

Address:	19 Charterhouse Street London EC1N 6RA		1
Application Number(s):	2025/1683/P	Officer: Adam Greenhalgh	
Ward:	Holborn and Covent Garden		
Date Received:	22/04/2025		
Proposal:	Remodelling, refurbishment and extension of the existing building to provide Use Class E (commercial, retail/restaurant and jewellery workspace), landscaped amenity terraces, balconies, relocated entrances, commuter facilities, on-site servicing yard and plant along with associated highway improvements and associated works.		
<p>Background Papers, Supporting Documents and Drawing Numbers:</p> <p>Existing Drawings: 00-DR-A-10100, 01-DR-A-10101, 02-DR-A-10102, 03-DR-A-10103, 04-DR-A-10104, 05-DR-A-10105, 06-DR-A-10106, 07-DR-A-10107, B1-DR-A-10098, LG-DR-A-10099, ZZ-DR-A-10000, ZZ-DR-A-10001, ZZ-DR-A-10002, ZZ-DR-A-10301, ZZ-DR-A-10302, ZZ-DR-A-10303, ZZ-DR-A-10304, ZZ-DR-A-10305, ZZ-DR-A-10306, ZZ-DR-A-10307, ZZ-DR-A-10401, ZZ-DR-A-10402, ZZ-DR-A-10403, ZZ-DR-A-10404, ZZ-DR-A-10405, ZZ-DR-A-10406, ZZ-DR-A-10407</p> <p>Demolition Drawings: 00-DR-A-11100, 01-DR-A-11101, 02-DR-A-11102, 03-DR-A-111003, 04-DR-A-11104, 05-DR-A-11105, 06-DR-A-11106, 07-DR-A-11107, B1-DR-A-11098, LG-DR-A-11099, ZZ-DR-A-11301, ZZ-DR-A-11302, ZZ-DR-A-11303, ZZ-DR-A-11304, ZZ-DR-A-11305, ZZ-DR-A-11306, ZZ-DR-A-11307, ZZ-DR-A-11401, ZZ-DR-A-11402, ZZ-DR-A-11403, ZZ-DR-A-11404</p> <p>Proposed Drawings: Building: 00-DR-A-02100, 00-DR-A-02101, 00-DR-A-02102, 00-DR-A-02103, 00-DR-A-02104, 00-DR-A-02105, 00-DR-A-02106, 00-DR-A-02107, 00-DR-A-02108, 00-DR-A-02109, 00-DR-A-02110, 00-DR-A-02111, 00-DR-A-02112, B1-DR-A-02098, LG-DR-A-02099 P02, ZZ-DR-A-02000, 00-DR-A-02001, 00-DR-A-02002, 00-DR-A-02301, 00-DR-A-02302, 00-DR-A-02303, 00-DR-A-02304, 00-DR-A-02305, 00-DR-A-02306, 00-DR-A-02307, 00-DR-A-02401, 00-DR-A-02402, 00-DR-A-02403, 00-DR-A-02404, 00-DR-A-02405, 00-DR-A-02406, 00-DR-A-02407, 00-DR-A-02351, 00-DR-A-02352, 00-DR-A-02353, 00-DR-A-02354, 00-DR-A-02355, 00-DR-A-02356, 00-DR-A-02357, 00-DR-A-02358, 00-DR-A-02359, 00-DR-A-02360, 00-DR-A-02361, 00-DR-A-02362</p> <p>Landscaping: 02-DR-L-09102, 03-DR-L-09103, 04-DR-L-09104, 05-DR-L-09105, 07-DR-L-09107, 08-DR-L-09108, 09-DR-L-09109, 10-DR-L-09110, 11-DR-L-09111, 12-DR-L-09112, ZZ-DR-L-09200, ZZ-DR-L-09300</p> <p>Documents:</p>			

Design and Access Statement (DSDHA - April 2025), Air Quality Assessment (Tetra Tech - 04.04.2025 - 784-B069877), Draft Construction/Demolition Management Plan (produced by Mace - 25/03/2025), Daylight and Sunlight Report (Point 2 - April 2025 - RELO7 V4); Preliminary Ecology Appraisal (Arbtech - 15/10/2024), Landscape and Ecological Management Plan (Arbtech 07/04/2025), Regeneration Statement and Employment and Training Strategy (Volterra - April 2025), Energy and Sustainability Statement (Sweco - April 2025), Whole Life Carbon Assessment (Sweco - March 2025), Circular Economy Statement (Sweco - 09/04/2025), Fire Statement (DAMA - 250036), Statement of Community Involvement (March 2025), Heritage, Townscape and Visual Statement (Turley heritage - March 2025); Noise Assessment (Sweco - 6520714-SWE-ZZ-XX-T-U-0001 - 17/03/20205), Drainage Strategy Report (Davies Maguire - DMAG-2352-DSR P02 - July 2025), Flood Risk Assessment (Davies Maguire - DMAG-2352-FRA - July 2025), Structural Feasibility Statement (Davies Maguire - DMAG-2352-RP-004 - February 2025), Transport Assessment (momentum - 03./04/2025), Travel Plan (Momentum - 25/03/2025), Delivery and Servicing Plan (Momentum 03/04/2025), Waste Storage and Collection Report (Momentum - 03/04/2025)

RECOMMENDATION SUMMARY:

Grant conditional Planning Permission following:

- (i) referral to Mayor of London for his direction;**
- (ii) finalisation of detailed wording for conditions following consultation with the Mayor; and**
- (iii) completion of section 106 Legal Agreement**

Applicant:	Agent:
Farrview Ltd	Newmark

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E (offices)		10,070	12,016	+ 1,946
E (retail/restaurant)		0	310	+ 310
E (jewellery workspace)		0	520	+520
Total	All uses	10,070	12,846	2,776

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference

Car - General	0	0	0
Car - Disabled accessible	0	0	0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	0	0	0
Cycle – commercial long stay	0	318	318
Cycle – short stay (all uses)	0	15	15

EXECUTIVE SUMMARY

- i) The site is at the junction of Charterhouse Street and Farringdon Road in the southeast corner of Camden and in the Hatton Garden Conservation Area.
- ii) The building is five/six storeys in height with an additional floor comprising plant on part of the roof. The northern part of the building has a basement.
- iii) The proposal is to remove the existing upper floor roof plant at 6th floor level and replace this with a roof extension at 6th floor plus a further three new storeys of accommodation stepping back at 7th, 8th and 9th levels. In addition, it is proposed to erect a 10th floor pavilion with terraces and soft landscaping. The proposal incorporates facade alterations including the formation of a double height glazed frontage with columns on Farringdon Road and Charterhouse Street and re-facing on the upper floors; double height openings on Saffron Hill are intended to enliven the frontage associated with retail/affordable jewellery workspace and Class E office uses.
- iv) The additional commercial floorspace would be in accordance with the Local Plan policies for economic growth and the enhancement and provision of office and retail uses in the Central Activities Zone. Policy E2 of the Local Plan requires 50% of new employment floorspace (above 200 sqm) in Hatton Garden to be affordable jewellery workspace. 520 sqm (19%) of the proposed additional floorspace is to be for affordable jewellery workspace. The Inclusive Economy Team considers that the proposal to provide the affordable jewellery workspace at a peppercorn rate in perpetuity (to be secured by a S106 agreement) is acceptable.
- v) The scheme has been the subject of five meetings with the Council's Urban Design Team and a Chair's review by the Design Review Panel (DRP). The DRP was held in October when the Panel offered broad support for the scheme as presented, providing further advice on design refinements. These have been responded to in the submitted design, e.g. through upper floor set-backs and active frontages onto Saffron Hill, façade alterations to reduce horizontality, refinement of 'lantern' and ground floor plinths, removal of new balconies onto Saffron Hill, removal/rationalisation of column/balconies at the entrance on Saffron Hill, use of sustainable concrete and high quality materials.

- vi) In urban design terms, the proposals meet the requirements of Local Plan policy D1 (Design) in terms of respecting local context and character. They accord with the policies for the conservation of heritage assets, are sustainable in design and construction, comprise details and materials that are of high quality and complement the local character; integrate well with the surrounding streets and open spaces; improve movement through the site and wider area with accessible and easily recognisable routes; are inclusive and accessible for all; are secure and designed to minimise crime and antisocial behaviour; preserve strategic and local views and provide high quality landscape design through planting of trees and other soft landscaping
- vii) The development would result in 'less than substantial harm' to existing heritage assets including the setting and appearance of the Grade II Listed building at 25 – 27 Farringdon Road and the Hatton Garden Conservation Area. The siting of the development has been set back in relation to 25 – 27 Farringdon Road to enable the attributes of the Listed building to be preserved in the streetscenes and the design of the proposals preserve the character of the Conservation Area in the context of the evolution of Farringdon Road and the retail/workshop character of Saffron Hill. The less than substantial harm to the heritage assets is considered to be outweighed by the public benefits ensuing from the development, including new and improved employment floorspace, retail/restaurant facilities and affordable jewellery workspace within Hatton Garden and urban design improvements.
- viii) No neighbouring occupiers would be unduly affected in terms of loss of light, privacy or outlook. Daylight and sunlight levels at the nearest residential windows and terraces would not be significantly reduced and the siting of the development would be such that the aspect from the residential properties in the surrounding area would not be significantly harmed.
- ix) Subject to a Servicing & Delivery Management Plan, Construction Management Plan and contributions to off-site cycling, highway works and pedestrian improvements in the area (all to be secured in a S106 agreement), the development would not prejudice the transport infrastructure.
- x) The S106 agreement would also secure the provision of appropriate employment and training contributions and a carbon off-set contribution to the equivalent zero carbon technologies in the Borough.
- xi) While requiring further information on design, transport and sustainable development, the GLA has offered broad support for the application at the Part 1 stage.
- xii) Officers conclude that the proposals accord with the policies of the Development Plan as a whole and that subject to the recommended conditions and planning obligations set out below, planning permission should be granted.

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)).

Reason for Referral to Mayor:

This application is referable to the Mayor of London under the provisions of Category 1B of the Schedule to the Town & Country Planning (Mayor of London) Order 2008: "Development outside of the City of London more than 30m in height"

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Town Centre (TC)	Central London Area
Conservation Area	Hatton Garden
LVMF views	Parliament Hill to St Paul's Primrose Hill to St Paul's Kenwood to St Paul's
PTAL (Public transport accessibility)	6a
Underground development constraints and considerations	- Archaeology (Tier II) - Subterranean (groundwater) flow - Slope stability - TfL red route

Table 1 - Site designations and constraints

Description

- 1.2 The site is located on the north-west corner of the junction of Charterhouse Street and Farringdon Road. Steps lead down to Saffron Hill to the west of the building and, over this, a four-storey bridge links the site to No. 17.
- 1.3 The site is located within the Hatton Garden Conservation Area and the existing building itself is not listed.
- 1.4 The existing building currently provides c.5,850 sq m NIA (c. 8,500 sq m GIA) of office accommodation arranged over lower ground, ground and five upper floors. The building also includes a partial basement to the northern portion of the site. The area contains predominantly retail and office land uses, and

it is in the southeast corner of Hatton Garden which is a jewellery specialist quarter. The site is also closely located to Smithfield Market and St Bartholemew's Hospital.

- 1.5 The listed buildings local to the site vary in their architectural styles owing to the differing periods of construction and include the next but one building to the north on Farringdon Road (25 & 27 Farringdon Road) (Grade II) and Smithfield Poultry Market in the City, to the southeast on the other side of Charterhouse Street (Grade II)
- 1.6 The site has a Public Transport Accessibility Level (PTAL) rating of 6a (Excellent) and is close to Farringdon Stations (Crossrail and London Underground), as well as 5 bus services on both sides of Farringdon Road and 1 service on Charterhouse Street.

2. THE PROPOSAL

- 2.1 The development proposals are summarised as follows:

- Re-configuration of ground and lower ground floors to provide affordable jewellery workspace (510 sqm) with their own entrances, retail/restaurant uses (320 sqm) and office lobby. A new, double height office entrance will be formed in the Farringdon Road elevation and a new frontage with 'double height' openings formed onto Saffron Hill. Cycle access and end of journey facilities will be in the lower ground floor accessed at grade from Saffron Hill. A loading bay will also be provided on Saffron Hill.
- The existing façade will be removed and replaced with a more energy efficient, contextually appropriate and contemporary design.
- The existing plant structure above level five is to be demolished and additional floors built. The existing building is 6 storeys in height (above ground level) with large roof-top plant enclosures. The proposed development increases this to 10 storeys (plus rooftop plant). Set-backs will be introduced on the new 7th, 8th and 9th floors on all elevations and the upper-most tenth floor pavilion would occupy part of the roof. A landmark feature 'lantern' will project into the skyline on the main Farringdon Road/Charterhouse Street corner of the building.
- A double height colonnade is proposed on south facing Charterhouse Street. Here the ground floor (and the proposed retail/restaurant unit) is set back from the boundary of the site, under the colonnade, to create an external 'public' space.

- Plant will be provided primarily in its current locations, which is partial basement to the north end of the site, the southern end of the Lower Ground floor and where air intake and extract is required at roof level in a double stack arrangement.

