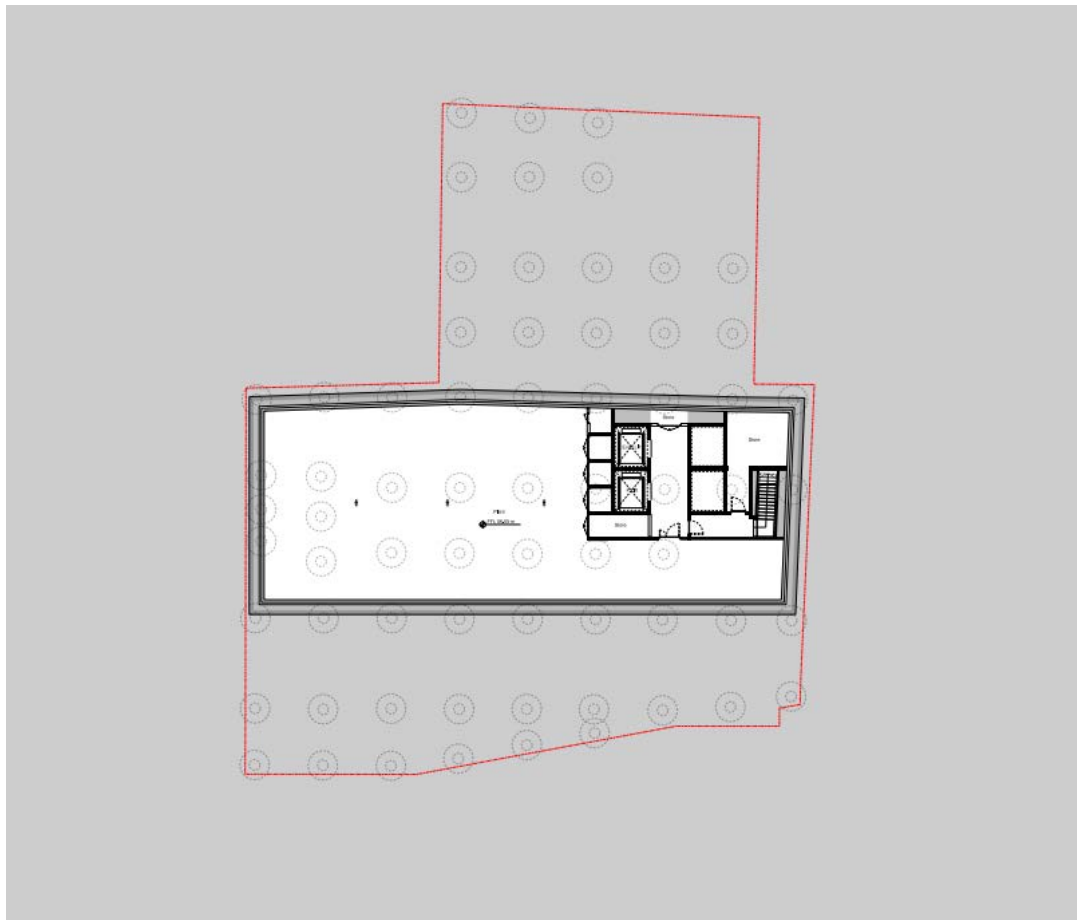


Figure 26: Proposed basement level

13.3 The application was accompanied by a Basement Impact Assessment authored by individuals with appropriate qualifications. An independent review was carried out by the Council's basement consultant (Campbell Reith) who reviewed the Basement Impact Assessment for potential impact on land stability and local ground and surface water conditions arising from basement development.

13.4 The BIA audit review concludes the following:

- The proposed scheme involves the demolition of the existing structure to allow construction of a new eight-storey building with a lower ground floor and basement and roof top plant. The basement will be founded on a new raft foundation with the existing piles being reused where possible.
- The presence of neighbouring foundations has been included in the assessment of subterranean flow. It is accepted that the development will not have a significant impact on the hydrogeology of the area.
- It is accepted that the proposed development will not adversely affect the hydrology of the local or wider environment.
- The BIA has assumed a bottom-up basement construction sequence; however, this should be confirmed as part of a Basement Construction Plan (BCP) along with confirmation of the pile lengths and the results of the footing investigation.
- A Ground Movement Assessment and a building damage assessment have been undertaken. The results of the assessments indicate that neighbouring structures will experience a maximum of Burland Category 1 damage (Very Slight) however, assumptions made in the assessment will be confirmed within a BCP.
- A monitoring strategy is recommended and will be secured as part of the BCP

11.5 Campbell Reith concludes that the BIA is adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements It recommends securing a Basement Construction Plan (BCP) which should be informed by additional ground investigation work. The proposed basement is considered acceptable, subject to a Section 106 obligation requiring a Basement Construction Plan (BCP) which is secured in light of the scale of the scheme and proximity to nearby buildings. The appointment of a suitably qualified engineer to oversee the works will be secured by condition 6.

13.6 Overall the proposal complies with policy A5 (Basement) of the 2017 Local Plan.

14. AIR QUALITY

14.1 Camden Local Plan policy CC4 is relevant with regards to air quality. Owing to the scale of development, the introduction of commercial uses and the potential to have an adverse impact on local air quality, a detailed Air Quality Assessment (AQA) has been submitted as part of this application which has been assessed by the Council's Air Quality Officer.

- 14.2 The proposed development is located adjacent to the busy Farringdon Road and a section of the London Overground railway line used by diesel trains. It will introduce new commercial uses into an area of potentially poor air quality. The proposal incorporates Mechanical Ventilation to improve Air Quality for the future occupants. A condition will require details of air inlet locations to be submitted for approval.

Operational impact of development on local area

- 14.3 The assessment confirmed that the building will be heated via ASHPs (non-combustion), and will be car free so no NOx emissions is expected.
- 14.4 In terms of backup power, the scheme includes secondary supplies provided to supply life safety systems and serve lift safety loads in accordance with BS 8519:2010.
- 14.5 The secondary supply will be provided via a life safety packaged emergency diesel generator including diesel storage located on the roof (refer to AHMM Proposed Roof Plant, Level 09 drawing) for backup to the following systems via diverse routes to meet the requirements of BS8539-1 2020:
- Mechanical smoke ventilation system and associated fans
 - Firefighting and Evacuation lifts
 - Sprinkler supply
 - Firefighting Equipment and Panels
- 14.6 This has been assessed by the Council's Air Quality Officer and is considered acceptable. With the Air Handling Units these fitted with filtration class ePM1 50% (F7) on the outdoor air intake to reduce the impact of pollutants to building occupants and meets BREEAM requirements for Air Quality. In addition, the intake and extract positions on the units will be located to avoid recirculation. Final details of mechanical ventilation and filtration will be secured via condition.
- 14.7 The proposals are car-free, uses electrified heating and as such achieves Air Quality Neutral.

Construction impact of development on local area

- 14.8 The area is highly sensitive to dust soiling. It is noted that all construction phases will create a medium risk of impact.
- 14.9 Air quality during demolition and construction would be managed with the CMP, which is secured by Section 106. Real time air quality monitoring is required by condition. Any Non-Road Mobile Machinery (NRMM) used on site for the construction will need to comply with the latest engine requirements via condition. Overall, the scheme meets the air quality requirements of the development plan.

15. WATER, FLOOD RISK AND DRAINAGE

- 15.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 15.2 In this case, the development incorporates brown/biodiverse roofs and sustainable drainage including permeable paving, attenuation tank, below ground raft foundation.
- 15.3 The site is located within Flood Zone 1. The application site is located in a low fluvial flood risk area, however there is risk of groundwater and surface water flooding.
- 15.4 A Flood Risk Assessment and a Below Ground Drainage Strategy have been submitted as part of this application. The submitted documents include pro-forma, drainage calculations, exceedance flow routes and maintenance tasks ownership. SUDS are proposed in order to manage the water environment on and around the site.
- 15.5 The proposed attenuation features include biodiverse/brown roofs and attenuation tank. In total, these will provide 145.4m³ attenuation capacity, helping to slow rainfall reaching sewers. Conditions are attached to secure full details of the SuDS and their proposed storage capacities. The information will be required to demonstrate that the system has been designed to accommodate all storms up to and including a 1:100 year storm with 40% provision for climate change as well as demonstrating a run off rate of 4l/s. A further condition requires evidence of installation.
- 15.6 The Lead Local Flood Authority is happy with the proposals subject to conditions on SUDS and living roof. Given the above, the proposed measures are considered acceptable in terms of flood risk.

16. TRANSPORT

- 16.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 16.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road
- 16.3 Camden's Transport Strategy (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods

to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal.