2.2 Details of the proposed design and materials are included in 'Design' below

3. **RELEVANT HISTORY**

The site:

2009/4737/P - Change of use of existing building from offices (Class B1a) to dual use as non-residential institution use (Class D1) and offices (Class B1a) – granted subject to a legal agreement – 18/01/2010

Surrounding area

London Borough of Islington:

Site of former Charter House, 2 Farringdon Road and Units 501-521 London Central Markets, Gate 30, 45 Charterhouse Street, London, EC1 - 2019/2991/S73 - Erection of 11 storey over basement building comprising 4 Class A1 retail units at ground floor level and Class B1 (office) above, plus ancillary facilities including provision for basement level servicing – granted subject to a legal agreement – 09/03/2020

City of London:

Poultry Market And General Market And The Annexe Buildings West Smithfield London EC1A 9PS – 19/01343/FULEIA - General Market Partial demolition, repair, refurbishment and extension of the existing building known as the General Market at 43 Farringdon Street on the basement, ground, first and roof levels; Change of use to provide a museum (the Museum of London) and ancillary uses and areas, together with a flexible retail, restaurant, drinking establishment and leisure (gym) use for the perimeter 'houses' – approved 13/04/2023

4. **CONSULTATION**

Pre-application consultation

- 4.1 A strategy of engagement with the local community, key stakeholders and representatives in the area for the purpose of receiving feedback on the pre-application proposals was undertaken.
- 4.2 Seven individual meetings were held during the pre-application process with representatives as follows:

Date	Stakeholder
January 9 th 2025	Members of the project team met with the landlord representatives of Atlantic House to discuss the proposals for the Site
January 14 th 2025	Members of the project team met with landlord representatives of 17 Charterhouse Street to discuss the proposals for the Site
January 20 th 2025	Members of the project team met with the landlord representatives of 48-50 Cowcross Street to discuss the proposals for the Site
January 24 th 2025	Members of the project team met with representatives from De Beers and Anglo American as the Site's immediate neighbours to discuss the emerging proposals for the Site.
February 5 th	Members of the project team met with representatives from the Central Alliance and Hatton Garden BIDs to discuss the emerging proposals for the Site
February 27 th 2025	Members of the project team met with the landlord representatives on behalf of the JJ Mack Building, 33 Charterhouse St, to discuss the proposals for the Site.
March 3 rd 2025	Members of the project team met with the landlord representatives on behalf of the 21 Farringdon Road, to discuss the proposals for the Site

- 4.3 The Applicant's approach to wider consultation saw a two-page flyer (appendix A) distributed to 1,567 addresses on the 24th January. The Applicant held a drop-in session on the 5th February 2025 from 4-7 pm at St Andrew's Church Holborn. The session included presentations of the proposals, design, façade and public realm activation, sustainability, public benefits, construction management and 'how to comment'. A social media campaign was organised to raise awareness of the drop-in session.

LB Camden Design Review Panel (held October 2024):

- 4.4 Camden's Design Review Panel made the following comments at pre-application stage:

'The panel supports the overall approach to the project. The strategy for reusing the existing structure, and the addition of extra storeys, promise to deliver a high quality, sustainable building.

However, the panel thinks the impact of the extra height on Saffron Hill should be reduced. It encourages greater emphasis on vertical elements in the southern and eastern elevations, and the introduction of façade depth to reduce horizontality, and create more shading. The panel also thinks that the open rooftop lantern should be reconsidered. The plinth needs further refinement, including greater variation, so it is more responsive in scale to that of neighbouring buildings on Farringdon Road, and to the smaller scale of Saffron Hill.

The panel thinks the south-east corner of the building should be more public, including a retail entrance if possible. The ground floor cut-back to Saffron Hill creates a dead-end and should be removed. Balconies projecting over Saffron Hill should be reconsidered. The existing column should be removed from the Saffron Hill stairs, if at all possible. Balconies bridging the steps need a clear design rationale. The Saffron Hill elevation should have windows on the ground floor to introduce an active frontage. The concrete used should be as sustainable as possible. High quality materials included in the existing building should be reused wherever they can'.

Officer response:

The additional storeys have been set back from the Saffron Hill elevation of the building and as such, they would not be overbearing or harmful to the character and perception of the street. The elevational design evolved during the pre-application process with amendments to the materials and application of bands and recesses to enhance the workshop character of Saffron Hill and align with the horizontal bands on the commercial buildings of Charterhouse Street and Farringdon Road. Further comments on the architectural design, including the lantern, are included in 'Urban Design' in the Assessment section below.

The ground floor set-backs on Charterhouse Street are considered to be a welcome feature which would be more inviting for users and passers-by. Previously proposed balconies projecting over Saffron Hill have now been removed. It is not possible to remove the column between the building and 17 Charterhouse Street. Active frontages are proposed to Saffron Hill. The rooftop lantern feature on the Farringdon Road/Charterhouse Street remains as it is considered to enhance the identity of the building and the dynamics of the roofscape. It has been designed to be playful and elegant. High quality materials are proposed throughout.

Statutory consultation on the planning application:

- 4.5 Consultation was carried out by the Council after receipt of the planning application by notifying statutory consultees and site and press notices were displayed in line with Camden's Statement of Community Involvement (2024). The following responses were received.

Statutory consultees

Greater London Authority (incl. Transport for London)

- 4.6 London Plan policies on land uses, affordable workspace, urban design, tall buildings, strategic views, inclusive design, fire safety, heritage, transport, energy, circular economy, whole life cycle carbon, sustainable drainage, and water efficiency are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- Land use principles: The proposed redevelopment of the site to provide additional office floorspace, resulting in the intensification of the site is strongly supported within the Central Activities Zone (CAZ). The proposed retail and affordable jewellery spaces are also supported.

Officer response:

Please see 'Land Use' within Assessment section below

- Design: The part retention and upward extension of the existing building successfully responds to the established and emerging character of the area. The proposal would marginally exceed the height of the Landmark Viewing Corridor in its wider setting consultation area in Parliament Hill and Blackheath Point panoramas, conflicting with London Plan Policy HC4. The breach would not be perceived by the naked eye from either of the viewpoints, raising no strategic urban design concerns, and therefore, on balance, is acceptable.

Officer response:

Please see 'Design:- LVMF views, Tall Building Assessment, Urban Design, Heritage' within Assessment section below

- Heritage: The proposals would result in less than substantial harm to heritage assets. GLA officers consider that harm is caused by the proposed development to the following assets: 25 – 27 Farringdon Road (Grade II Listed): Views 4 and 5, and the Hatton Garden Conservation Area: Views 1, 2, 3 and 5. Subject to agreeing and securing the public benefits, the less than substantial harm identified could be clearly and convincingly outweighed by the public benefits of the scheme. An update will be provided at Stage II.

Officer response:

Please see 'Design:- LVMF views, Tall Building Assessment, Urban Design, Heritage' within Assessment section below

- Transport: (Note: Transport for London (TfL) were consulted and comments were provided to the GLA as below):

Active Travel Zone (ATZ) improvements should be secured as part of the proposal, in line with the ATZ report recommendations. Additional information should be provided by the applicant to demonstrate how both cyclist and delivery vehicles can safely utilise the proposed access from Saffron Hill. Conditions and obligations should secure travel plans, Detailed Construction Logistics Plan (CLP), Delivery and Servicing Plan.

Officer response:

Please see 'Transport' within Assessment section below

- Environment and sustainable infrastructure: With regard to carbon emissions, the GLA has advised that 'all items have now been closed off that can be at this stage. The applicant has updated the modelling which doesn't quite meet the 35% target, but the GLA Energy Team have advised that with a 33% improvement, nothing further is required in this instance'. In terms of the 'Circular Economy' the applicant has additionally submitted a Condition and Feasibility, Waste Storage and Collection Report (and further information) which are welcomed.

A condition to submit post-construction Circular Economy monitoring should be secured. In terms of Whole Life Carbon, no further information is required. A condition to secure a post-construction assessment of the development's Whole Life Carbon emissions should be required.

The initial comments from the GLA on the Sustainable Drainage Strategy generally did not comply with Policy S113. The Drainage Strategy was required to be revised to incorporate a range of SUDS at the top of the

drainage hierarchy to provide the required water quantity, quality, biodiversity, and amenity benefits. An updated Drainage Strategy was received which resolved similar concerns from the Lead Local Flood Authority. Additional information is also required regarding how the water consumption targets are to be achieved to demonstrate conformity with London Plan Policy SI5. Mitigation in relation to air quality should be secured.

Officer response:

The Council notes the GLA's agreement to the proposed carbon emissions and the Council will require a carbon off-set contribution to be secured under a S106 agreement to fund off-site carbon reduction measures which will have the net effect of resulting in a 'zero carbon' development. The Condition and Feasibility Report has been deemed to justify the proposed demolition and building works and conditions are attached to the decision to secure post-construction Circular Economy and Whole Life Carbon monitoring to ensure that building materials are efficiently used and the development does not add to the deleterious discharge of emissions or waste. The provision of Sustainable Drainage measures is by way of blue roofs, with details of all SuDS to be secured under a condition. Conditions are also attached in respect of air quality measures and monitoring during and post construction.

Thames Water (Sewers and water infrastructure)

Informatives requested to advise on minimum pressure/flow rates, to minimise groundwater discharges into the public sewer (See recommended decision)

Conditions requested for a) details of any development to take place within 5m of a water main to be submitted and approved (prior to construction) and b) a Piling Method Statement to be submitted and approved (prior to any piling) (See recommended decision)

Thames Water (Waste Water)

Foul Water:

There will be sufficient sewerage capacity in the adjacent combined sewer network to serve your development.

Surface Water:

Before we can consider your surface water needs, you'll need written approval from the lead local flood authority that you have followed the sequential approach to the disposal of surface water and considered all practical means. If the above surface water hierarchy has been followed,

and if the flows are restricted to the rates stated in the beginning of this letter, then Thames Water would not have any objections to the proposal.

Officer response:

See 'Flooding & Drainage' in the Assessment section below. In this case, the development incorporates SUDS and blue roofs with a capacity of 102.8 m³ and run-off of 7.04 l/s which is a significant reduction from the existing discharge rate of 60.22 l/s for a 1 in 100 year rainfall event. Details of this system will be secured by condition 226

Adjoining occupiers

- 4.7 Site notices were displayed on Farringdon Road (2), Charterhouse Street (1) and Saffron Hill (1). The notices were displayed on 29/04/2025 until 23/05/2025 and the application was advertised in the local paper on 01/05/2025 (expiring 25/01/2025).
- 4.8 Objections were received from at least 13 neighbouring occupiers/owners (including 2 letters from the owners/occupiers of the immediately adjoining site, 17 Charterhouse Street, from 17 - 23 Farringdon Road and 28 Saffron Hill (2); a letter on behalf of 28 Saffron Hill, 1 & 7 Bleeding Heart Yard and 19 Greville Street and 8 letters from residents of Vesage Court on the Gamage's Estate). The objections received by the Council are on the Council's website. The key issues raised are:

Inadequate consultation:

Officer response:

Consultation in accordance with the Town and Country Planning Act and LB Camden Statement of Community Involvement was undertaken. This is documented in para 4.5 above. The consultation requirements have been observed by the Council and all consultation responses received until the publication of this report have been taken into consideration.

Inaccurate description of development:

Officer response:

The description of development summarises the full compendium of proposals. The proposals are fully depicted on the application drawings and in the application documents.

Substantial demolition contrary to climate change and conservation policies:

Officer response:

See 'Redevelopment Strategy' in 'Sustainability & Energy' in the Assessment below.

Proposal will create a tall building in an inappropriate location:

Officer response:

There is no specific definition of a tall building in the adopted Local Plan. The text to policy D1 (Design) states: 'Tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline'. The policy itself notes that 'All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above (i.e. in policy D1) and we will also give particular attention to: how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline; the historic context of the building's surroundings; the relationship between the building and hills and views; the degree to which the building overshadows public spaces, especially open spaces and watercourses; and the contribution a building makes to pedestrian permeability and improved public accessibility. In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.'

An assessment of the extent to which the proposal would create a tall building, and the appropriateness of the elements of tall building (in the context of the Local Plan and Draft Local Plan) is included in the assessment section 'Design:- LVMF Views, Tall Buildings Assessment, Urban Design, Heritage'.

Essentially, the development does meet the definition of a tall building in the new Draft Local Plan. Furthermore, the objection notes that the site is not within the area allocated for tall buildings in the Draft Local Plan. However, the policy does not expressly exclude proposals for tall buildings outside of the designated locations. Indeed the policy (policy D2) expressly states that 'The Council will assess proposals for buildings above the heights set out in Part A against the London Plan tall buildings policy and the design criteria in Local Plan Policy D1 (Achieving Design Excellence).'

As can be seen from the assessment in the Design section below, the proposal complies with the criteria in policy D2 of the Draft Local Plan and the London Plan tall buildings policy and it is therefore appropriate.

Unacceptable losses of sunlight and daylight for neighbouring occupiers:

Officer response:

See 'Daylight & Sunlight' in 'Neighbouring Occupiers Amenity below'. Daylight and sunlight levels at the neighbouring residential windows and terraces would not be reduced to the extent that there would be unduly increased overshadowing.

Loss of light to PV panels on roof of 17 Charterhouse Street:

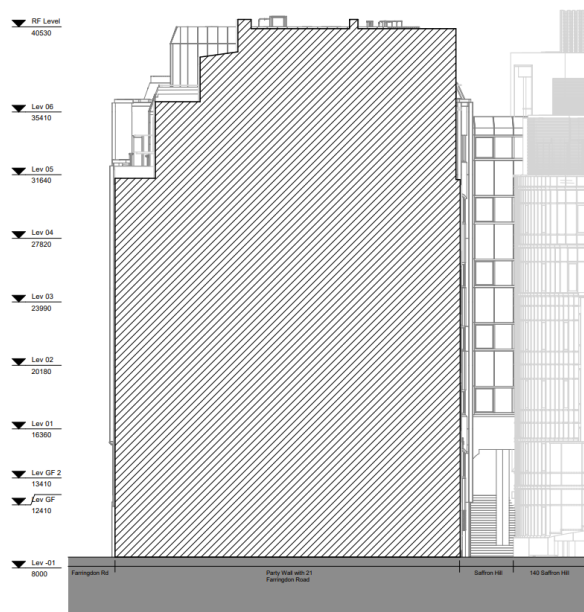
Officer response:

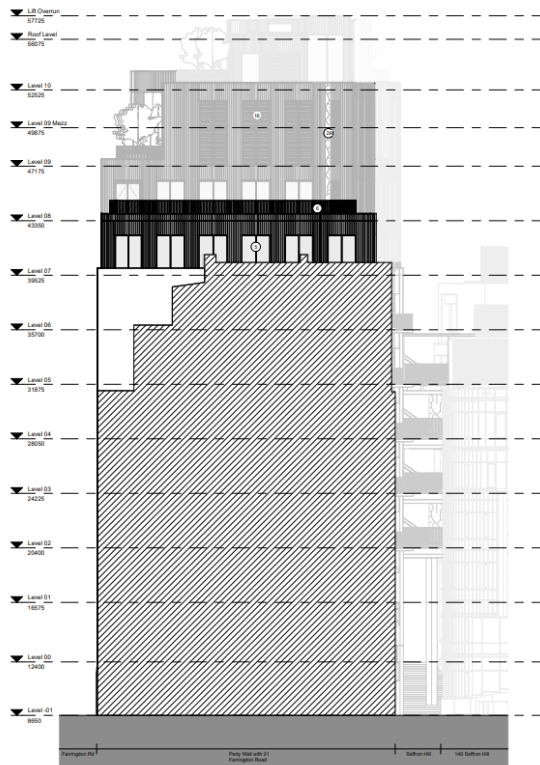
Situated to the east, the proposed development would only result in a low level of overshadowing of the panels on the roof of 17 Charterhouse Street. If there were significant impacts on the performance of the panels then civil action would be applicable.

Loss of light and overshadowing of Saffron Hill:

Officer response:

As can be seen from the existing and proposed north elevations (below), the existing building already rises seven storeys (40m) in height alongside Saffron Hill, and the additional storeys, which would be set back, would not result in a significant change to the (light) conditions at street level.





Wind tunnel effects along Saffron Hill:

Officer response:

The additional floors are set back from the Saffron Hill elevation meaning that they do not result in an increase in the sheer façade along Saffron Hill. This would help to mitigate against wind tunnelling effects at street level as a result of the upward extensions.

Excessive scale and massing, adverse impacts thereto:

Officer response:

The scale and massing of the proposal are addressed in the Design section (i.e. townscape effects) and Neighbouring Occupiers Amenity section (i.e. outlook and overbearing effects) below. Consideration of the impacts on the townscape and the amenity of surrounding occupiers is undertaken in these two sections below.

Harm to character and appearance of heritage assets (without any public benefits)

Officer response:

The effects on the character and appearance of the Conservation Area, including Saffron Hill, Farringdon Road and neighbouring Listed buildings are

considered in 'Heritage' in the Assessment section below. The development would result in 'less than substantial harm' to the setting of the neighbouring Listed building 25-27 Farringdon Road and the Hatton Garden Conservation Area. The less than substantial harm to the heritage asset would be outweighed by the public benefits ensuing from the development, vis: new and improved employment floorspace meeting current standards, new retail/restaurant facilities, affordable jewellery workspace, improved permeability, legibility and urban design.

Highway and security impacts on Saffron Hill and Farringdon Road

Objections are raised on grounds of the inadequacy of Saffron Hill to accommodate servicing vehicles and impacts on access to Saffron Hill from the highway. Loss of access and effects on highway safety on Farringdon Road and Charterhouse Street during construction are mentioned. The constraints of Saffron Hill will impact upon the use of the adjoining building and the security of Saffron Hill.

Officer response:

A Delivery and Servicing Plan (DSP) was provided with the application. A loading bay is proposed south of the controlled bollards which are owned and operated by De Beers at neighbouring 17 Charterhouse Street, and with access rights for the proposed development. Vehicles would reverse into the loading bay from Saffron Hill, and egress in forward gear to travel north along Saffron Hill. Swept paths analysis for a 3.5t panel van is considered acceptable. There is limited space for larger vehicles to turn within the site. The site is privately owned and there would be no undue loss of highway safety or obstruction of the highway or neighbouring sites. Nevertheless, a detailed Delivery and Servicing Plan is to be secured under a S106 agreement, including arrangements for delivery and servicing vehicles to access the site without compromising the safety of occupiers of the building or other users of Saffron Hill. .

Loss of highway access and effects for highway users and surrounding occupiers during construction would be mitigated by a Construction Management Plan. See 'Transport' in the Assessment section below for further information.

A condition is attached to require the submission, approval and implementation of external lighting to provide a sufficient degree of security for the area (i.e. Saffron Hill).

Excessive traffic, noise, dust and disturbance to neighbouring occupiers during construction

Officer response:

Traffic, noise, dust and disturbance during demolition/construction works are controlled by way of Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents. These will therefore be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

With respect to emissions (dust and particulate matter) during demolition/construction, see 'Air Quality' in the Assessment below.

Lack of 'public benefits':

Officer response:

The public benefits associated with the development new and improved employment floorspace, retail/restaurant facilities and affordable jewellery workspace within Hatton Garden and urban design improvements.

Provision of affordable jewellery workspace below policy (E2) requirement and inadequate transport arrangements to serve affordable jewellery workspace

Officer response:

The quantum of affordable jewellery workspace would be below the policy requirement. This is for 50% of the additional new floorspace (i.e. 1,338 sq m) to be affordable jewellery workspace. In this case, 520 sq m of affordable jewellery workspace is proposed at peppercorn rents, in perpetuity. The proposal to provide this quantum of affordable jewellery workspace at a peppercorn rate is considered to be acceptable by the Council's Inclusive Economy Team. Further comments on the affordable jewellery workspace are included in the 'Land Uses' section in the Assessment below.

Height and effects on outlook/protected views, including transgression of LVMF protected view

Officer response:

See 'Design: LVMF views' in 'Assessment' below. An assessment on the effects on the outlook of residential occupiers is included in 'Neighbouring Occupiers Amenity'. The GLA, in their Stage One planning application response, have noted that the development would not breach the protected LVMF views by the naked eye, raising no strategic urban design concerns, and therefore on balance, being acceptable.

Harm to heritage assets

Officer response:

The owner/occupier of the adjoining building, 17 Charterhouse Street, submitted a Heritage Impact Assessment by Vitruvius Heritage which identified the following heritage assets which would be affected by the proposals:

- *St Paul's Cathedral (Listed Grade 1)*
- *25 – 27 Farringdon Road (Listed Grade 2)*
- *St Ethelreda's Church (Listed Grade 1)*
- *Hatton Garden Conservation Area*

The submitted Heritage Impact Assessment describes the significance of the heritage assets and assesses the effects on the significance of the heritage assets. The Council's assessment of the effects on the heritage assets is included in Design: 'Design:- LVMF Views, Tall Building Assessment, Urban Design, Heritage' below. 'Less than substantial harm' is assessed to be caused to two heritage assets (the Grade II Listed 25 – 27 Farringdon Road and the Hatton Garden Conservation Area). The less than substantial harm to the heritage assets is outweighed by the public benefits associated with the development and the development therefore accords with the policies for conserving the historic environment.

Privacy impacts from elevated terraces and balconies

Officer response:

There are no immediately adjoining residential properties with windows or amenity areas directly facing the site. St Andrew's House, to the west of the site, is over 20m from the new roof-top storeys and terraces and it is guest accommodation. Also see 'Daylight and Sunlight' in 'Neighbouring Occupiers Amenity' in the Assessment section below.

- 4.9 A letter of support was received from Camden Enterprise Ltd operating as Centa Business Services. Support was given on grounds of provision of affordable jewellery workspace to enhance the creative economy, provide employment and training opportunities and attract visitors to the Borough. The development aligns with Camden's economic and cultural strategies, promoting sustainable local enterprise and reinforcing the borough's reputation as a centre for creative industries.

5. POLICY

National and regional policy and guidance

National Planning Policy Framework 2024 (NPPF)
National Planning Practice Guidance (NPPG)

London Plan 2021 (LP)

GG1 Building strong and inclusive communities

GG2 Making the best use of land
GG5 Growing a good economy
GG6 Increasing efficiency and resilience
SD4 The Central Activities Zone (CAZ)
SD5 Offices, other strategic functions and residential development in the CAZ
D1 London's form, character and capacity for growth
D4 Delivering good design
D8 Public realm
D9 Tall buildings
D14 Noise
E1 Offices
E2 Providing suitable business space
E3 Affordable workspace
HC1 Heritage conservation and growth
HC4 London View Management Framework
G5 Urban greening
G6 Biodiversity and access to nature
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 4 Managing heat risk
SI 7 Reducing waste and supporting the circular economy
SI 8 Waste capacity and net waste self-sufficiency
SI 12 Flood risk management
SI 13 Sustainable drainage
T1 Strategic approach to transport
T2 Healthy Streets
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.2 Office Parking
T7 Deliveries, servicing and construction
T9 Funding transport infrastructure through planning
DF1 Delivery of the Plan and Planning Obligations

London Plan Guidance (LPG)

Accessible London SPG
Characterisation and Growth Strategy LPG
London View Management Framework SPG
Urban greening factor LPG (February 2023)
Air quality positive LPG
Air quality neutral LPG
Be Seen energy monitoring LPG
Circular economy statements LPG
Energy Planning Guidance
The control of dust and emissions in construction SPG
Whole life carbon LPG
Sustainable Transport, Walking and Cycling

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth
Policy C5 Safety and security
Policy C6 Access for all
Policy E1 Economic development
Policy E2 Employment premises and sites
Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy A4 Noise and vibration
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 T1 Prioritising walking, cycling and public transport
Policy T2 Parking and car-free development
Policy T3 Transport infrastructure
Policy T4 Sustainable movement of goods and materials
Policy DM1 Delivery and monitoring

Supplementary Planning Documents and Guidance

Access for All CPG - March 2019
Adverts CPG - March 2018
Air Quality - January 2021
Amenity - January 2021
Artworks, statues and memorials CPG - March 2019
Basements - January 2021
Biodiversity CPG - March 2018
Community uses, leisure and pubs - January 2021
Design - January 2021
Developer Contribution CPG - March 2019
Digital Infrastructure CPG - March 2018
Employment sites and business premises - January 2021
Energy efficiency and adaptation - January 2021
Housing - January 2021
Planning for health and wellbeing - January 2021
Public open space - January 2021
Student housing CPG - March 2019
Town centres and retail - January 2021
Transport - January 2021
Trees CPG - March 2019
Water and flooding CPG - March 2019

Other guidance:

Hatton Garden Conservation Area appraisal and management strategy
2017

Draft Camden Local Plan

The Council has published the Camden Local Plan Proposed Submission Draft for consultation. The consultation closed on Friday 27 June 2025. The document sets out the Council's vision for future development in Camden for the next 15 years. 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).

Holborn Vision Supplementary Planning Document (SPD) on 29 January 2025

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:- LVMF Views, Tall Building Assessment, Urban Design, Heritage
9	Neighbouring occupiers amenity
10	Sustainability & Energy
11	Air Quality
12	Transport
13	Landscaping & Biodiversity
14	Employment, training & opportunities
15	Waste storage and collection
16	Fire Statement
17	Crime Impact Assessment
18	Flooding & Drainage
19	Community Infrastructure Levy

7. LAND USE

- 7.1 The site is in the Central London Area but it is not within any Site Allocations in the Council's adopted Site Allocations Plan, or on the Site Allocations Plan associated with the new Draft Local Plan.

Existing Use

- 7.2 The building was previously all offices, however, on 18 January 2010 planning permission ref. 2009/4737/P was granted, subject to a s.106

Agreement, for: "Change of use of existing building from offices (Class B1a) to dual use as non-residential institution use (Class D1) and offices (Class B1a)."

- 7.3 The new Class D1 element was to be used by the London College of Accountancy (LCA) (Anglia Ruskin University) and planning permission 2009/4737/P is specific to this operator. Educational uses are generally protected under Local Plan Policy C2, however the Officer Report for 2009/4737/P stated that, "The dual use of the building would ensure the establishment of the D1 elements of the proposal. However, given the building's location within the Hatton Garden Area it would be necessary for the D1 element to change back to B1 use once the current occupier vacates the building."
- 7.4 The reversion is secured via Condition 3 that states: '*This permission is personal to the London College of Accountancy and shall endure for the period of their occupation only. On the London College of Accountancy vacating the premises the use shall revert to the lawful use for office (B1 use) purposes*'.
- 7.5 The London College of Accountancy is due to vacate the building in August 2025. At this time, the lawful use of the entire building will revert to office (Class E) use. In view of this a proposed use which does not retain the educational floorspace is acceptable and is not considered to be contrary to policy.
- 7.6 ***Proposed Uses***
- 7.7 The development would provide remodelled and new commercial (Class E) floorspace. On the lower ground and ground floors there would be areas of jewellery workspace (Class E), retail/restaurant (Class E) offices and associated circulation and servicing space (including significant cycle parking space and changing rooms). On the first to ninth floors would be offices with a pavilion and terraces on the tenth floor at roof levels.
- 7.8 No change of use as such is proposed as the proposed uses lie within Class E (commercial) of the Use Classes Order, as per the existing lawful use of the building (explained within 6.2 – 6.5 above).
- 7.9 The site is located within the Central London Area's Central Activities Zone, which the London Plan identifies as a nationally important strategic office location. The GLA, in their Part 1 response, have noted: '*The proposed redevelopment of the site to provide additional office floorspace is strongly supported within the Central Activities Zone (CAZ). The proposal will result in an uplift of 2,776 sqm. of office floorspace, delivering intensification of office space within the CAZ, in line with Policy SD4 of the London Plan. The*

proposed land use and intensification of office floorspace is acceptable in principle’.

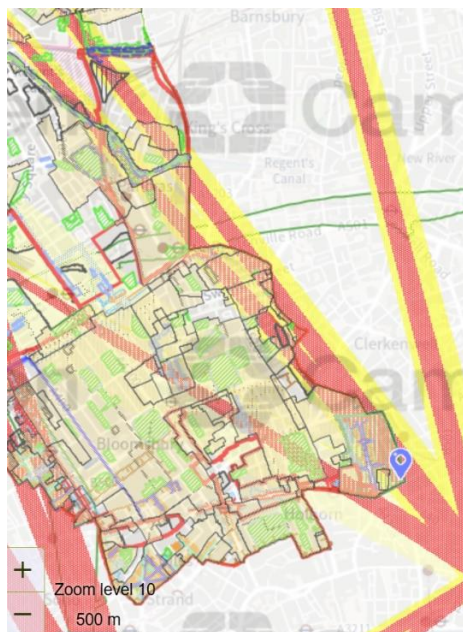
- 7.10 The Central London Area is indicated as being appropriate for growth under policy G1 of the Local Plan.
- 7.11 Policy E1 of the Local Plan supports the provision of a range of business and employment floorspace including the intensification of existing employment sites and seeks to direct new economic development to the growth areas, including Central London. The policy notes that *‘Hatton Garden has been an established centre for the jewellery industry since the 19th Century and today the area is home to nearly 500 businesses and over 50 shops related to the industry. In order to promote Hatton Garden as a location for jewellery related uses, the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses through planning obligations.’*
- 7.12 Policy TC1 of the Local Plan seeks to enhance the provision of shopping and related uses in appropriate Central locations.
- 7.13 Given the site’s location within the Central Activities Zone, the uplift in office floorspace and provision of new jewellery workspace and retail/restaurant space is considered appropriate development in this location which would contribute towards a successful and inclusive economy, in accordance with both local and regional policies, including policies G1, E1, E2 and TC1 of the Camden Local Plan, and London Plan policies GG1, GG2, E1, and SD4.
- 7.14 Policy E2 of the Local Plan requires 50% of new employment floorspace (above 200 sqm) in Hatton Garden to be affordable jewellery workspace. 520 sqm of the proposed additional floorspace is to be for affordable jewellery workspace. The affordable jewellery workspace will be provided at peppercorn rents within two self-contained units with frontages onto Saffron Hill. The policy requirement for the proposed development, which totals 2,776 sq m of new floorspace, would be 1,388 sq m of affordable jewellery workspace. Whilst the proposed quantum is below the 20% suggested by the policy at peppercorn rents it is considered to be a meaningful level of provision on site.
- 7.15 The applicant has approached a preferred partner (Centa) “to operate the space and they have already fed into the design, with each unit being directly accessible from the street. There is the option to provide larger or smaller units as demand dictates and shopfront grilles will enable higher volume ventilation as required.
- 7.16 The units will be secured at peppercorn rents in perpetuity. This will be secured via s106 agreement. The S106 agreement will require the affordable jewellery workspace to be included within a commercial space plan and subject to a delivery plan, including fitting out.