- 16.4 London Plan Policy T1 (Strategic approach to transport) states that Development Plans should support, and development proposals should facilitate, the delivery of the Mayor's strategic target of 90% per cent of all trips in inner London to be made by foot, cycle, or public transport by 2041.
- 16.5 London Plan Policy T1 also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 16.6 There is a dedicated parking bay for dockless rental e-bikes and rental e-scooters directly adjacent to the site on Saffron Hill. However, this bay is already showing signs of overcapacity and increasing demand. Camden Transport has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, however it only includes shared transport modes. It is our aspiration for the STAL score to be 6b in the area. The Council has plans to expand the network of bays in the area and the additional bays will be provided via developer contributions.

Trip Generation

- 16.7 The TRICS database was used to derive the anticipated total person trip rates generated by both the existing and proposed office space. The existing car park was not assessed, considering a lack of appropriate similar sites within the TRICS database. The TA states 'trips to this use largely comprise car/vehicles, which will not exist in future'. However, these motor vehicle trips are likely to continue, and we have concerns about the impact of displacement onto the wider area (for example, onto the surrounding highways network via paid for parking bays or in permit bays outside of the hours of CPZ restrictions). The Class E café/restaurant element of the proposals was also not assessed, with the reason given that this space is anticipated to primarily attract local employees and residents and will not result in a material number of public transport or private vehicles trips. Whilst this analogy may be accepted to a certain extent, a particular or unique restaurant may attract new visits which are specific to its business.
- 16.8 The expected net increase of total person trips arising from the proposed development is presented in figure 27 of the TA and reproduced here:

Table 5.7: Net Change (Proposed minus Existing)						
Travel Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Underground	+88	+8	+96	+8	+94	+102
Rail	+102	+9	+111	+9	+109	+118
Bus	+30	+3	+33	+3	+33	+35
Taxi	+1	0	+1	0	+1	+1
Motorcycle	0	0	0	0	0	0
Car Driver	-1	0	-1	0	-1	-2
Car Passenger	0	0	0	0	0	0
Cycle	+17	+1	+18	+2	+18	+20
Walk	+16	+1	+17	+1	+17	+18
Total	+252	+22	+273	+23	+269	+292

**Minor numerical discrepancies are due to rounding of numbers*

Figure 27: showing proposed trip generation

- 16.9 The proposal will result in a significant increase in person trips, especially during peak hours. The anticipated high volume of the walking trips is likely to be made from Farringdon and Chancery Lane stations, the bus stops on Farringdon Road, Clerkenwell Road, and Holborn Circus. Considering the increase in active travel trips to and from the site, including cycling, the Council will seek to secure financial contributions towards the aforementioned commitments of the CTS delivery plan.
- 16.10 The applicant was requested to provide data for the person trip increases for the whole day. This is outlined in the table below:

Table 2: Net Change in Daily Person Trips for Proposed Development			
Travel Mode	Daily (07:00-19:00)		
	In	Out	Total
Underground	+497	+477	+975
Rail	+575	+552	+1,128
Bus	+172	+166	+338
Taxi	+4	+3	+7
Motorcycle	-2	-2	-3
Car Driver	-8	-7	-15
Car Passenger	-1	-1	-2
Cycle	+95	+91	+187
Walk	+89	+86	+175
Total	+1,423	+1,366	+2,789

Figure 28: table showing person trip increases

- 16.11 An Active Travel Zone (ATZ) assessment included in the TA focuses on four routes to key destinations. The analysis demonstrates there are opportunities to widen the pavements and improve the public realm on St Cross Street adjacent to the development. Further detail on public realm improvements is contained later in the report.

Travel Planning

- 16.12 A framework travel plan aimed at staff and visitors was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The targets for active travel are acceptable.
- 16.13 A more detailed Workplace Travel Plan and associated monitoring and measures contribution of £11,348 will be secured by legal agreement if planning permission is granted.

Access and Permeability

- 16.14 The proposed development provides level pedestrian and cyclist access to entrances on the north, south and west boundaries of the site. St Cross Street provides the primary access to the office reception, the independent ground floor office space, and the café unit. Saffron Hill provides access to the café unit, UKPN sub-station, the café (back of house), and the primary access to the affordable workspace reception. Saffron Street provides access to the independent ground floor office space, a dedicated access to the cycle store, and a separate access for deliveries.
- 16.15 Vehicle access will be removed, with the site being car-free, and servicing taking place on Saffron Street.
- 16.16 The development includes the proposed delivery of public realm improvements to the pedestrian environment on St Cross Street and Saffron Hill. As mentioned above this is welcomed by transport officers with a high quality designed landscaping scheme. The widening of pavements and introduction of external seating, significantly improves the access and permeability of the area and will be secured through a public realm contribution and s278 agreement as part of it falls within Council land.

Cycle parking

- 16.17 205 long-stay cycle parking spaces are proposed for the office use at lower ground floor, accessible via a cycle lift and a cycle stair with a cycle ramp from Saffron Street to the north. These will comprise of 174 two-tier cycle rack spaces (85%), 10 accessible Sheffield stand spaces (5%), 21 Folding bicycle lockers (10%).
- 16.18 With regards to the lift access, paragraph 8.16 of the CPG Transport states: 'The route to cycle parking from street level must be step free. If level access

is unachievable, the cycle parking must be accessible via a ramp or a lift that is adequate in size to accommodate a cycle and its user. Lifts should measure a minimum of 2m x 2m, although where many users are likely to arrive at a similar time, for example at a large office development, lifts will not be an acceptable option, as convenient access would be compromised’.

- 16.19 The proposed office cycle parking proposals meet the guidance as laid out in CPG Transport and LCDS. Currently, the proposal includes a provision of 5% accessible Sheffield stands, 10% folding bicycle lockers and 85% two-tier stands. The proposal will also deliver 18 short-stay cycle parking spaces in the form of 9 Sheffield stands and will be located on St Cross Street, within the public realm improvements. This matches with guidance as outlined in the CPG and is therefore acceptable.

Car parking and vehicle access

- 16.20 The site is located in controlled parking zone CA-D (Kings Cross Area), which operates relatively limited hours for a central London location, from 08:30-18:30 Monday to Friday, and 08:30-13:30 on Saturday.
- 16.21 The development is proposed car-free, which would be secured by legal agreement if planning consent were granted. The existing multi storey car park which can accommodate 356 motor vehicles will be removed. The existing vehicle access point on St Cross Street will be removed and the footway reinstated. This will enhance the pedestrian environment.
- 16.22 Regarding disabled parking, London Plan Policy T6.5 ‘Non-residential disabled persons parking,’ section A states: *‘...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.’* Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: *‘All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.’*
- 16.23 Paragraph 5.19 of the Camden Planning Guidance on Transport states: *‘For all major developments the Council will expect that disabled car parking is accommodated on-site.’* Paragraph 5.20 further informs: *‘...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site’.*
- 16.24 The applicant is willing to provide the appropriate financial contribution towards the delivery of an on-street blue-badge parking bay. A potential location is proposed adjacent to the Saffron Hill site frontage. This would result in a loss of one pay by phone parking space. A disabled parking space provided on the public highway will form part of the public realm improvements.

- 16.25 The significant reduction in on-site car parking provision could lead to visitors arriving at the site and being unable to find somewhere to park. Officers expect the large majority of staff and visitors to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional EVCP (fast charger on an island buildout) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured by legal agreement in accordance with Local Plan Policy A1.
- 16.26 Objective 2 of the CTS sets out to reduce car ownership and use, and motor traffic levels in Camden, and features several measures in support of achieving this objective. One of the measures is 2d, which states that the Council will *'undertake a study to provide a robust evidence base using all relevant data and local context to identify where amendments to Controlled Parking Zone (CPZ) hours of control or size will have an impact on car ownership and car use, and use that study to help guide future reviews and decisions.'*
- 16.27 In alignment with that action, Camden's Controlled Parking Zones (CPZ) Review final report, which was published in February 2023, independently appraised all of Camden CPZs using a multi-criteria assessment. The findings show that there is a greater need to manage parking demand in the borough through the hours of CPZ controls. The CPZ Assessment Results show that CA-D CPZ performed relatively poorly in terms of the impact of its current hours of control in helping manage demand, and was attributed a "Red" RAG status, which present the greatest need and/or justification for increasing the regulation parking. The review recommends, amongst others, that the CA-D hours of operation are extended subject to consultation and decision-making processes.
- 16.28 In 2023 we reviewed our progress so far on the CTS and also set out our delivery plan for the period covering 2024/25. This was presented to [Culture and Environment Scrutiny Committee on 6th February 2024](#). We committed to deliver a package of
- 16.29 Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough:
- Controlled Parking Zone (CPZ) hours extensions
 - Workplace Parking Levy
 - EVCP roll out.