- 7.17 The Inclusive Economy Team considers that the proposal to provide the proposed affordable jewellery workspace at peppercorn rents in perpetuity (to be secured by a S106 agreement) to be acceptable. The GLA has also welcomed the proposal for the affordable jewellery workspace in their planning application (Part 1) response.

8. DESIGN

LVMF VIEWS

- 8.1 The site lies within the viewing corridors of three London View Management Framework (LVMF) views: namely 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 6A.1 (Blackheath Point). These views were designated in order to protect and manage key views of London's city skyline, including an appreciation of Strategically Important Landmarks comprising highly graded heritage assets such as the Grade I listed St Paul's Cathedral and the Grade II* listed Old Bailey.
- 8.2 The LVMF views from Parliament Hill, Kenwood and Blackheath Point are shown on the LB Camden Local Plan policies map. They are shown in red on the images below:



Extract from Local Plan policies map showing location of the site (blue marker), LVMF views from Kenwood and Parliament Hill

- 8.3 The Heritage, Townscape and Visual Assessment which has been submitted includes photographs of the existing and proposed views, with the LVMF views outlined in red (existing) and the proposed development shown in blue.

Protected view from Parliament Hill:



Existing view from Parliament Hill (LVMF view shown by red line)



Proposed view from Parliament Hill (LVMF view shown by red line; proposed building shown by blue line)

In this case, testing illustrates that the proposed development would exceed the threshold plane of the Landmark Viewing Corridor by a maximum of 652mm – therefore a technical breach of the viewing corridor of the Grade I listed St Paul's Cathedral and Grade II* listed Old Bailey. The actual impact of this breach on the view of St Paul's Cathedral would be imperceptible at this scale to the human eye. The proposed development, insofar as legible (the blue line), will appear between the dome and the western towers, well below the base of the peristyle, as part of the middle ground 'miscellany' of

roofs. There would be no material impact on the legibility and appreciation of the Cathedral itself. Similarly, the dome to the Old Bailey Central Criminal Court will remain fully visible and legible.

Protected view from Kenwood:



Existing view from Kenwood (LVMF view shown by red line)



Proposed view from Kenwood (LVMF view shown by red line; proposed building shown by blue line)

- 8.4 In this case testing illustrates that the proposed development would marginally exceed the threshold plane of the Landmark Viewing Corridor by 98mm – therefore a technical breach of the viewing corridor of the Grade I listed St Paul's Cathedral and Grade II* Old Bailey. 7.62 The actual impact of this breach on the view of St Paul's Cathedral would be imperceptible at this scale to the human eye. The very upper element of the proposed development will appear, insofar as legible, in the foreground and to the west of the Old Bailey Central Criminal Court, not affecting its legibility. Similarly, the Proposed Development would appear to the west of the western towers of St Paul's Cathedral, which remain fully visible.

Protected view from Blackheath Point:



Existing view from Blackheath Point (LVMF view shown by red line)



Proposed view from Kenwood (LVMF view shown by red line; proposed building shown by blue line)

- 8.5 The proposed development would exceed the threshold plane for the background wider setting consultation area by 5,310mm (5.310m). The site is located beyond and to the far east of St Paul's Cathedral. The upper elements of the building, insofar as perceptible at this range, would appear as part of the surrounding roofscape, distant from the Cathedral. The proposed development would therefore preserve the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers and have a neutral effect.
- 8.6 As the development would breach the protected LVMF views, consultation has been undertaken with the Greater London Authority (GLA). The GLA has advised '*In wider views, the proposal would marginally exceed the height of the Landmark Viewing Corridor in its wider setting consultation area in Parliament Hill and Blackheath Point panoramas, conflicting with London Plan Policy HC4. The breach would not be perceived by the naked eye from either of the viewpoints, raising no strategic urban design concerns, and therefore, on balance, being acceptable.*'

URBAN DESIGN

TALL BUILDING ASSESSMENT

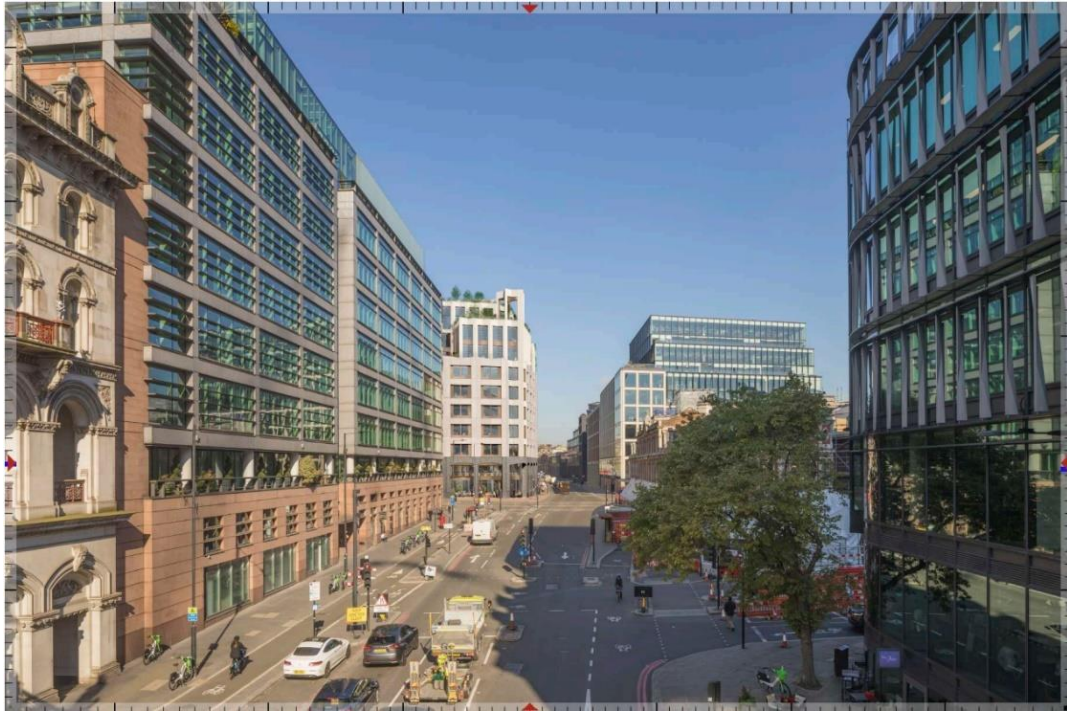
- 8.7 Several of the letters of objection which have been received refer to the height and scale of the proposed building. It is asserted that the proposed building, which would comprise ten storeys, would not comply with the policy

advice for Tall Buildings in the 2017 Local Plan (policy D1) and the specific policy on Tall Buildings (policy D2) in the Draft Local Plan 2025.

- 8.8 There is no specific definition of a tall building in the adopted Local Plan, but the development does meet the definition of a tall building in the Draft Local Plan (2025).
- 8.9 In terms of the adopted Local Plan, in addition to the design criteria which apply to all forms of development, tall buildings in the Borough will be considered in relation to the following specific tall buildings criteria:
- how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
 - the historic context of the building's surroundings;
 - the relationship between the building and hills and views;
 - the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
 - the contribution a building makes to pedestrian permeability and improved public accessibility.
- 8.10 Furthermore, policy D1 states that tall buildings will be assessed against other relevant planning issues – i.e. amenity, mixed use and sustainability. These issues are addressed in other sections of this report.
- 8.11 With respect to the policy (D2) for Tall Buildings in the Draft Local Plan (2025) this does not 'rule out' a new tall building at the site. It is acknowledged that the policy includes a list of areas where new tall buildings may be appropriate (i.e. Table 12, illustrated by way of Figure 22). However, the policy essentially advises that applications for tall buildings should be considered in relation to the London Plan tall buildings policy and the design criteria in Local Plan policy D1. Like in the adopted Local Plan, the policy lists specific criteria against which an application for a tall building should be considered, vis:-

1. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, having regard to both the existing and the emerging context;
2. the relationship between the building and neighbouring boroughs, where tall buildings are proposed close to the borough boundary;
3. whether the proposal maximises energy efficiency and resource efficiency in accordance with Climate Change Policies CC3, CC4 and CC6;
4. whether the development delivers the highest standards of sustainable design and construction in line with Policy D1 (Achieving Design Excellence);
5. whether the proposal maximises the supply of affordable housing in accordance with Policy H4 (Affordable Housing);
6. whether the proposal creates a safe and secure environment in accordance with Policy A2 (Safety and Security);
7. whether the site is of a sufficient size to accommodate a tall building, without having a detrimental impact on existing buildings, public spaces and amenity;
8. the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets in accordance with Policy D5 (Historic Environment);
9. the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views;
10. the contribution a building makes to pedestrian movement and experience, connectivity and improved public accessibility;
11. the degree to which the building overshadows neighbouring buildings and spaces, especially public spaces, open spaces, watercourses and renewable energy infrastructure;
12. the relationship between the building and other neighbouring tall buildings;
13. the contribution the development makes to wider place making objectives and infrastructure delivery in line with Policies DS1 (Healthy and Sustainable Development), D1 (Achieving Design Excellence) and DM1 (Delivery and Monitoring);
14. the quality of homes and amenities provided;
15. the proposed internal and external illumination of the building. All tall building proposals will require a Lighting Strategy; and
16. the impact on biodiversity, for example migratory routes and bird collisions, in accordance with Policy NE2 (Biodiversity).

- 8.12 It has been demonstrated (in 'LVMF views' above) that the height and size of the development would not harm the protected 'long range' views within Camden and, conversely, from Blackheath Point.
- 8.13 Within the surrounding area, the proposed building is considered to be within the prevailing height and form of buildings already extant on Farringdon Road and it would not harm the character or appearance of the streetscenes or roofscapes.
- 8.14 Within the immediate urban context, Farringdon Road and Charterhouse Street have broadly consistent massing. Taller buildings are located all along the eastern side of Farringdon Road, and directly south of the site.



CGI of proposed development and neighbouring 9 and 11 storey development on Farringdon Road

- 8.15 The prevailing scale and character of the area are noted by the GLA. In their Part 1 consultation response they note that while the site is not identified in the Draft Local Plan as being designated for a tall building (as required by the London Plan policy on Tall Buildings) *'the proposal does not raise concern in regard to its impacts (outlined under Policy D9(Part C))'*.
- 8.16 The GLA note that the part retention and upward extension of the existing building is informed by a contextual design response to the site. The base, middle and top of the proposal is clearly articulated and responds successfully to the established and emerging character of the area.
- 8.17 The submitted townscape views indicate that the form and massing of the proposals would be consistent with the scale of recent development, including the JJ Mack Building opposite. This successfully marks the building's prominence on the junction.



3D image indicating how the proposed development would relate to the height of the development at JJ Mack Building – 33 Charterhouse Street

- 8.18 The effects on the heritage of the area, i.e. setting of neighbouring Listed buildings and character and appearance of the Conservation Area in the context of the proposed ‘tall building’ are considered in ‘Heritage’ below.
- 8.19 The ‘other’ criteria referenced in the tall buildings policies (e.g. amenity, energy, sustainability, biodiversity etc) are all considered elsewhere within this report, i.e. in the sections on Sustainability & Energy, Effect on Amenity of Neighbouring Occupiers and Landscaping and Biodiversity. The proposal accords with the policies and criteria relating to tall buildings in the London Plan, the Local Plan and Draft Local Plan.

FURTHER URBAN DESIGN COMMENTS

Existing building:

- 8.20 The existing building is austere and fortress like, with no relationship to the street, reflective of its original use as part of the De Beers diamond campus, where security was imperative. The building façade is performing poorly

thermally; the high window cill levels restrict daylight into the floorplate and the core arrangement break up the floorplate and create inefficiencies. The proposal looks to retain the buildings superstructure, foundations and retaining walls, whilst rearranging the core and replacing the entire façade.

- 8.21 There is an opportunity for a high-quality scheme that acts as a characteristic gateway into Camden and Hatton Garden, with a generous and open relationship to Charterhouse Street and Farringdon Road, as well as an improved connection and frontage to the historic Saffron Hill.
- 8.22 The area is undergoing change with the arrival of the Elizabeth Line in Farringdon providing further connectivity and investment to the area and in future, and the arrival of cultural infrastructure adjacent to site - the Museum of London – arriving to the old Smithfield Market as part of the City of London's Culture Mile vision, bringing a new audience to the area. There is an opportunity for a new building to contribute to the life of this grey intersection of London. The proposal seeks to create a mixed-use building, with offices on upper floors, market hall, retail and workshop uses on lower floors.
- 8.23 Whilst some of the medieval street patterns remain (Saffron Hill / Bleeding Heart Yard) most is lost due to clearances, with plots amalgamated to form the now large office buildings that occupy sites onto Farringdon Road; plot sizes are smaller and still maintain their 19th century characteristics. The Farringdon Street intersection with Charterhouse Street is characterised and lined with mixed-use office buildings which have strong vertical articulation, large amounts of fenestration and top-heavy massing, including the JJ Mack building which dominates the east side of the street. A varied contextual setting provides an opportunity for development of a building with taller massing that re-establishes a key historic route.

Design concept

- 8.24 The design responds to the varied history and infrastructure of the site such as the Fleet River and the subsequent layers of physical built infrastructure during the Victorian era for a growing city – the Holborn Viaduct, Smithfield Market and Farringdon station – which often employed the use of arches to add texture and detail to these large objects.
- 8.25 The design responds with a layered design composition around a base, middle and top. The base is robust and earthy, reflecting the substrata beneath that holds the Fleet and uses triple storey arches to reflect the use of arches and bays within the infrastructural historical fabric. The base acts as a key piece of creative space, or “marketplace”, with the introduction of affordable jewellery workspace in the lower ground floor that fronts onto Saffron Hill, and class E retail/restaurant use to the south of the ground floor plan, which build on the current and future cultural infrastructure of the area.

The middle responds to the need for best-in-class office space, large floor plates and good natural daylight, whilst the top creates shared green cloister gardens that respond to the hidden pockets of green space often discovered in the city, including the historic Ely Palace grounds, of which a remnant of greenery remains.

- 8.26 The building is seen especially prominently from the City of London, on Farringdon Street beyond Holborn Viaduct looking south, and signifies the beginning of Camden. The design proposes to create visual intrigue by exaggerating the south-eastern corner and proposing planting that will green the skyline.
- 8.27 The proposal retrofits and extends a building purposed to hide things away and brings it back into the public consciousness by greatly improving its external appearance with high quality cladding systems that speak to the Hatton Garden conservation area.

Ground floor

- 8.28 The proposed ground floor plan has openings and frontages which are less defensive, creating space for various activity. Where the ground floor previously abutted the street edge to Charterhouse Street at a right angle, the new proposal, carves out a covered portico to this frontage, giving back to the public realm and create spill out space for the use class E occupier and permeable space to move through and find shade. To the building corner, the defensive turret is removed and a concave space created with integrated benching allowing people to perch here and enjoy sunshine to this south facing front. This proposed plan, creates greater engagement with the street so that the public can interact with the building, complementing the Museum of London, by creating an inviting and active frontage. Gates are proposed to enclose this public space. A condition relating to the opening and closing of the gates is attached in the interests of safeguarding public access and use while protecting the amenity and security of the space. The main entrance for the proposed retail / restaurant uses is on the east onto Farringdon Road; because of the level changes across the site, a new ramp and stair are proposed here, allowing for parity of access. Adjacent is the main office entrance, which also cuts inwards from the plot boundary to carve out a double height lobby space and create a more generous entrance experience. Further along Farringdon Road there is the entrance to the core where you can take a bicycle down to the basement area and an affordable jewellery workspace, with its own separate entrance, establishing a hierarchy amongst entrances along Saffron Hill.

Lower ground floor

- 8.29 This floor is made up of ancillary space including bicycle storage, toilets, changing rooms, bin storage, plant and two affordable jewellery workspaces

and occupies the entire building plot. Saffron Hill is accessed via steps from Charterhouse Street and is the main access point for the affordable jewellery workspaces, and a secondary entrance to the office space, bringing the historic Saffron Hill back into the public domain, re-establishing it as an important route, with permeable frontages and doors that open to the public, and glazing that allows views of the jewellery workshops. This previously fortified frontage will transform into an active frontage, with a street with activity.

Mass/bulk

- 8.30 In comparison to the top-heavy massing featured on the JJ Mack building, this building cuts away at the massing sensitively, with terraces on all the additional flooring, allowing for moments of serenity, views and greenery. The massing from all angles cuts to create views that are characteristic of densely populated areas in London, i.e. views that create layers of building that form urban collages of material, shape, texture and scale. These cuts also work to create cloister gardens, and work to respect existing datums, for example, the south-east corner steps down to create some distance between 17 & 19 Charterhouse, and to retain important views.
- 8.31 A key design move that is visualised in the massing is the lantern on the south-eastern corner of the site, both to echo the former turret structure and to act as a gateway into Camden, marking the skyline to create a strong corner presence. On approach from the west the lantern is visible along with the cascading massing of the proposal to the south; it is also viewed clearly from outside the borough boundary on the east (Islington) and south (City of London) approaches. The lantern feature relates to the cupolas and pediment features that appear on the old Smithfield's Market site and the old Port of London Authority building, punctuating the skyline, creating variation in roofscape.
- 8.32 The additional proposed levels remain within the footprint of the long thin, double curved building. Additional massing through the addition of balconies to the northern end of Saffron Hill, mirror the existing balconies that project to the south of the site, creating opportunity for amenity.
- 8.33 View from Farringdon Road looking south: The new building is seen behind the turret of 25-27, however it remains prominent and visible. In views further down Farringdon Road, the tower of the listed building will continue to be appreciated against open sky.

Appearance, detailing and materials

- 8.34 The architectural language is simple and effective with the three-tier arrangement that both reflects the appearance of many historic buildings in the area such as 103-111 Farringdon Road. and the historic arrangement in

Hatton Garden described previously of workshops to basements, ground floor shops and living on upper levels. This proposal emphasises this 3-tiered arrangement by graduating the colours from dark to light as the building continues upwards. Furthermore, the form of the building follows the sweep of Saffron Hill, that is a remnant of the River Fleet.

- 8.35 The base is formed of double / triple storey arches creating a consistent horizontal datum that help to unify the elevations as the levels change from Saffron Hill to Farringdon Road base grounds itself by creating a sturdy, heavily textured concrete / stone base with a darker polished 'tide line' that helps with durability. Arches are found throughout the area, especially in infrastructural built form such as the Holborn Viaduct, to the railway arches at Farringdon station, to Smithfield Central market site as well as stylistic uses e.g. 25-27 Farringdon Road. Embracing arches in the use of bays provide rhythm to the elevations and contextual character. Furthermore, the base to Saffron Hill references saffron spice and the history through using a deeper red iron-like material. On south and east elevations, circular columns are utilised to characterise building entrances and public space.
- 8.36 The middle five storeys are consistent in form and visual appearance, with a light roach Portland stone proposed to clad the existing frame and cladding system made up of a bronze-coloured alloy. Verticality is expressed by columns that sit proud of the spandrels, that have a slight curve in them to reveal the curve of the street and again references the Fleet River.
- 8.37 The top storeys as well as the lantern and south-eastern turret feature, are lighter in colour, using a lightweight profiled GRC material to give texture and decoration, reflecting on highly decorative facades found in the conservation area. The plant is on level 9 and is concealed through a continuation of the pleated GRC found on the upper levels, and matching the proposed opening sizes on this level, though disguising activity through screening to match the exiting bronze colours glazing system. This way the plant is configured into the architectural design. The layering of massing, detail, texture, and materiality all speak to the interesting history of the site, which has layers of infrastructure, from the river to the road and bridges created to culvert it, rail, market and garden infrastructure; the building design builds on these ideas and histories to create a contextual architecture, adding to the character of the area in a way the existing building does not.
- 8.38 Amenity space is provided throughout the new floorplate. These include the existing south-west link bridges, which will be opened to provide amenity and new north-west balconies. From level 7 the floorplate begins to cut away to provide pockets of green spaces, some of which continue for 2 levels and others for one only, these appear on all sides of the building, creating opportunities for different planting approaches to each, due to different light / wind qualities.

- 8.39 The largest green space is on the roof at level 10 followed by amenity to the south-west, large enough to be able to host events and has spectacular views towards the south and St. Pauls.
- 8.40 This integrated, winding, terraced greenery is a key aspect of this project, drawing from the historic gardens of the Ely Palace, creating spaces for recreation, wellbeing and collaboration. Several trees are proposed in key locations, and the types of green spaces include contemplative 'cloister gardens', a lively and engaging 'ornamental garden' and a 'productive garden' with edible species and space for more seating and space for group activities.
- 8.41 The retention of the architect (DSDHA) involved with the pre-application and the preparation and submission of the application is to be secured within the S106 agreement. This is in the interests of implementing the planning permission expediently in accordance with the approved conditions and S106 obligations, in the proper interests of planning.

HERITAGE:

The Planning (Listed Building and Conservation Area) Act 1990

- 8.42 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 8.43 Section 72 of the Act contains similar requirements with respect to buildings or land in a conservation area. In this context, "preserving", means causing no harm.
- 8.44 The effect of these sections of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of Listed Buildings and their settings. Considerable importance and weight must be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption.

The National Planning Policy Framework 2024 (NPPF)

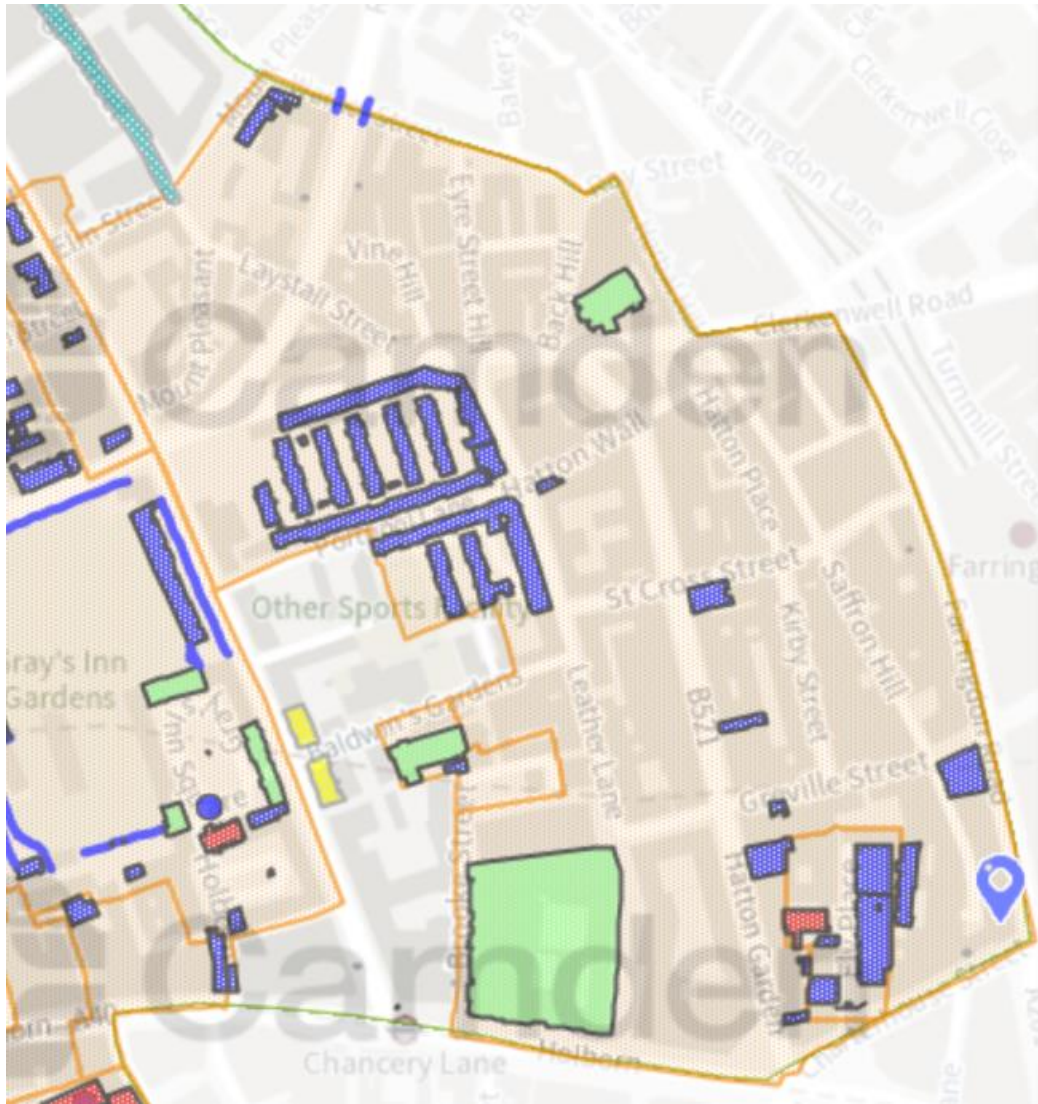
- 8.45 The NPPF requires its own exercise to be undertaken as set out in chapter 16 (Conserving and enhancing the historic environment).
- 8.46 Paragraphs 207-216 require consideration as to the impact of a proposed development on the significance of both designated heritage assets and non-designated heritage assets, including an assessment and identification of

any harm/the degree of harm. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (paragraphs 212 to 215).

- 8.47 Paragraph 215 states: 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'
- 8.48 London Plan policy D4, policy D1 of the Local Plan and CPG (Design) seek to secure high quality design. Policy D1 seeks high quality design in all development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrate well with the surrounding streets and townscape, comprise high quality architecture, and be accessible for all. Policy D2 is also relevant given the site's location in the Hatton Garden Conservation Area and near to listed buildings. It requires development to preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 8.49 The principal conservation issues are as follows:
- Character and appearance of Hatton Garden Conservation Area
 - Setting of listed buildings

Significance of heritage assets

- 8.50 The site is located within the Hatton Garden conservation area and within the setting of a variety of listed buildings but specifically nos. 25-27 Farringdon Road, immediately to the north (Grade II) and St Ethelreda's Church, 70m to the west (Grade I). The site also abuts the Smithfield Conservation Area located in the City of London, although the opposite side of Farringdon Road from the application site is fronted entirely by tall modern office buildings and therefore the setting of this conservation area won't be affected by the proposed development.