16.30 At present, the CA-D CPZ control hours do not extend into the evening, nor do they cover much of the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the scale and the location of the proposed development, it is appropriate to secure a contribution of £30,000 towards the CA-D CPZ review, which is likely to take place in 2025/26. This will be done via s106 agreement

Construction management

16.31 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction/Demolition Management Plan using the Council's CMP pro-forma is provided in support of the planning application. However, in absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.

16.32 The site is located within the Hatton Garden Conservation Area, in close proximity to Gray's Inn Road (A5200), High Holborn (A40) and Clerkenwell Road, which form part of the SRN. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). 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. More detailed Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents will therefore be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

16.33 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed with Camden Council.

16.34 The contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.

- 16.35 The development will require significant input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.
- 16.36 Implementation support contributions of £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.
- 16.37 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement.

Deliveries and Servicing

- 16.38 A draft Delivery and Servicing Plan (DSP) was submitted with the application.
- 16.39 28 servicing vehicle trips per day are predicted to be generated by the proposed development, using mainly 4.6t and 7.5t vans. Deliveries are expected to take place on Saffron Street to the north of the site. As part of the public realm improvements, the applicant is requested to refer to the pre-application request to 'close off the western section of Saffron Street to motor vehicles between Onslow Street and Saffron Hill (would be pedestrians and cycles only) and provide a shared space surface in high quality material (e.g., granite setts)', which would require the vehicles to enter Saffron Street from Farringdon Road and perform a three point turn to access the loading area in a form of double yellow lines.
- 16.40 A detailed DSP would be secured by legal agreement which would help to ensure that any operational impacts associated with delivery and servicing movements will be mitigated.

Public realm improvements

- 16.41 The public realm in the vicinity of the site is not particularly attractive, with the existing pedestrian environment on St Cross Street, and Saffron Hill, being of especially poor quality. The proposed development will make improvements to St Cross Street and the wider area:
- remove and relocate the existing motorcycle parking bay and car park access/egress.
 - increase the footway width to a min of 2m at its narrowest point.
 - install additional short-stay cycle parking in a form of nine Sheffield stands.
 - provide new planting with four integrated benches for public seating, including spaces for wheelchair users.

- improve lighting to deliver light levels which support the safety initiatives in the area, and navigation by people with visual disabilities.
- one accessible car parking space on Saffron Hill.
- a raised table at the junction of St Cross Street and Saffron Hill in high quality material (e.g., granite setts).
- closure of the [western section of Saffron Street](#) to motor vehicles between Onslow Street and Saffron Hill (would be pedestrians and cycles only) and provide a shared space surface in high quality material (e.g., granite setts).

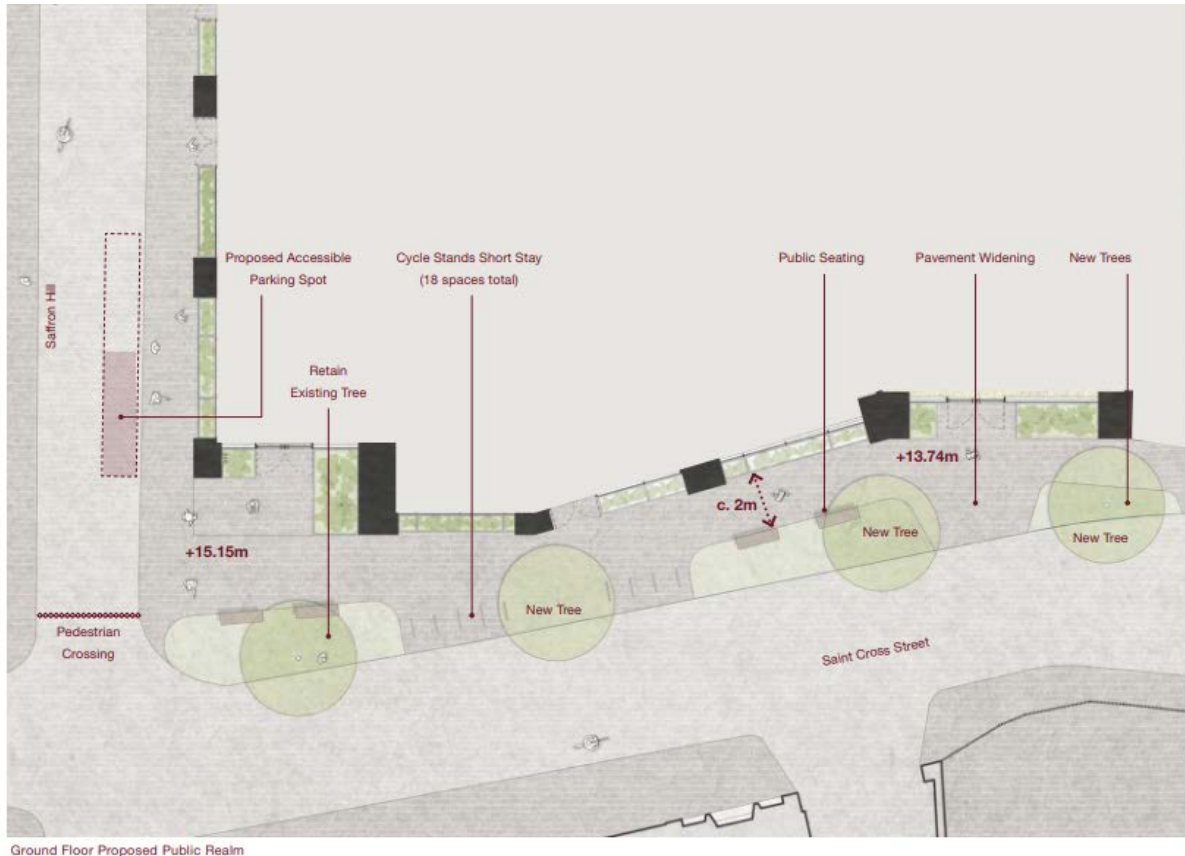


Figure 29: Plan showing public realm improvements

16.42 The applicant would be financially responsible for any works relating to changes or repairs to the highway. This includes the removal of a vehicle crossover on St Cross Street. The Council will therefore seek to secure a £250,000 towards necessary highways works and public realm improvements adjacent to the site by legal agreement.

Pedestrian, cycling and environmental improvements

16.43 Considering the anticipated increase in cycle and walking trips generated by the proposed development, and further promoted by the Travel Plan, and the displacement of the vehicles previously using the NCP car park, onto the surrounding streets, the Council will seek to secure a “Pedestrian,

Cycling and Environmental Improvements” financial contribution of £350,000 requested towards:

- junction improvements, Healthy Streets measures, and the introduction of segregated cycle lanes on Clerkenwell Road, which have been consulted on and are expected to be delivered in 25/26,
- the closure of Leather Lane to all motor traffic at all times and other accompanying works to improve and enhance air quality and safety in the area (operating to the same timeframes as above),
- an emerging Safe and Healthy Streets programme of transport and public realm interventions in the Hatton Gardens area, considered as part of the [Holborn Vision](#), and the emerging CTS three-year delivery programme 2025/26 - 2027/28
- Introducing timed motor traffic restrictions and other Safe & Healthy Streets measures on Baldwin’s Gardens, including to improve road safety in the vicinity of St Alban’s C of E Primary & Nursery School.

16.44 This contribution would be secured by legal agreement if planning permission were granted.

Micromobility improvements

16.45 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. The STAL analysis shows grades at 6a throughout the area which indicates opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 6b. Officers anticipate significant demand for more shared mobility parking bay capacity to be provided in the area should planning permission be granted. A micromobility improvements contribution of £10,000 would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

16.46 Overall the proposal complies with Camden’s Transport policies, securing high quality public realm works, providing car free development and ensuring the development’s impacts and construction are managed correctly.

17. EMPLOYMENT AND TRAINING OPPORTUNITIES

17.1 The proposed development would generate increased employment opportunities during construction and operational phases. To ensure local

people benefit from these opportunities in line with CLP policy E1, the following obligations have been negotiated and will be secured by Section 106 agreement.

During construction

- 17.2 Apprenticeships - as the build cost for this scheme will exceed £3 million the applicant will recruit **1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG**. Recruitment of construction apprentices should be conducted through the Council's [Euston Skills Centre](#) (formally Kings Cross Skills Centre). With a build cost of £50.2 million this would equate to 16 apprentices and a combined support fee of £27,200
- 17.3 Construction Work Experience Placements - The applicant will provide a set number of work experience placements (this is one placement per 500sq m of employment floor space) of more than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG. With the increase of office floorspace being 10,369sqm Floor space, this would be **20 work experience placements** and be secured via s106 agreement
- 17.4 Local Recruitment - the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.
- 17.5 Local Procurement - the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area.