*Map of Hatton Garden Conservation Area (orange line) and neighbouring statutorily listed buildings: red – Grade I, blue – Grade II, green – Grade II**

- 8.51 The site lies within sub area five of the Hatton Garden conservation area which 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. 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.
- 8.52 Nos. 25-27 Farringdon Road is grade II listed and is located immediately to the north of the site. The listed building has architectural interest as a good example of the Venetian Gothic style prevalent in the Victorian era. The building is notable for its high-quality materials and design, in particular the polychromatic brickwork, which combines yellow, red, and black bricks with

stone facings on the ground floor. The six-storey façade is organised into eight bays along Farringdon Road and seven bays along Greville Street, with a distinctive rounded corner bay with turret facing the important intersection of these streets. A prominent feature is the tall brick Gothic arcade that spans the first three floors, incorporating slightly recessed windows and intricate stone tracery. The use of slender iron column mullions and decorative stone heads further contributes to the buildings' rich architectural detailing



Figure 3.6: Nos. 25 and 27 Farringdon Road (Grade II Listed Building)

- 8.53 The Roman Catholic Church of St Etheldreda was added to the statutory list of buildings of special architectural and historic interest as Grade I on 24 October 1951, with no subsequent amendments. It is approximately 70m to the west of the site and separated from the site by existing buildings on Ely Place and Saffron Hill.
- 8.54 St. Andrew's House, which is located on the other side of 17 Charterhouse Street from the site, is Grade II Listed. It is concealed from Saffron Hill by 17 Charterhouse Street with only a pair of metal gates and private service road allowing glimpses within the public domain. Its historic and architectural features and setting would not be affected by the proposals.
- 8.55 The application site is located on the corner of Charterhouse Street and Farringdon Road and frames the southern access to Saffron Hill. The site was historically occupied by buildings with small plots. However these buildings were damaged during the blitz of the second world war. The current building was constructed during the latter part of the 20th century.

- 8.56 The long elevation of the building faces Farringdon Road and the shorter elevation faces Charterhouse Street. The building sits over six storeys with a large basement and additional rooftop plant. There is a link structure from first floor upwards spanning the width of Saffron Hill and joining the building with 17 Charterhouse Street. The building is faced with Portland stone, granite, and bronzed anodized aluminium panels.



Figure 4.1: No. 19 Charterhouse Street seen from the junction of Charterhouse Street and Farringdon Road

- 8.57 Recent development in the area includes the refurbishment and repair of the former Western Buildings of Smithfield Market, presently under construction, together with conversion of the 1960s former Poultry Market building, all due to open as the London Museum later in 2025. A large extension was also added to the east of Farringdon Station to accommodate the Elizabeth Line, and the JJ Mack building, directly opposite the site, was completed in 2022, intended as a benchmark for future sustainable office schemes.

Representative Viewpoint 6 – Charterhouse Street



Figure 7.11: Representative Viewpoint 6 – Existing



Figure 7.12: Representative Viewpoint 6 – Proposed

View from Charterhouse Street (east) including recent developments - JJ Mack building (right) and refurbishment of former Smithfield market buildings (left)

Assessment of effects of proposals on significance of heritage assets

- 8.58 The development proposals which would manifest in the Conservation Area and on the setting of neighbouring Listed buildings are as follows:
1. Removal of existing 6th storey level plant and formation of 6th, 7th, 8th, 9th floors and tenth floor pavilion with incrementally increasing setbacks
 2. Formation of 'double height' arches/with columns at ground floor level (all elevations) with retail/restaurant unit (south) affordable jewellery units, service bays and back-door entrance (Saffron Hill) and office (Farringdon Road).
 3. The existing façade (ground to 5th floor) will be removed and replaced with a more energy efficient, contextually appropriate and contemporary design.
- 8.59 The effects of the proposals on the significance of the heritage assets are now considered in turn:
- 1. Removal of existing 6th storey level plant and formation of 6th, 7th, 8th, 9th floors and tenth floor pavilion with incrementally increasing setbacks**
- 8.60 The development creates an additional four storeys on top of the building which equates to an additional 12 metres height when including the existing plant. The massing is distributed across the existing roof top and is set back in parts creating a sculptured roof form. This helps to reduce the impact of the increased massing and a rooftop 'lantern' feature adds further architectural interest.
- 8.61 The increased height is not out of place within the context of the scale and appearance of the part of the Conservation Area within which the site lies and the form, magnitude and dynamics of the neighbouring listed buildings.
- 8.62 Figures 7.2 and 7.3 (below) from viewpoint 2 (Holborn Viaduct to the south) indicate how the scale of development would be appropriate for the location in the Conservation Area, given the height and massing of neighbouring buildings on both sides of Farringdon Road and the spacing and character of the Farringdon Road streetscape.

Representative Viewpoint 2 – Holborn Viaduct



Figure 7.3: Representative Viewpoint 2 – Existing



Figure 7.4: Representative Viewpoint 2 – Proposed

- 8.63 The upper floor setbacks (on all sides) which would increase incrementally higher up the building would alleviate the mass and bulk of the upper floors. Marking the corner of Camden, with Farringdon Road now characterised by contemporary office complexes, the scale and form of the building would be in keeping with this part of the Conservation Area.

- 8.64 When viewed from Holborn Circus to the west (viewpoint 3) the staggered additional storeys, alleviated with light materials and contrasting shapes and landscaping would add interest to the composition of the streetscene and result in less than substantial harm to the character and appearance of the Conservation Area.

Representative Viewpoint 3 – Holborn Circus



Figure 7.5: Representative Viewpoint 3 – Existing



Figure 7.6: Representative Viewpoint 3 – Proposed

- 8.65 In relation to the listed building to the north (25-27 Farringdon Road) the buildings adjacent to the site are lower here and the increase in height would be more clearly apparent in views from the north looking down Farringdon Road with No. 25-27 in the foreground. The proposed massing has sought

to ameliorate the impact of this by setting back the new upper floors such that the setting and townscape merits of this building in the streetscene would be largely respected.

Representative Viewpoint 5 – Farringdon Road



Figure 7.9: Representative Viewpoint 5 – Existing



Figure 7.10: Representative Viewpoint 5 – Proposed



View of proposed roof-scape from Farrington Road north

- 8.66 As can be seen from the above image (proposed viewpoint 11 from the applicant's Heritage Townscape and Visual Statement) the distinctive Gothic features of the Listed building at 25-27 Farrington Road would be seen at the forefront of the block and the stature of the building and the prominence of its architectural features would not be compromised when seen at closer range from the public domain. The setting of the building in this view would not be harmed. However, in the preceding images (viewpoint 5 existing and proposed) the siting and form of the proposed development would be such that it would be seen to rise above the neighbouring building more abruptly in this long range view and largely engulf the silhouette of the turret feature of 25-27 reducing its pre-eminence in the streetscene. This is considered to harm its setting by detracting from its visual significance and the ability to appreciate its gothic building profile from afar. The scale of harm in this view would quickly diminish on approaching the listed building and therefore the level of harm to its setting and appearance is considered 'less than substantial'.
- 8.67 In relation to the St Ethelreda's Church, situated midway along Ely Place approximately 70m to the west, the proposed development is not considered to harm the significance or setting of the Grade I Listed building. The church cannot be seen from Charterhouse Street and the proposed development

would not diminish from its setting or significance within Ely Place. No harm would result to its heritage value.

8.68 The upper floors follow the theme of the current building with a very clear grid of windows. The stark modern approach is in contrast to some of the older more traditional neighbouring buildings but is not considered to introduce new harm to any heritage assets and must be seen in the context of the variety of building styles and periods that have evolved during the various periods of change which continue to affect this conservation area and its surroundings.

8.69 The proposed material palette consists of rough textured concrete, polished concrete, precast concrete and bronzed aluminium windows. The palette is fairly simple with complementary tones and a variety of light textures. The ground floor is of a darker textured concrete creating a sturdy base with the tones becoming lighter as the building climbs higher. This all creates a reasonable level of aestheticism.

2. Formation of 'double height' arches/with columns at ground floor level (all elevations) with retail/restaurant unit (south) affordable jewellery units, service bays and back-door entrance (Saffron Hill) and office (Farringdon Road).

8.70 The ground floor is activated by having a large entrance to Farringdon Road and another to Charterhouse Street. The corner plot is earmarked for restaurant/retail use with a unit to the northern end of the building used as a jewellery workspace. This will energize the ground floor whilst also reinforcing the character of the area as a jewellery making quarter.

8.71 Within the scheme it is proposed to improve the entrance to Saffron Hill. This is achieved by creating a better stairway on to the street and replacing the existing structure linking nos. 17 and 19 Charterhouse Street.

8.72 The proposed stairs have an improved materiality and will generally be more welcoming. The demolition of the existing link structure is supported. The proposed link with new landscaping would not harm the appearance of the Conservation Area:

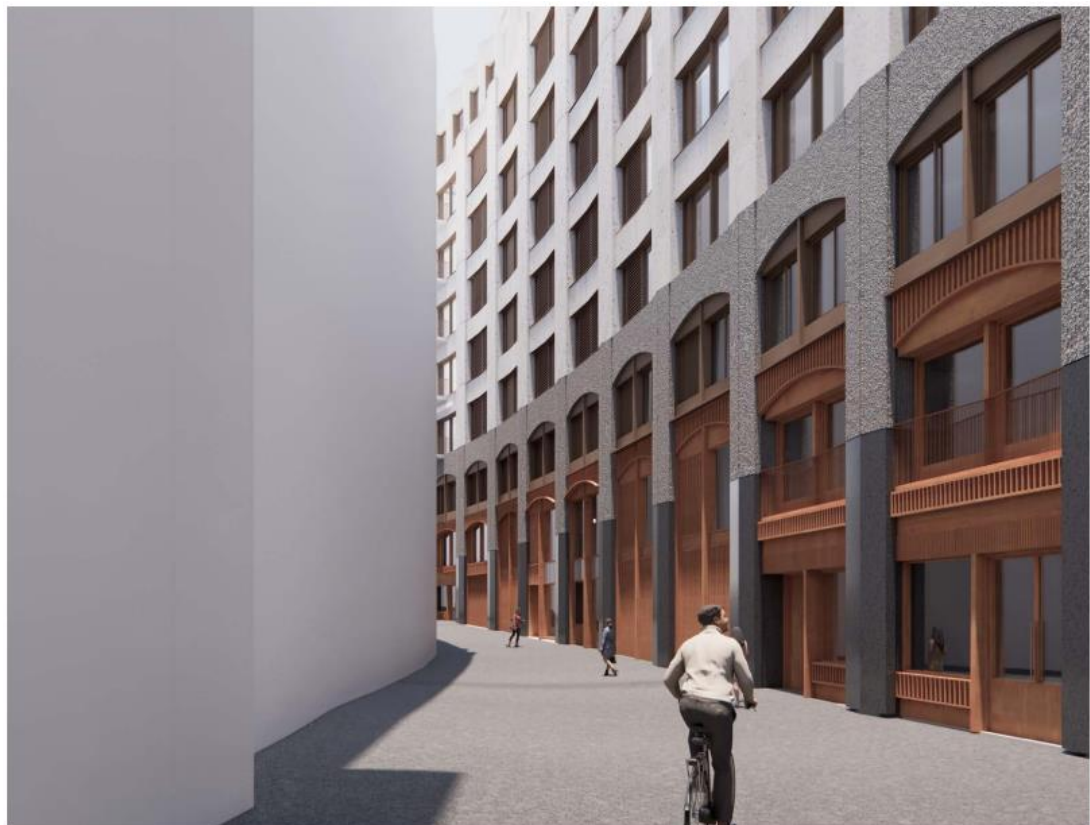


Charterhouse Street elevation (including link to 17 Charterhouse Street)

- 8.73 The elevation onto Saffron Hill which includes two storey metal arches at ground and first floor level creates a much improved appearance. The sequence of arched units along Saffron Hill hints at the former trading character of Saffron Hill and preserves the character of this part of the Conservation Area.



Approach down Saffron Hill (image courtesy of Miller Hare)



Approaching up Saffron Hill with Lower Ground floor entrance on right

3. The existing façade (ground to 5th floor) will be removed and replaced with a more energy efficient, contextually appropriate and contemporary design.

- 8.74 The façade design and materiality are rooted in the heritage of Saffron Hill. At the same time, the proposed materials are differentiated, with more robust, ‘workshop’ textures, colours and shades at the base and lighter, softer contemporary styles at the top. The architectural design, set-back, landscaped upper floors and roof-top lantern feature will result in an animated building which will complement the evolving nature of this part of the Conservation Area. The form, design and architectural design of the building will respect the commercial heritage of the area and will preserve the setting and significance of the relevant heritage assets.

Conclusion on effects on character and appearance of Hatton Garden Conservation Area and setting of neighbouring Listed buildings

- 8.75 The form, siting, design and treatment of the scheme has been undertaken to address the relevant heritage assets.
- 8.76 The GLA, in their Part One response, indicate that the development would cause ‘less than substantial harm to heritage assets, namely, the Grade II Listed building at 25 – 27 Farringdon Road and the Hatton Garden Conservation Area.
- 8.77 As noted in para 215, the NPPF directs: ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal’.
- 8.78 The proposal would encompass several public benefits, such as new and improved employment floorspace meeting current standards, new retail/restaurant facilities, affordable jewellery workspace, improved permeability, legibility and urban design. Given the nature of the proposal and level of public benefits, on balance, it would not cause ‘over-riding’ harm to any heritage assets and it would comply with the policy for conserving the historic environment in the NPPF and the London Plan and LB Camden policies for heritage. Considerable importance and weight have been attached to the harm caused to the setting of the listed building in reaching this conclusion.

9. NEIGHBOURING OCCUPIERS AMENITY

- 9.1 Local Plan policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area,

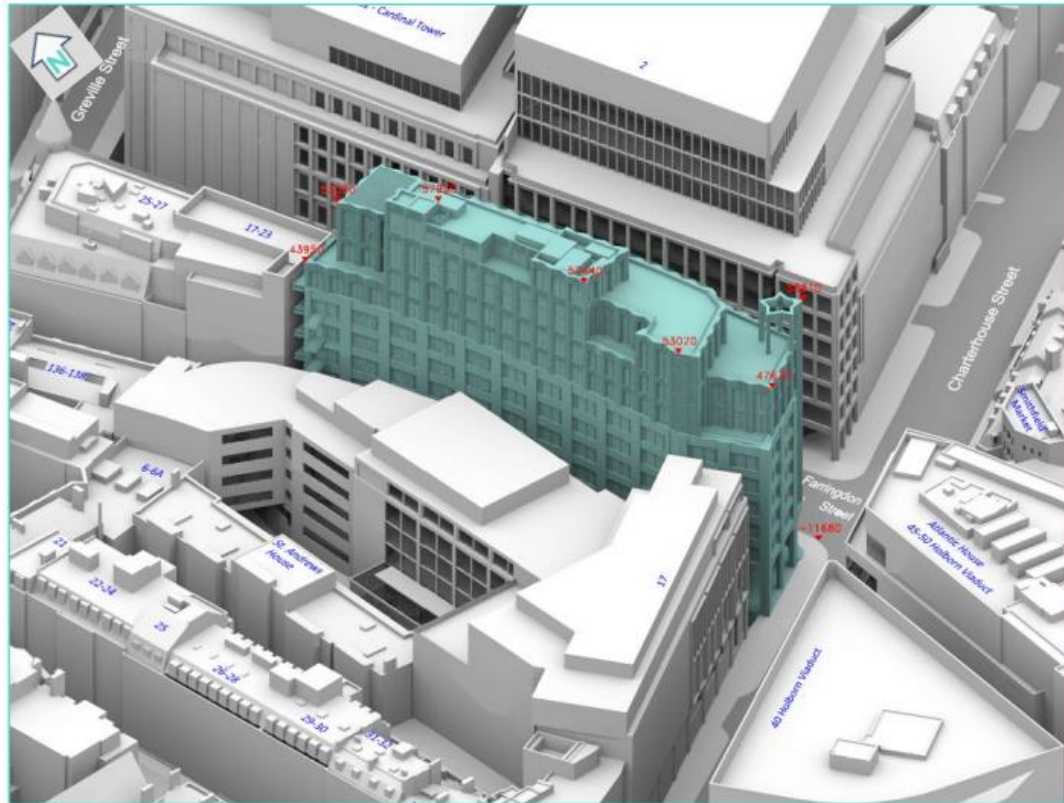
requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impacts from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

Daylight and sunlight

- 9.2 A Daylight & Sunlight Report has been submitted as part of the application which details any impacts upon neighbouring properties.
- 9.3 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.
- 9.4 Paragraph 130 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.

Assessment

- 9.5 Below is an image of the proposed scheme taken from the applicant's submitted sunlight and daylight report:



St Andrew's House:

- 9.7 At St. Andrew's House 56 windows in 36 rooms were required to be assessed. When the Vertical Sky Component (VSC) method is considered, the results show that 41 out of 56 windows tested will fully comply with the BRE guidelines. Out of 15 windows that will fall short of their recommended targets, 1 will do so only marginally. The remaining windows will experience a loss between 34.23% and 60%. While the BRE suggests 27% VSC as an adequate level of VSC, in an urban environment, typically, levels between 15%-18% are found acceptable. In the St Andrew's House case, all but 2 windows already benefit from VSC levels below that, between 0.05% and 14.1%, as they are heavily compromised by existing walkways/overhangs above. While they experience a disproportionately large percentage loss, this is because the baseline values are already very low so only a small absolute loss of VSC will amount to large decrease in percentage terms. The actual loss is marginal and unlikely to be perceptible. Furthermore, it is noted that the BRE guidelines state: "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 large relative impact on the VSC." When a further assessment is undertaken, it shows that all windows will remain fully BRE compliant should the effect of the balconies/walkways be removed.
- 9.8 When the (No Sky Line) NSL method is considered, 25 out of 36 rooms tested will fully comply with the BRE guidelines. Three rooms will fall short of their recommended targets only marginally. The remaining 8 rooms will experience a loss of between 31.9% and 48.9%. All of these rooms are compromised by the overhanging walkways and in most cases, they have very low existing values, which contribute to disproportionately large percentage loss. The Assessment also advises that the affected rooms, in the northern section of the building, will experience similar No Sky Line conditions as the rooms in the southern section of the building as a result of the development.
- 9.9 In relation to sunlight, 34 out of 36 rooms tested will fully comply with the BRE guidelines. The 2 rooms that will fall short will not see any change in winter sunlight but annually, they will have their (Annual Probable Sunlight Hours) APSH reduced beyond the BRE guidelines (40% and 41.2%). Again, these rooms are compromised by the overhangs above which cut out the top part of the sky. The results of the secondary APSH assessment, where the effect of balconies is removed as suggested by the BRE guidelines, show that all windows/rooms will remain fully BRE compliant should the effect of the balconies/overhangs be removed.

17 – 23 Farringdon Road

- 9.10 At 17 – 23 Farringdon Road when the VSC method is considered, the results show that 14 out of 15 windows tested will fully comply with the BRE guidelines. The 1 window that will fall short of its recommended target values, will do so only fractionally (22.25%) and this is on the top floor located closest to the proposals. It will still maintain a VSC of 22.25% post development, which is considered a very good level in an urban environment.
- 9.11 When the NSL method is considered, all 15 rooms tested will fully comply with the BRE guidelines, experiencing only negligible changes in their NSL. This demonstrates that the property will continue to enjoy very good daylight levels post-development despite 1 isolated VSC transgression.
- 9.12 No rooms at 17-23 Farringdon Road have windows with an aspect of the development site and facing within 90 degrees of due south, hence no rooms qualify for the sunlight test.
- 9.13 The letter which was received on behalf of 17 – 23 Farringdon Road questions why the top three floors of the building only were included in the assessment. The 3D images included in the Assessment indicate that the windows below these levels do not sit behind no. 19 Charterhouse Street; they sit level with the application building. As such, the proposed additional storeys at the application site would not sit forward of or result in any additional loss of light to the 'lower floor' windows.
- 9.14 The letter which was received on behalf of 17 – 23 Farringdon Road also questions whether The neighbouring developments in the surrounding area were taken into consideration in the assessment of daylight and sunlight effects. The Assessment confirms : 'To calculate the various measures of daylight and sunlight, it is necessary to construct a three-dimensional computer model. The 3D model was created to reproduce the massing of the buildings both on and surrounding the application site.'
- 9.15 The letter which was received on behalf of 17 – 23 Farringdon Road questions the means by which sunlight and daylight effects were assessed. The Assessment was undertaken with reference to the guidelines set out in the 2022 Building Research Establishment ("BRE") Report 'Site layout planning for daylight and sunlight - A guide to good practice' (the "BRE Guidelines"). The Assessment was undertaken in accordance with the industry approved methodology applying two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component ("VSC") and No Sky Line ("NSL") and in relation to sunlight, Annual Probable Sunlight Hours (APSH). As such, it provides a satisfactory measure of the effects on daylight and sunlight effects at neighbouring properties.

Bleeding Heart Yard:

- 9.16 In response to comments submitted on behalf of owners/occupiers of buildings in Bleeding Heart Yard and Greville Street, the Daylight & Sunlight analysis was extended to these properties.
- 9.17 In terms of Vertical Sky Component, all windows tested will fully comply with the BRE guidelines. In terms of No Sky Line, all 3 rooms tested will fully comply with the BRE guidelines with no loss recorded. In terms of Annual Probable Sunlight Hours, both qualifying rooms tested will fully comply with the BRE guidelines and they will retain sunlight hours in excess of the suggested targets.
- 9.18 In terms of overshadowing to amenities, both terraces will remain fully compliant with no loss recorded post-development and retaining 56% and 98% of area adequately sunlit on March 21st.
- 9.19 It is concluded that overall, 7 Bleeding Heart Yard will experience no noticeable loss of daylight or sunlight and will continue to enjoy its very good level of natural light post-development.
- 9.20 1 Bleeding Heart Yard and 19 Grenville Street are located too far away, and not in the direct view of the proposed development, to experience any material impact in terms of daylight or sunlight.

Conclusion on effects on sunlight and daylight

- 9.21 The Sunlight & Daylight Assessment which was undertaken demonstrates compliance with BRE guidelines at the neighbouring sites. Where measured sunlight and daylight conditions are below recommended BRE guidelines at the potentially affected neighbouring dwellings it is primarily as a result of existing balconies/overhangs. For those rooms which are not already overshadowed by existing balconies and overhangs the submitted Sunlight & Daylight Assessment indicates that the proposed development would not result in any significant loss of sunlight or daylight. As such, the proposed development would not result in any significant deterioration in sunlight or daylight at any neighbouring residential sites.

Outlook

- 9.22 The Sunlight & Daylight Assessment has identified residential properties within the immediate vicinity of the site. The letters of objection which have been received also cite adverse impacts on residential amenity from the proposals.
- 9.23 It is not considered that there are any immediately neighbouring residential properties to the north which have windows facing the site. 17-23 Farringdon

Road to the north, has windows facing to the west (Saffron Hill) and east (Farringdon Road) and not to the site (south).

- 9.24 St. Andrew's House is approximately 35m to the west. The upper storey of the proposed building would be visible from some of the east facing windows in St Andrew's House but not to the extent that there would be an undue loss of outlook.
- 9.25 Gamage's Estate, also to the west is over 150m from the application site. At this distance, the new storeys on the building would not be unduly overbearing or result in an unacceptable sense of enclosure. It should be noted that there is no 'right' to a private view and that while townscape and visual effects must be considered in public terms, it is not possible for an individual to lay claim to an individually protected private view.

Noise / Disturbance

- 9.26 An acoustic assessment has been carried out to support the planning application for the proposed development at 19 Charterhouse Street, London.
- 9.27 The proposed development includes the installation of internal and external building services systems to provide heating, cooling and ventilation. The primary plant location and noise generating area of the development will be the external plant area at roof level (level 09 and level 09 mezzanine). The primary mechanical services plant proposed as part of the development is as follows:
- 19 no. Mitsubishi PURY-M250 condenser units, to be located at level 09 mezzanine
 - 1 no. 200 kVA life-safety generator to be located at level 09.
- 9.28 A Plant Noise Assessment has been submitted. Appropriate noise guidelines have been followed. The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 9.29 The assessment indicates that the proposed mechanical plant installation should be capable of achieving the Camden's environmental noise criteria at the nearest and potentially most affected noise sensitive receptors with suggested noise mitigation.
- 9.30 The Council's Environmental Health Team is satisfied that, subject to conditions to control noise and vibration levels, the submitted acoustic submission and associated technical details meet Local Plan guidelines and

are therefore acceptable in environmental health terms. The recommended noise control and anti-vibration conditions are attached accordingly.

- 9.31 The proposed floorspace/uses would not result in undue noise or disturbance harmful to the amenity of neighbouring occupiers. Situated within the Central Area, with other town centre, and particularly food and drink uses nearby, the proposed offices, retail/restaurant and jewellery workspace would not introduce unacceptable new noise. The external terraces at 7th, 8th, 9th and 10th floor level are for users of the building. It is considered reasonable to attach a condition to only allow the use of these terraces between the hours of 08:00 and 19:00 from Mondays to Fridays and not at all on Saturdays, Sundays or Bank Holidays. The condition will also prevent any external amplified sound from being transmitted/ broadcast (in the interests of the character and amenity of the area).

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 The Development Plan promotes circular economy principles and Local Plan policy CC1 and London Plan policy SI 7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building and to optimise resource efficiency.
- 10.4 In this case, the existing building is being partially retained. The works include removal of the existing (partial) 6th floor, internal walls, stairs and lifts to form open plan offices with new stair core and lifts and also changes to the floor slabs, removal and replacement of the façade, the addition of 3 new storeys and additional roof pavilion and terraces. Therefore, as only 42% of the materials are being retained according to the Detailed Circular Economy Statement, it is considered that the proposal entails substantial demolition. As such a Condition and Feasibility study was required to assess the condition of the existing building and explore options for the future potential of the site. This considered the existing building, refitting, refurbishing, substantial refurbish and extension (proposed scheme) and reclaim and recycle (new build). The Condition and Feasibility study showed that whilst the existing concrete structure is understood to be in a relatively

good condition with decent floor to ceiling heights, the façade performance is poor both in terms of energy efficiency and daylighting, the three cores obstruct plans for good quality flexible office space and whilst this could be improved by the removal of the central core the office space would still fall short of contemporary office standards.

- 10.5 A meeting has been held between the applicant, the GLA and the Council's Planning and Sustainability teams and the applicant has elaborated on the justification for the scale of the proposed demolition in building terms. The applicant has stated *"It was recognised during the early stages of design, that existing cores needed to be enhanced/replaced to ensure a robust compliant building in terms of fire access and egress along with occupancy numbers generally. In addition, the existing three core arrangement breaks up the floorplate, reducing efficiency, functionality and limiting opportunities for a flexible well serviced, healthy interior for occupants. As the three cores were spread out across the long floorplate, this presented a considerable challenge in terms of the amount of retention possible, but which the team believe has been maximised within the constraints. Therefore, the biggest challenge to realising this retention scheme has been replacing the existing three out of date and non-compliant cores with a single Building Regulations compliant core on the west side which unlocks the retained structure's full potential. Approximately 58% of the concrete slab and superstructure is retained as well as 100% of the below ground concrete piles. The team have worked and reworked a long slender single core to limit the amount of demolition to the central spine beam and to avoid complex new structure over the existing subterranean mail tunnel. The new core seeks to mitigate the demolition required by working hard to stiffen the retained and new floors in as efficient a manner as possible, limiting the need for any significant additional bracing structure to the existing frame or new frame above. Further, by terminating the main passenger lifts at ground level, the team have almost totally avoided the need to demolish any of the lower ground floor slab or basement for lift pits. The team have worked with full focus to safeguard the maximum amount of retained structure, developing a strategy which accommodates temporary propping of some existing structure between demolition and construction. This ensures that even when some vertical structure has been necessary to demolish, the beam/slab is still retained primarily for the carbon value this holds, but also for the inherent character this will add to the finished scheme."*
- 10.6 Further to the meeting, the GLA (and the Council's Planning Team) agree the scale of demolition in the context of the constraints of the existing building is justified in this case in terms of providing new employment space in accordance with current building efficiency standards. A condition to secure post-construction Circular Economy and Whole Life Carbon monitoring is attached. Further to the meeting, the GLA (and the Council's Planning Team) agree the scale of demolition in the context of the constraints of the

existing building is justified in this case in terms of providing new employment space in accordance with current building efficiency standards. A condition to secure post-construction Circular Economy and Whole Life Carbon monitoring is attached. The London Plan Policy SI 7 looks to reduce waste and support the circular economy by keeping products and materials at their highest use for as long as possible. To ensure greater resource efficiency through recycling and reuse of materials, 95% of construction and demolition waste should be reused, recycled, or recovered, and 95% of excavation waste put to beneficial use. In this case there is no excavation waste and it is expected that 95% of overall demolition and construction waste will be diverted from landfill with opportunities for 4% to be reused and 54% to be recycled offsite. In addition, the proposals aim to meet the requirement for a minimum of 20% of the total value of materials to be derived from recycled and reused content. A condition is attached to secure this (Condition 13).