Post construction – End User

- 17.6 There are a number of end-use employment opportunities associated with the scheme given the employment uses proposed. Based on the scale of the scheme and the number of total job opportunities, **3 apprenticeships** are sought on a 5-year rolling basis.
- 17.7 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:
- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers
 - Working with the council to deliver work experience placements through the hotel.

- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives
- 17.8 The developer is also encouraged to work with Camden Learning/STEAM on school engagement and with their commercial occupiers to offer work experience placements.
- 17.9 A post-construction employment and training plan, secured by s106, would cover ongoing engagement including partnership with Camden Learning, STEAM.
- 17.10 Section 73 of the Employment sites and business and premises CPG provides for a Section 106 contribution to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. This approach is supported through policy E2 of the Local Plan and applies to major commercial developments which will result in a net increase of 1,000sqm (GIA) or more of employment space. There is an uplift of 10,369sqm of office floor space. The contribution would total **£251,685.00** and be secured via s106 agreement.
- 17.11 As stated previously, due to the existing office floorspace on site the uplift for office floorspace is 10,369sqm. The AWS offered in the basement is 586sqm which works out at just over 5.5%. The developer will be required to offer the space to the jewellery sector, secured at 50% market rent for the lifetime of the development.
- 17.12 The above measures would be included in an enhanced package of Employment and Training measures secured by s106 agreement in accordance with CLP policy E1 and the CPG. The provision of a significant number of new jobs in Camden to be created by the commercial office building with café element is welcomed. The range of employment and inclusive economy contributions to be delivered as part of implementation of the scheme, would be fully in accordance with Camden's policies regarding an inclusive economy. Overall, the proposal would deliver a commercial use within an existing commercial-led centre, thereby contributing to the continued success of area, in addition to increasing footfall to increase visitor spending, and creating further job opportunities for Camden residents.

18. SAFETY AND SECURITY

- 18.1 Camden Local Plan policy C5 and CPG Design are relevant with regards to secure by design. Policy C5 requires developments to demonstrate that

they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime.

- 18.2 Currently the site is a car park with no activation on the ground floor. The proposed scheme would open the site up and significantly improve natural surveillance.
- 18.3 The Designing Out Crime officer was consulted by the Council at pre-application stage and following submission. Overall the officer raises no objection to the proposal, subject to conditions, but does raise a number of useful observations and recommendations for the applicant to take account of going forward. These include advice on site management, landscaping and security rated design to mitigate anti-social behaviour and theft. They requests a condition that requires details of how the scheme will achieve secured by design accreditation at a silver level to be approved in consultation with the Designing Out Crime Officer. This is secured via condition.

19. REFUSE AND RECYCLING

- 19.1 Policy CC5 and CPG Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 19.2 The proposal includes separate bin stores for each use, with storage for affordable workspace and the commercial space. On collection days, the refuse will be moved from the stores by on-site maintenance team to a temporary area at ground floor level for collection. The bin stores are a sufficient size to accommodate the bin capacity required, with further details secured by condition.

20. CONTAMINATED LAND

- 20.1 The desk study identified a number of potential sources of contamination on site including made ground associated with former on site development and former industrial land uses on site (including a meat trades institute, lamp warehouse, electricity substation and ruins. Offsite sources identified include a former warehouses of varying uses and a thermometer factory.
- 20.2 In consultation with the Council's Environmental Health officer, the desk study was considered satisfactory, and recommended an intrusive investigation to confirm the risks posed by the site.
- 20.3 Given the potential for contamination on site a contamination land condition is recommended below, with a generic quantitative risk assessment for the site investigation to be completed. Overall the scheme is in accordance with

in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017

21. FIRE SAFETY

- 21.1 Policy D12 (Fire safety) of the London Plan requires all major development proposals to be submitted with a Fire Statement. London Plan Policy D5 (Inclusive Design) also requires schemes to incorporate safe and dignified emergency evacuation and suitable fire safe strategies. The application has been supported by a Fire Statement which includes details of the fire strategy.
- 21.2 Upon consultation with the Council's Building Control officer, the submitted fire statement complies with Policies D12 and D5 in relation to fire safety and accessibility. CLT floor slabs are proposed, which are of a non-standard building type and this will require assessment by the Building Control Authority.

22. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 22.1 New floorspace is proposed at this stage so will be CIL liable. The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. This includes bringing vacant buildings back into use. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule.

23. CONCLUSION

- 23.1 The proposed scheme has demonstrated the building cannot be retained and therefore the principle of demolition has been established. The removal of the building is supported in heritage terms replacing a negative contributing building within a Conservation area and replacing it with high quality designed building which preserves the character of the Conservation area. The building is a high quality designed scheme with commercial floorspace and affordable jewellery workspace to strengthen Hatton Garden as the centre for jewellery. The scheme provides a highly sustainable building and significantly improves the surrounding area and public realm. The scheme also provides multiple job and employment opportunities for residents of Camden.

Public benefits

- 23.2 No harm has been identified to heritage assets but if the committee decides there is harm, there are a number of public benefits that could weigh against that harm.
- Affordable jewellery workspace
 - Increased commercial floorspace

- Significant public realm improvements
- Ground floor activation with separate retail unit
- High quality designed building
- Highly sustainable building
- Contributions towards sustainable travel projects
- Employment and training opportunities and contributions

24. LEGAL COMMENTS

- 24.1 Members are referred to the note from the Legal Division at the start of the Agenda.

25. RECOMMENDATION

25.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- 586sqm of affordable jewellery workspace discounted at 50% market value for the lifetime of the development
- Commercial space plan – detailing the affordable workspace provision
- Basement Construction Plan
- Public open space contribution of £120,000
- Travel Plan and associated monitoring and measures contribution of £11,348.
- Car-free development.
- CA-D CPZ review contribution of £30,000.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- Construction management plan (CMP), and if necessary, a separate Demolition Management Plan (DMP), CMP implementation support contribution of £30,513, and CMP Impact Bond of £32,000.
- Requirement to form a construction working group consisting of representatives from the local community.
- Delivery and Servicing Plan.
- Highway and Public Realm Improvements contribution of £250,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £500,000.
- £20,000 Disabled Parking bay contribution
- Micromobility improvements contribution of £10,000.
- Energy and Sustainability plan including the requirement to future proof to connect to the heat network and commitment to meet BREEAM 'Excellent' and investigate meeting 'Outstanding'
- Carbon offset payment £84,161
- Employment training plan providing, 16 construction experience apprentices and 20 construction work experience placements, local recruitment, local procurement and 3 end use apprentices on a five year rolling basis plus a £27,200 apprentice support contribution and additional contribution of £251,685 for economic development initiatives
- Local Recruitment - Work with King's Cross Construction Skills Centre to recruitment in line with Camden's local recruitment target of 20% advertising with Council for no less than a week before the roles are advertised more widely.
- Local Procurement - Sign up to the Camden Local Procurement Code which sets a target of 10% of the total value of the construction contract.
- Local Employment Commitments (Network) – Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers.

- Local Employment Commitments (Work Experience) – Working with the Council to deliver work experience placements through the hotel.
- Local Employment Commitments (Recruitment) - Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market possibly through supported employment initiatives.
- Architect retention clause

26. CONDITIONS

1	<p>Three years from the date of this permission This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>22068-AHMM-ZZ-ZZ-DR-A-PL001, 22068-AHMM-ZZ-ZZ-DR-A-PL011, 22068-AHMM-ZZ-GF-DR-A-PL100 Rev 01, 22068-AHMM-ZZ-01-DR-A-PL101, 22068-AHMM-ZZ-05-DR-A-PL105 Rev 02, 22068-AHMM-ZZ-06-DR-A-PL106 Rev 02, 22068-AHMM-ZZ-07-DR-A-PL107, 22068-AHMM-ZZ-08-DR-A-PL108, 22068-AHMM-ZZ-09-DR-A-PL109, 22068-AHMM-ZZ-LGF-DR-A-PL10L, 22068-AHMM-ZZ-B1-DR-A-PL10B, 22068-AHMM-ZZ-XX-DR-A-PL201, 22068-AHMM-ZZ-XX-DR-A-PL202, 22068-AHMM-ZZ-XX-DR-A-PL203, 22068-AHMM-ZZ-XX-DR-A-PL301, 22068-AHMM-ZZ-XX-DR-A-PL302 Rev 02.</p> <p>22068-AHMM-ZZ-GF-DR-A-PL210, 22068-AHMM-ZZ-01-DR-A-PL211, 22068-AHMM-ZZ-01-DR-A-PL212, 22068-AHMM-ZZ-01-DR-A-PL213, 22068-AHMM-ZZ-01-DR-A-PL214, 22068-AHMM-ZZ-05-DR-A-PL215, 22068-AHMM-ZZ-06-DR-A-PL216, 22068-AHMM-ZZ-07-DR-A-PL217, 22068-AHMM-ZZ-08-DR-A-PL218, 22068-AHMM-ZZ-09-DR-A-PL219, 22068-AHMM-ZZ-B1-DR-A-PL21B, 22068-AHMM-ZZ-XX-DR-A-PL221, 22068-AHMM-ZZ-XX-DR-A-PL222, 22068-AHMM-ZZ-XX-DR-A-PL223, 22068-AHMM-ZZ-XX-DR-A-PL231, 22068-AHMM-ZZ-XX-DR-A-PL232.</p> <p>Acoustic Impact Report 023620-R03-B; Air Quality Impact Assessment 14810-01 v2.00; Archaeological Desk Based Assessment November 2023; Basement Impact Assessment 38823-A2SI-XX-XX-RP-Y-0004-03 June 2024; Biodiversity Gain Plan and Urban Greening Factor Review 147523; Circular Economy Statement Rev E July 2024; Construction Management Plan dated 15th February 2024; Daylight, Sunlight and Overshadowing Report P3173; Draft Delivery, Servicing & Waste Management Plan March 2024; Design and Access Statement March 2024; Energy Strategy Rev E July 2024; Fire Statement 231219DN00F1; Flood Risk Assessment and Drainage Strategy Report 2929; Framework Travel Plan March 2023; Regeneration Statement March 2024; Security Needs Assessment SGW-JN-001600; Sustainability Statement December 2023; Transport Statement March 2024; Whole Life Carbon Assessment Rev H2 October 2024, GLA Reporting Spreadsheet (Rev B), WLCA Assessment spreadsheet (Rev H2)</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Materials Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p>

	<p>a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills, external doors and gates;</p> <p>b) Plan, elevation and section drawings, including fascia, cornice, pilasters and glazing panels of the new shopfronts at a scale of 1:10;</p> <p>c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p>Meter box, flues and pipes</p> <p>No meter boxes, flues or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017..</p>
5	<p>Basement</p> <p>The development hereby approved shall not commence other than demolition, site clearance and preparation, until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.</p> <p>Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.</p>

<p>6</p>	<p>Basement</p> <p>The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment Basement Impact Assessment 38823-A2SI-XX-XX-RP-Y-0004-03 June 2024, Ground Movement Assessment 38823-A2SI-XX-XX-RP-Y-0005-02 hereby approved, and the confirmation at the detailed design stage that the damage impact assessment would be limited to Burland Category 1.</p> <p>Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.</p>
<p>7</p>	<p>Mechanical Ventilation</p> <p>Prior to occupation full details of the mechanical ventilation system including the following shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> a) air inlet locations (air inlet locations should be located away from busy roads and any other emission sources and as close to roof level as possible, to protect internal air quality). b) appropriate NO₂ and Particulate filtration system on the mechanical ventilation intake has been installed and a detailed mechanism to secure maintenance of this system. <p>The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>

<p>8</p>	<p>Air quality monitors No development shall take place until</p> <p>a. prior to the commencement of demolition, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</p> <p>b. a confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details.</p> <p>c. prior to commencement of development, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed date of commencement of demolition shall be submitted to the Local Planning Authority and approved in writing.</p> <p>The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be agreed in writing by the Local Planning Authority.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
<p>9</p>	<p>NRMM No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).</p> <p>Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy GG3 and SI 1 of the London Plan</p>
<p>10</p>	<p>Emergency generator Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of the proposed Emergency Diesel/Oil Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The flue/exhaust from the generator should be located away from air inlet locations. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be</p>

	<p>provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.</p> <p>Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
11	<p>Design out crime accreditation</p> <p>Prior to commencement of the above ground works (other than demolition, site clearance and preparation), proof that the plans can achieve secured by design silver accreditation award must be submitted to the local planning authority and approved in writing.</p> <p>Reason: to ensure the development is safe and secure comply with policy C5 of the 2017 Local Plan</p>
12	<p>SUDS</p> <p>The sustainable drainage system as approved (Flood Risk Assessment and Drainage Strategy Report Rev 03, dated July 2024) shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water and to achieve a maximum of 2.0 l/s. The system shall include a 145.4m attenuation tank and brown/biodiverse roof, as stated in the approved drawings and shall thereafter retained and maintained in accordance with the approved maintenance plan. A CCTV survey to confirm the existing drainage arrangement, outfalls and pipe condition must be undertaken prior to construction. A maintenance owner should be named, and a Flood Risk Emergency Plan produced as part of the details.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies</p>
13	<p>SUDS</p> <p>Prior to occupation, evidence that the system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan</p>
14	<p>Biodiverse roofs</p> <p>Prior to commencement of above-ground works (other than demolition, site clearance and preparation), full details of all biodiverse, substrate-based extensive living roofs to be incorporated into the development shall be submitted to and approved in writing by the local planning authority. The design and planting scheme should be informed by the Ecological Appraisal and should reflect the local conditions and species of interest. The details shall include the following:</p>

	<p>A. detailed maintenance plan, B. details of its construction and the materials used, C. a section at a scale of 1:20 showing substrate depth averaging 130mm with added peaks and troughs to provide variations between 80mm and 150mm and D. full planting details including species showing planting of at least 16 plugs per m2. E. details of how planting mitigates amenity impacts</p> <p>The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied. Guidance on living roofs is available in the Camden Biodiversity Action Plan: Advice Note on Living Roofs and Walls.</p> <p>The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment as well as safeguarding the amenities of neighbours in accordance with policies A1, G1, CC1, CC2, CC3, CC4 D1, D2 and A3 of the London Borough of Camden Local Plan 2017.</p>
<p>15</p>	<p>Noise levels Prior to first occupation, full, details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/ equipment will be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS 4142:2014 "Methods for rating and assessing industrial and commercial sound at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. The plant needs to be installed in accordance with the details thus approved and maintained to ensure it continues to meet the specified noise levels.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
<p>16</p>	<p>Anti-vibration Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
<p>17</p>	<p>Noise levels from emergency plant Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10 dB one metre outside any premises.</p>

	<p>The emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an emergency loss of power.</p> <p>Testing of emergency plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
18	<p>Fire Statement</p> <p>The development shall be constructed in accordance with, and at all times occupied and managed in strict compliance with, the approved Fire Statement (doc ref: 231219DN00f1 dated 08/03/2024).</p> <p>Reason: To ensure the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan 2021.</p>
19	<p>UGF</p> <p>The development shall achieve an Urban Greening Factor Score of at least 0.30 prior to first occupation and shall thereafter be maintained and retained to achieve this score in perpetuity in accordance with approved document: Biodiversity Gain Plan and Urban Greening Factor Review 147523</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity, character and biodiversity of the area in accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017 and policy G5 of the London Plan 2021</p>
20	<p>PV panels</p> <p>Prior to commencement of relevant works, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells (at least 41,000kwh/annum) or energy generation capacity (at least 42.35kWp) and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.</p>
21	<p>Bird and bat boxes</p> <p>Prior to first occupation of the development a plan showing details of at least 7 bird and bat boxes (including redstart and swift boxes), their locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the</p>

	<p>local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (2016) and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.</p>
22	<p>Lighting strategy</p> <p>Prior to first occupation, a detailed lighting strategy for the development shall be submitted to and approved in writing by the local planning authority.</p> <p>The lighting shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In the interest of ecology, visual amenity and promoting a safe and secure environment in accordance with policies A1, A2, and A3 of the 2017 Camden local Plan.</p>
23	<p>Air Source Heat Pumps</p> <p>Prior to commencement of relevant works, details, drawings and data sheets showing the location SCOP of 3.4 or more and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The active cooling should not be activated unless the internal temperature exceeds 22 degrees Celsius. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies.</p>
24	<p>Archaeology</p> <p>No demolition or development shall commence until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archeological interest are identified by stage 1 then for those parts of the site which have archeological interest a stage 2 WSI shall be submitted to and approved by the Local Planning Authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI, which shall include:</p> <p>A) The statement of significance and research objections, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p>

	<p>B) Where appropriate, details of a programme for delivering related positive public benefits</p> <p>C) The programme for post-investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in stage 2 WSI.</p> <p>Reason: Development must not commence before this condition is discharged to safeguard the heritage of the borough by ensuring that any archaeological remains on site are not permanently destroyed, in accordance with policy D2 of the Camden Local Plan 2017 and Policy 7.8 of the London Plan 2021.</p>
25	<p>Cycle Storage</p> <p>Prior to commencement of above ground works (other than demolition, site clearance and preparation), full details of the long-stay including accessible and cargo bike provision, shall be submitted to and approved in writing by the local planning authority.</p> <p>The approved cycle parking facilities shall thereafter be provided in their entirety prior to the occupation of the relevant part of the development and shall thereafter be retained.</p> <p>Reason: To ensure the scheme makes adequate provision for cycle users in accordance with policies T1 and T2 of the London Borough of Camden Local Plan 2017.</p>
26	<p>Planters</p> <p>Prior to relevant works full details of planters for all roof terraces shall be submitted to and approved in writing by the local planning authority. The planters shall be installed prior to first occupation and shall be permanently retained thereafter.</p> <p>Reason: In order to prevent unreasonable overlooking of neighbouring premises and to ensure the development fulfils proposed biodiversity obligations in accordance with the requirements of policies CC1, CC2, A3, D1, D2 and A1 of the London Borough of Camden Local Plan 2017.</p>
27	<p>Hard and soft landscaping</p> <p>Prior to relevant works, full details of hard and soft landscaping and planting strategy for the whole building shall be submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
28	<p>Hard and soft landscaping</p> <p>All hard and soft landscaping works shall be carried out in accordance with the approved landscape details prior to the occupation for the permitted use of the development or any phase of the development, whichever is the sooner. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon</p>

	<p>as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.</p> <p>Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
<p>29</p>	<p>Waste storage</p> <p>Prior to the commencement of the use hereby permitted, details of waste and recycling storage for the development shall be submitted to and approved in writing by the local planning authority. The waste and recycling storage shall be provided in accordance with the approved details prior to the commencement of the use hereby permitted, and shall thereafter be retained solely for its designated use.</p> <p>Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management and collection of waste, and to safeguard the visual amenity of the area in accordance with policies A1, A4, D1, CC5 of the Camden Local Plan 2017.</p>
<p>30</p>	<p>Demolition waste</p> <p>The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.</p>
<p>31</p>	<p>Reuse strategy</p> <p>Within 12 months of the above ground works commencing, a Reuse and Restoration strategy should be submitted to the local planning authority and approved in writing.</p> <p>The strategy should include details of:</p> <ul style="list-style-type: none"> a) how the building, materials and plant equipment will be disassembled and reused b) timings for disassembly and the site restoration/build out. <p>The disassembly and site restoration must be undertaken in accordance with the approved details.</p> <p>Reason: In order to ensure that the materials are reused in accordance with circular economy principles and to ensure that the land is cleared and left in a reasonable state to retain the visual amenity of the area in accordance with policies D1, D2 and CC2 of the London Borough of Camden and Policy S17 of Intend to publish London Plan (2019)</p>

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Thames water

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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Contaminated land

Part A

No development shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority.

The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Part B

No development shall commence until a remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person

Part C

Following the completion of any remediation, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted to, and approved in writing, by the local planning authority. This report shall include (but may not be limited to): details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person

	<p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017</p>
34	<p>Whole Life-Cycle Carbon Assessment (with targets) Prior to the occupation of the development:</p> <p>a) Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to ZeroCarbonPlanning@london.gov.uk and SustainabilityPlanning@camden.gov.uk, along with any supporting evidence as per the guidance.</p> <p>b) Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the development.</p> <p>c) The Whole Life Carbon should not exceed 842 kg CO₂e/M² GIA overall for Modules A-C (excluding B6 & B7 including sequestered carbon), and should at least meet the GLA WLC benchmarks for each of the modules as defined in the GLA Whole Life Carbon Assessment guidance.</p> <p>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Camden Local Plan policies CC1, CC2, CC3, and CC4, and London Plan policies, SI1, SI2, SI3, SI4, SI5 and SI7.</p>
35	<p>Roof terraces The roof terraces use hereby permitted shall not be carried out outside the following times 08.00 to 20.00 Mondays to Fridays. No music shall be played on the terrace in such a way as to be audible within any nearby residential premises.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of Policies G1, CC1, D1, A1, and A4 of the London Borough of Camden Local Plan 2017.</p>
36	<p>Full fibre connectivity Prior to occupation of each block, detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development, shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure full connectivity in line with policy SI6 of the London Plan 2021</p>
37	<p>Flat roofed areas The flat roofed areas of the proposed building approved under 2024/1364/P shall not be used as a roof terrace, sitting out area or other amenity space and only be accessed for maintenance purposes.</p> <p>Reason: To protect the amenity of adjoining occupiers and the area in accordance with policies A1 and D1 and D2 of the Camden Local Plan 2017</p>

38	<p>Privacy screening</p> <p>Prior to occupation, full details of privacy measures between the existing Ziggurat Building, Da Vinci House and proposed building, should be submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: to ensure the development provides a reasonable standard of visual privacy between existing Ziggurat Building, Da Vinci House and proposed building in accordance with the requirements of policy A1 of the 2017 Local Plan of the London Borough of Camden</p>
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27. INFORMATIVES

1	<p>Conditions marked with **</p> <p>The matters covered by conditions marked with an ** are matters which would usually be incorporated into a Section 106 Agreement. On Council own schemes because the Council cannot enter into an agreement with itself the usual practice would for the permission to reference the Section 106 requirements for information.</p> <p>If the Council retains ownership of the application site although the reference to Section 106 requirements would not be legally binding they would act as a record of the requirements the Council as planning authority expects the Council as landowner to comply with. If the Council disposes of a relevant interest in the Application Site (which for the avoidance of doubt will not include disposals to individual tenants and occupiers) the incoming owner will be required to enter into a Section 106 giving effect to those requirements which will then become a legally binding document.</p>
	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
2	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
3	<p>Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.</p>

<p>4</p>	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
<p>5</p>	<p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
<p>6</p>	<p>Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for archaeological projects in Greater London. This condition is exempt from deemed discharged under schedule 6 of the Town and Country Planning (Development Management Procedure) (England) 2015</p>
<p>7</p>	<p>Biodiversity Net Gain (BNG) Informative (1/2): The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless: (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).</p>
<p>8</p>	<p>Biodiversity Net Gain (BNG) Informative (2/2): <u>+ Irreplaceable habitat:</u></p>

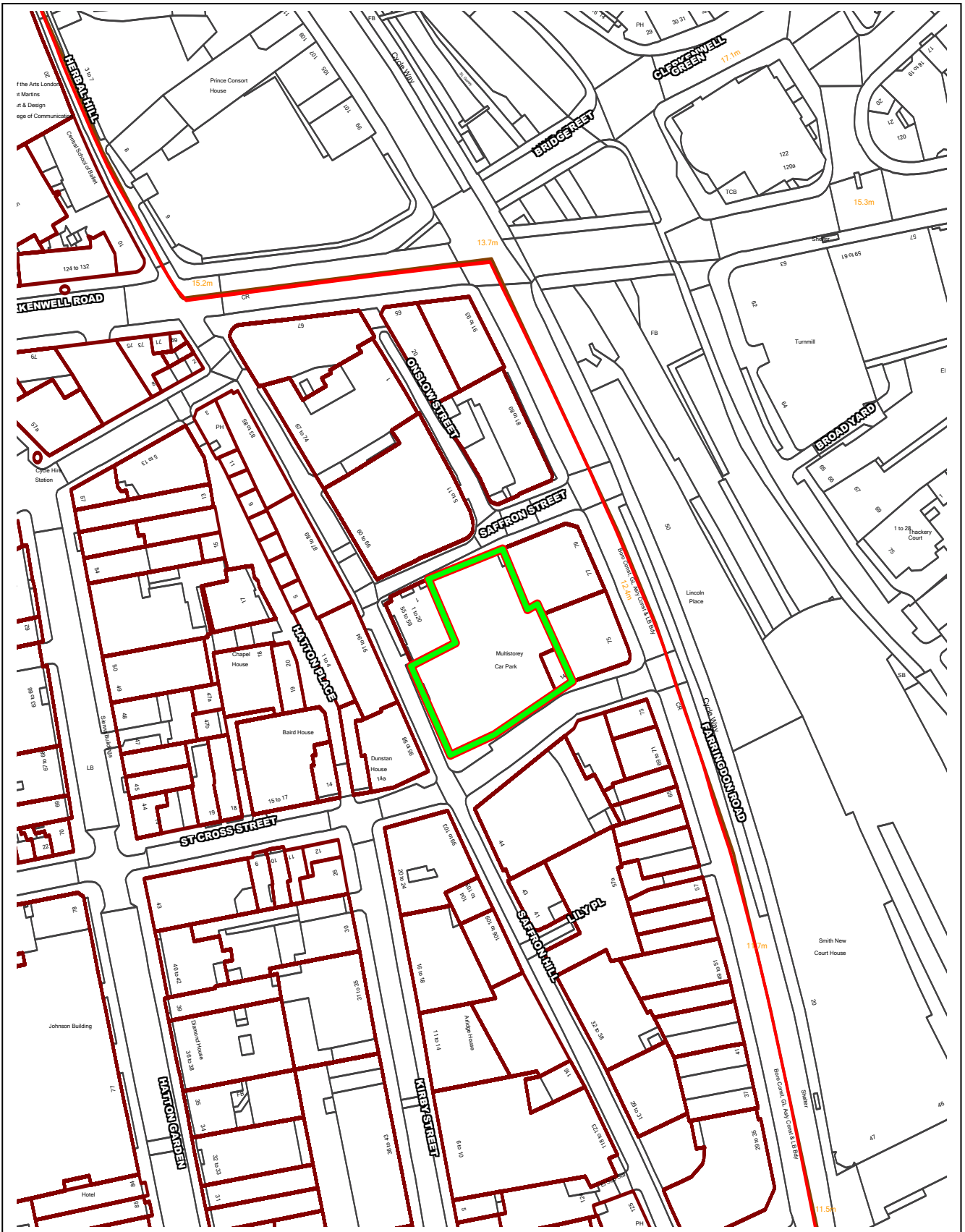
If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.


++ *The effect of section 73(2D) of the Town and Country Planning Act 1990*

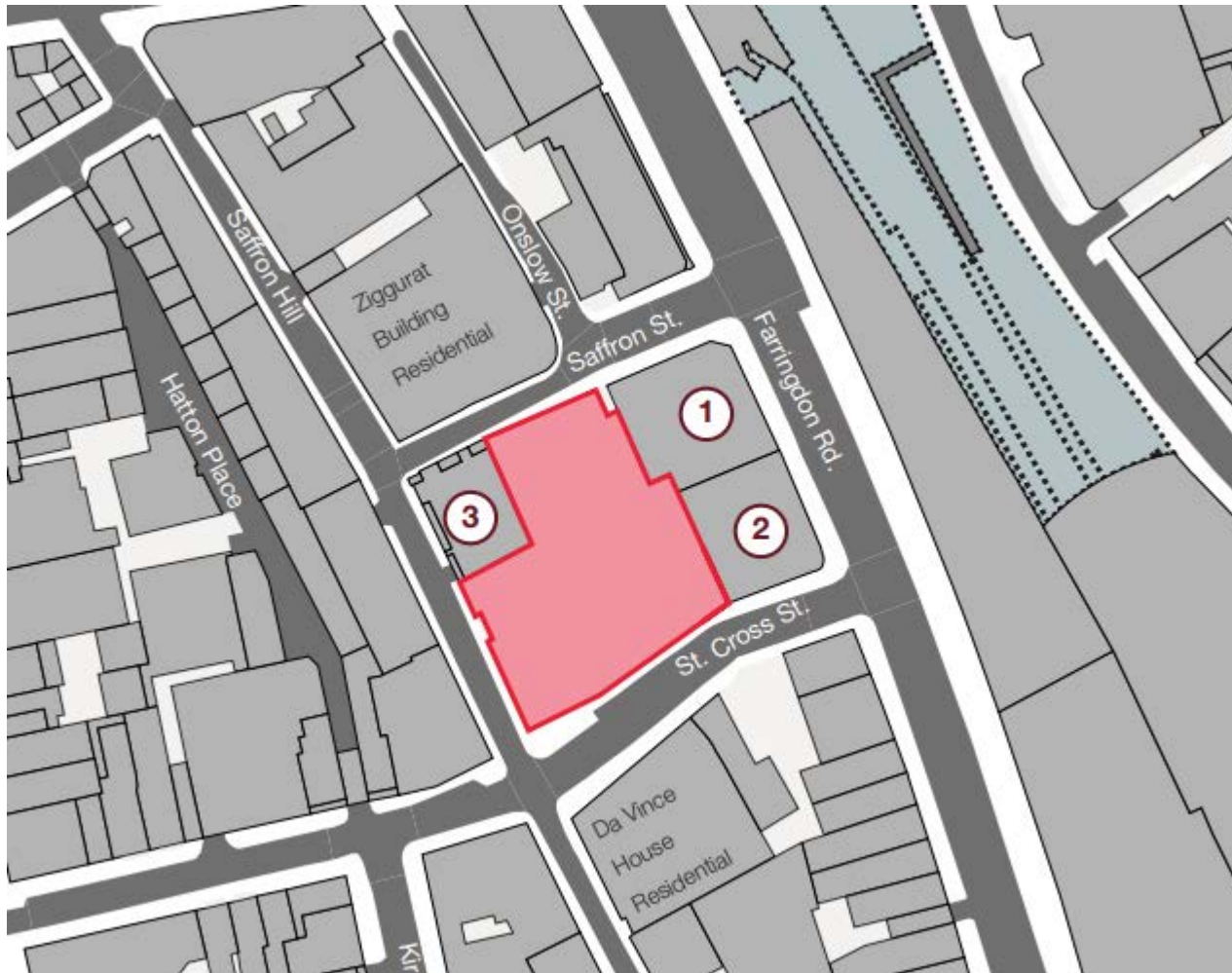
If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission (“the earlier BGP”), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.

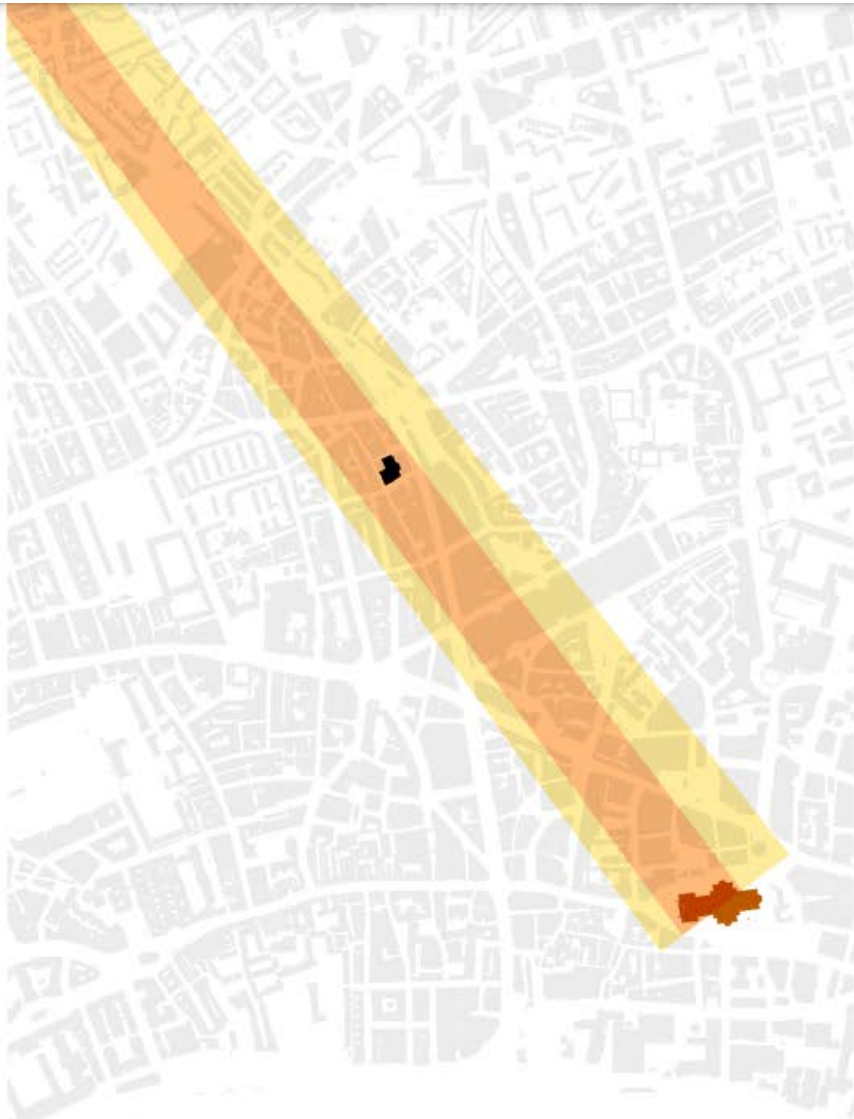
++ *Phased development*

In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.



	<p>Application No: 2024/1364/P</p> <p>NCP Saffron Hill</p> <p>45 To 54 And 3 Saffron Street</p> <p>London</p> <p>EC1N 8UN</p>	<p>Scale: 1:1527</p> <p>Date: 4-Nov-24</p>	<p>N</p> 
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LVMF Landmark Viewing Corridor from Kenwood House Gazebo (3A.1)
Local Views and London View Management Framework



LVMF Wider Setting Consultation Area from Parliament Hill (2A.1)
Local Views and London View Management Framework



Saffron Street,
North Elevation



St. Cross Street,
Looking East



Car Park Entrance on St Cross Street,
South Elevation



View 03. St. Cross Street looking North East



View 05. Saffron Hill looking West



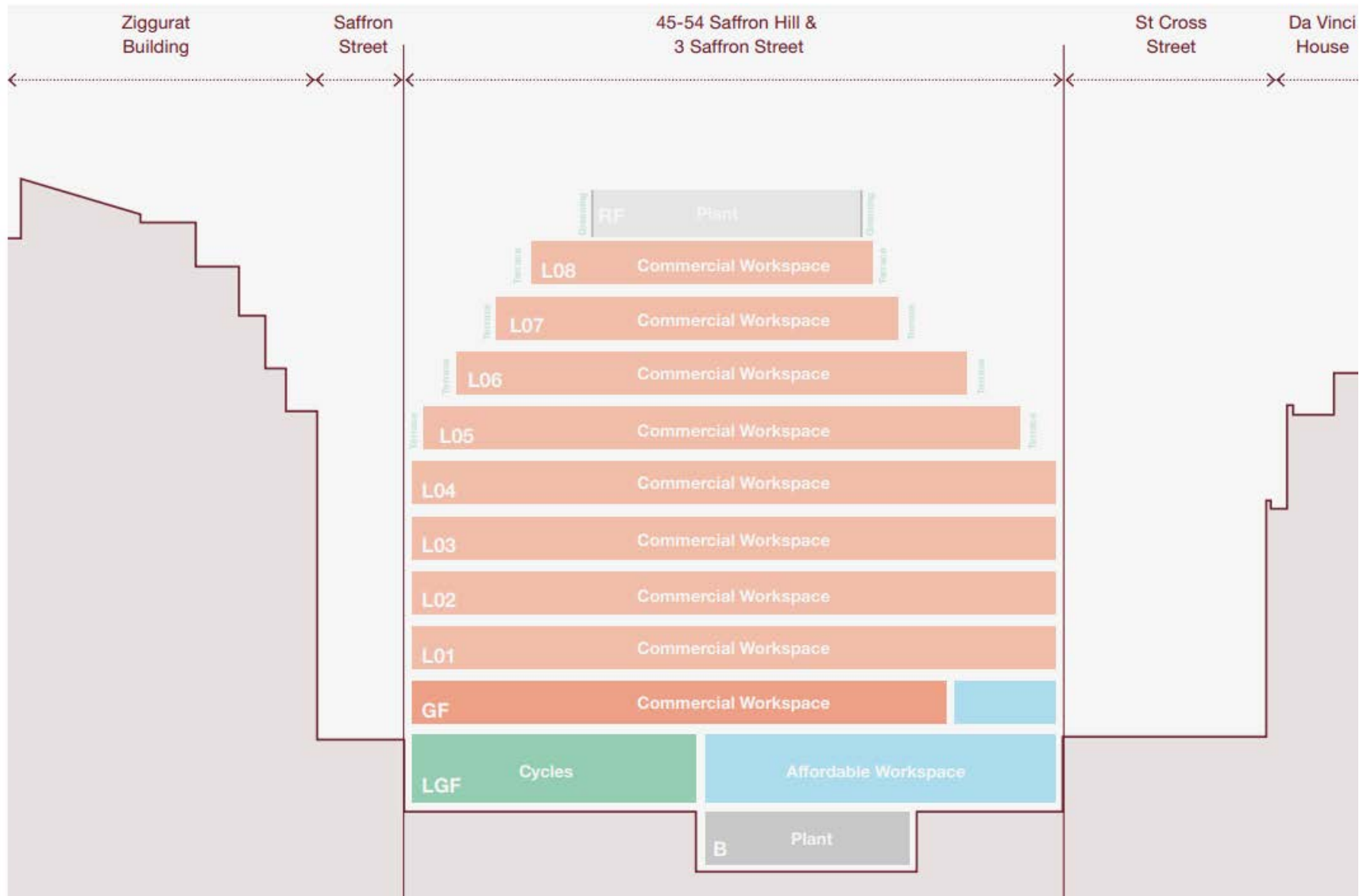
View 07. Saffron Street and Saffron Hill Corner looking East



View 04. Saffron Hill looking North



View 06. Saffron Hill looking South West



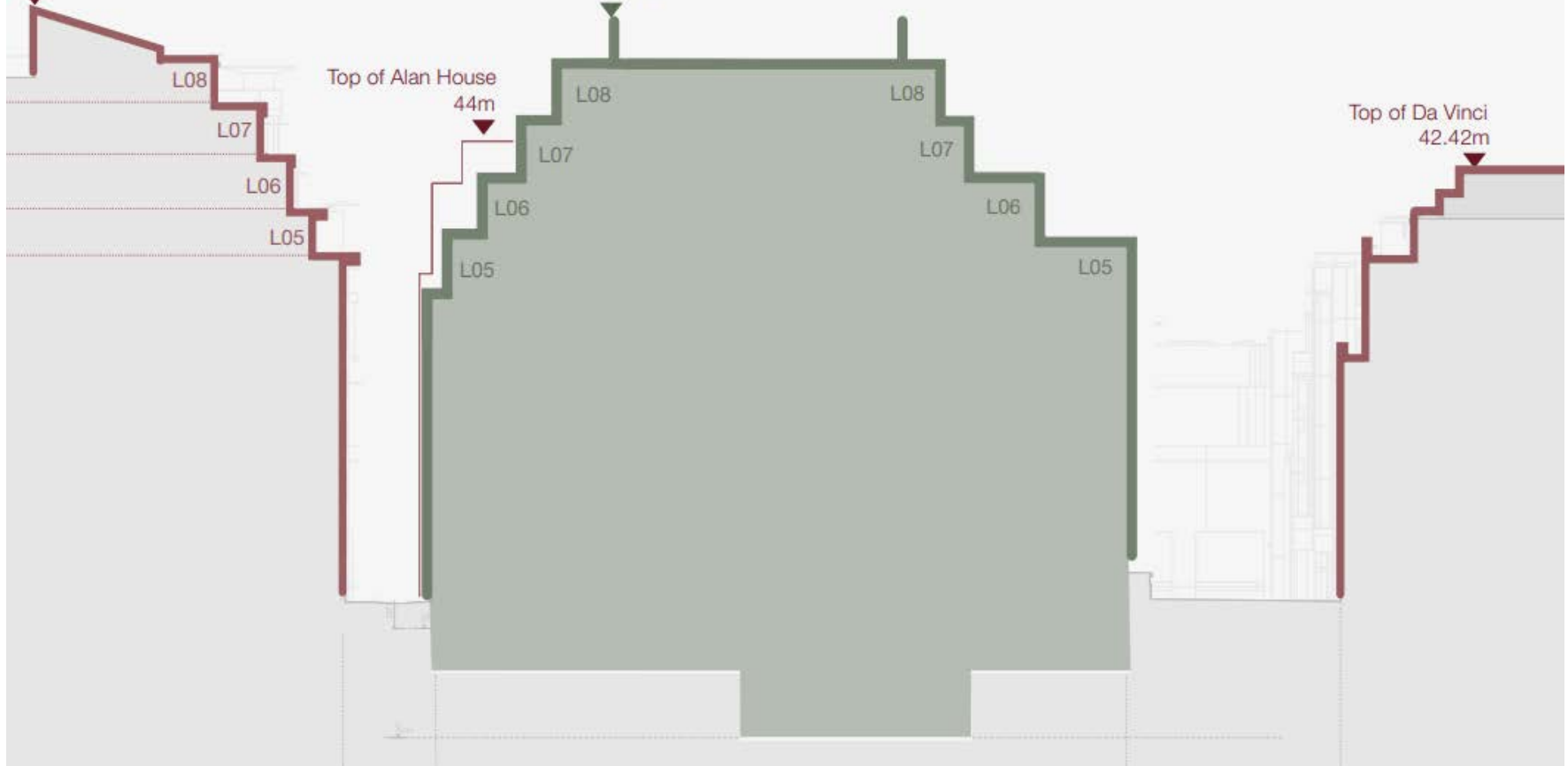
LVMF
59m AOD

Top of Ziggurat Building
52.88m

Top of Proposed Plant
52.2m

Top of Alan House
44m

Top of Da Vinci
42.42m





Cafe
Corner Entrance

Cafe Bay
Sash Window

Standalone Unit
Entrance

Standalone Unit
Bay

Main
Office Entrance



South Ground Floor Elevation, St Cross Street



Ground Floor Proposed Public Realm



Lower Ground Floor Layout



Ground Floor Plan, Office Waste



Ground Floor Plan, Cafe Waste



Overview

Base → Middle → Top →



Masonry Base

Metal Frames

Solar Shading

Profiled Spandrels

Greenery

Typical Bay Material Overview



1 Finish: Anodised
Substrate: Aluminium/Steel, Profiled Spandrels



2 Finish: Bespoke PPC
Substrate: Steel with Recycled Content



3 Finish: Bespoke PPC
Substrate: Composite window systems with timber internally and aluminium externally



CGI: South Facade Typical Bay