Whole Life Carbon

- 10.7 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.
- 10.8 The retention of existing buildings can potentially help to reduce the amount of upfront embodied carbon of a development. Larger buildings will usually have a larger total carbon impact due to their greater floor area but to enable comparison Whole Life Carbon is assessed as tonnes of carbon equivalent per m² of floorspace provided and assessed against GLA guidance benchmarks and aspirational benchmarks for different building typologies. However, any development including refurbishment is likely to lead to carbon emissions.
- 10.9 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). This is also known as upfront embodied carbon.
- 10.10 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).
- 10.11 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).

- 10.12 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.
- 10.13 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square meter 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 shows how the development performs against the benchmarks, as well as the aspirational targets.

WLC summary for OFFICES

Modules	Min benchmark for OFFICE (kgCO₂e/m² GIA)	Aspirational Benchmark for OFFICE (kgCO₂e/m² GIA)	Proposal (kgCO₂e/m² GIA)
A1-A5	<950	<600	907
B-C (excl B6 & B7)	<450	<370	714
Total A-C (ex B6&B7 inc sequestration)	<1400	<970	1,622

Summary of Whole-Life Carbon results for the office development

- 10.14 In this case, the development meets the benchmarks for A1-A5 but does not meet the aspirational benchmark and does not meet the benchmarks for B-C or overall. The WLC assessment does however refer to potential opportunities and next steps which could help reduce the A1-A5 emissions which would reduce the overall emissions down to 1,565kgCO₂e/m² (or without a contingency to either 1,440 or 1,312kgCO₂e/m² GIA). This is without any reductions in Building Services (B-Modules) which uses m² rate assumptions) but may be added later to further reduce emissions. As such condition 6 is attached to make sure an updated WLC assessment is provided prior to commencement which should minimise whole life carbon emissions and achieve at least the benchmarks, unless it is clearly justified as not possible.
- 10.15 In addition, condition 7 is attached to make sure a post construction assessment of WLC is completed and provided for monitoring and compliance.

Energy and carbon reductions

- 10.16 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 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).
- 10.17 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

- 10.18 The following summary table shows how the proposal performs against the policy targets for operational 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%	25.4 %
Be green stage (renewables): CLP policy CC1	20%	10.9 %*
Total carbon reduction: LP policy SI2 and LP CC1	35%	33.5 %

Carbon saving targets (for majors) and the scheme results

*Note - This is calculated in line with the Local plan target for 20% minimum after previous reductions - so uses the same tonnages but is a slightly different percentage to the 8% in the GLA spreadsheet which is reductions against the baseline

- 10.19 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

- 10.20 Reductions are measured against the 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). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.

- 10.21 This is charged at £95/tonne CO₂/yr (over a 30-year period) which is 39.702 tonnes x £95 x 30 years = £113,150. This amount will be spent on delivery of carbon reduction measures in the Borough.
- 10.22 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments.
- 10.23 In this case, the development does not meet the policy target of 35% reductions, achieving an overall on-site reduction of 33.5% below Part L requirements as shown in the table. There is a minor shortfall of the carbon reduction requirements, which is more challenging to achieve for commercial developments. The carbon offset of £113,150 will be secured by Section 106 legal agreement to bring it to net zero carbon, in compliance with the development plan.
- 10.24 The GLA, in their Part 1 application response, agree that this carbon off-set contribution is needed. The GLA has requested that the draft s106 agreement should be submitted when available to evidence the agreement with the Borough.

Be lean stage (reduce energy demand)

- 10.25 London Plan policy SI 2 sets a policy target of at least a 15% (non-resi) reduction through reduced energy demand at the first stage of the energy hierarchy.
- 10.26 In this case, the development exceeds the policy target of 15% (non-resi), reducing emissions by 25.4% at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy and overheating which can avoid the use of active cooling in the development. The proposal includes energy efficient measures like MVHR and low energy light fittings.

Be clean stage (decentralised energy supply)

- 10.27 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.
- 10.28 In this case an assessment of the existing London heat map has been made and demonstrated that there is a District Heat Network (DHN) of Citigen network operated by E.ON located in close proximity to the site. However,

given its location and potential difficulties in installing piping along this route, with complexity of services on Farringdon Road and the Fleet Sewer along the route, a connection to this network is not proposed and the proposals have adopted for an all-electric energy strategy.

- 10.29 A dedicated room has been set aside on the proposed lower ground floor plan for future DHN. A condition is attached requiring future connections to be safeguarded (condition 14).

Be green stage (renewables)

- 10.30 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.

- 10.31 In this case, the development does not meet the policy target of 20%, indicating a 10.9% reduction at this stage through renewables. The proposal includes 23 PV panels on the roof (circa 60m²) with full details secured by a condition which also requires a meter to monitor the energy output from the approved renewable energy systems. The GLA has advised that as the roof space is quite small and the areas without PV are north facing then there is little further potential for PV. The proposal also includes low carbon heating from Air Source Heat Pumps (ASHPs), which are proposed on the roof of the building. However, as ASHP's are now assumed in the baseline for Building Regulations, then only reductions from more efficient systems help achieve further carbon reductions. The applicant is proposing plant which improves on the baseline however as the Be Green target has not been met, we encourage the applicant to further consider the efficiencies of the proposals at the next design stage to maximise reductions at Be Green given the constraints on further Solar PV through condition 15.

Be seen (energy monitoring)

- 10.32 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 a proposed building management system and energy monitoring equipment.
- 10.33 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

- 10.34 Local Plan policy CC2 expects non-residential development to meet BREEAM Excellent. The BREEAM pre-assessment shows an 'Excellent' rating with a score of 80.89%, and it meets the individual Local Plan Policy

targets of 76% of available credits for energy, water 77%, and 50% for materials.

- 10.35 Sustainable drainage includes green and blue roofs. Details of all SUDS are to be secured under a condition. The mitigation of overheating has been considered through the implementation of the cooling hierarchy where feasible, supported with overheating analysis and dynamic thermal modelling exercises. The cooling hierarchy has been applied by using passive measures such as optimising glazing ratios, with horizontal and vertical shading along terraces and roof vegetation, efficient lighting, maximising floor to ceiling height, openable vents, and mechanical ventilation with efficient heat recovery to minimise overheating and reducing active cooling (air con) load in line with policy CC2. A condition is attached to ensure that details of passive cooling measures are submitted and approved and implemented thereafter, in the interests of complying with the climate change policies.

11. AIR QUALITY

Operational effects of proposed development in local area:

- 11.1 The use of the development has been rated air quality neutral as there will be no CHP or other combustion heat source emissions and the development trip rate is below the benchmark trip rate.
- 11.2 The predicted annual average concentrations of NO₂ at receptor locations are considered acceptable at baseline and with and without development scenarios at receptor locations.
- 11.3 The Council's Air Quality Officer has noted that insufficient information has been provided with respect to the number, size, capacity and frequency of back-up generators and whether alternatives including mains electricity or battery powered equipment have been considered, if practicable. The information is needed to protect the amenity of neighbouring occupiers. A condition to secure this information is attached accordingly.

Operational effects on future occupiers:

- 11.4 The application site is not located in an Air Quality Focus Area.
- 11.5 Ventilation intakes should be located away from pollution sources – as close to roof level as possible and away from any generator flue and other emission sources.
- 11.6 The Council's Air Quality Officer has noted that the closest monitoring location is not representative due to its location away from major junctions and traffic similar to at the application site. Furthermore, this is in reference to the LAEI maps. The data from CAM323 would seem to provide a more

accurate representation of the site's air quality due to its location adjacent to major roads and next to a major junction. As CAM323 recorded above 40 ug/m3 for NO₂ in 2023, occupational air pollution mitigation is recommended to protect the occupants from poor air quality.

- 11.7 Due to the site being located in an area with poor air quality, further information is needed such as whether vents/inlets are proposed for the lower floors, and if so, evidence of acceptable levels of air quality should be provided.
- 11.8 Information of air inlet locations should be provided. It is preferred that the inlets for MVHR be located on the roof, away from any generator flue and away from any other polluting sources.
- 11.9 Further details on the air quality levels at the roof of the proposed development is needed. If for any technical reasons that the air quality is poor on the roof of the proposed development (modelled figures should also be provided for reference), then filtration should be added to the proposed MVHR (providing filtration for NO_x and PMs) for the health of the occupants. (Filtration should only be applied when necessary to reduce energy demand and the risk of failure due to improper maintenance.)
- 11.10 A condition is attached to require the above information to be submitted in the form of a revised air quality assessment and approved prior to the commencement of the development, together with any necessary mitigation.

Construction effects on air quality:

- 11.11 The dust risk categories have been determined for each of the four construction activities. The assessment has determined that the potential effects of dust emissions associated with the construction phase of the proposed development is 'high risk' at the worst affected receptors.
- 11.12 As such, at least 4 air quality monitors are required to be put in place, more than 3 months before construction to record the baseline and background emission levels. Mitigation measures based on the findings of the report shall be submitted to and approved by the Local Planning Authority. Conditions are attached accordingly.
- 11.13 A condition is also attached to ensure that All Non-Road Mobile Machinery (NRMM) used on the site shall include CESAR Emissions Compliance Verification (ECV) identification

12. TRANSPORT

Site location and access to public transport

- 12.1 The site is bounded by Farringdon Road, which is part of TfL's Transport for London Road Network (TLRN), to the east, Saffron Hill to the west and Charterhouse Street to the south. Holborn (the A40) located approximately 180m south-west from the site forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
- 12.2 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).
- 12.3 The closest London Underground stations are Farringdon and Chancery Lane, approximately 240m north and 450m south-west of the site. Farringdon station also provides National Rail and Elizabeth Line services.
- 12.4 The closest bus stops are located on Charterhouse Street and Farringdon Street, approximately 50m south-west and south of the site.
- 12.5 The site is easily accessible from the Strategic Cycle Network with Cycleway C6 to the east at Farringdon Road and west on Saffron Hill, which provides a link to King's Cross railway station.
- 12.6 The nearest Santander cycle hire docking station is located on Hatton Garden, approximately 250m west of the site.
- 12.7 The nearest dedicated parking bay for dockless rental e-bikes and rental e-scooters is located on Holborn, approximately 60m west of the site. However, this bay is already showing signs of overcapacity and increasing demand.
- 12.8 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades between 1b and 5 in the vicinity of the site, which indicates opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

Trip generation

- 12.9 Trip generation was calculated by interrogating TRICS database. The total forecast person trips for the proposed development are presented in Table 4.8 of the TA and reproduced here:

Mode	Daily		AM Peak Hour (08:00-09:00)		PM Peak Hour (17:00-18:00)	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Rail	187	187	58	5	3	53
Underground	492	494	154	13	8	141
Elizabeth Line	111	111	35	3	2	32
Walk	112	112	35	3	2	32
Bus	126	126	39	3	2	36
Taxi	8	8	3	0	0	2
Bicycle	75	75	23	2	1	21
Motorcycle	0	0	0	0	0	0
Car Driver	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0
Total*	1,110	1,113	347	29	17	318

- 12.10 It is important to acknowledge that the office space is at present occupied by offices for university administrative staff, which operate only during term time. In general, the site is significantly underutilised, with not all floors of the building in use. The existing building generates 787 a.m. person trips and 789 p.m. person trips.
- 12.11 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 Charterhouse Street and Farringdon Street, and the wider Hatton Garden area. 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.
- 12.12 An Active Travel Zone (ATZ) assessment included in the TA focuses on seven routes to key destinations. The analysis demonstrates there are opportunities for improvements to walking and cycling environment, which is pertinent given the Council's commitment to implement the Safe & Healthy Streets programme in the Hatton Gardens Area.

Travel planning

- 12.13 A framework travel plan 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 walking mode share should be more ambitious. Modal share projections for walking

and cycling will need to be set in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

- 12.14 A Travel Plan covering an associated monitoring and measures contribution of £11,348 will be secured by legal agreement if planning permission is granted.

12.15 Access and permeability

- 12.16 The main pedestrian access for office users will be on Farringdon Road. Access to the retail and affordable jewellery workshops will be via multiple entrances on Farringdon Road, Charterhouse Street, and Saffron Hill. Cycle access is from Saffron Hill. Vehicle access will be maintained for servicing purposes only.

Cycle parking

- 12.17 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for:
- 12.18 A1 use (Food Retail): 1 space per 175 sqm (GEA) long stay, 1 space per 20 sqm up to 750 sqm, then 1 space per 150 sqm (GEA) short stay.
- 12.19 A1 use (Non-food retail): 1 space per 250 sqm up to 1000 sqm, then 1 space per 1000 sqm (GEA) long stay, first 1000 sqm: 1 space per 60 sqm; thereafter: 1 space per 500 sqm (GEA) short stay.
- 12.20 B1 use (Business Offices): 1 space per 75 sqm (GEA) long stay, first 5,000 sqm 1 space per 500 sqm, thereafter 1 space per 5,000 sqm (GEA) short stay.
- 12.21 B1 use (Light Industry): 1 space per 250 sqm (GEA) long stay, 1 space per 1,000 sqm (GEA) short stay.
- 12.22 218 long stay and 29 short stay cycle parking spaces are required.
- 12.23 Long stay cycle parking will be provided on the lower ground floor and accessed step free from Saffron Hill. It will comprise: 176 two-tier stands (81%), 10 Sheffield stands (5%), 20 Foldable bike lockers (9%), 12 Accessible spaces (6%).
- 12.24 Since servicing is proposed from Saffron Hill, the Delivery & Servicing Plan which is to be secured under a S106 agreement must include measures to ensure that there are no conflicts between the delivery/servicing vehicles and users of the building, particularly cyclists.

- 12.25 The applicant is willing to provide an off-site contribution towards visitor cycle parking. It is therefore requested to secure £4,500, via legal agreement, towards 15 Sheffield stands to be provided on the public highway in a suitable location close to the site.

Car parking and vehicle access

- 12.26 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.
- 12.27 The development is proposed as car-free, which would be secured by legal agreement if planning consent were granted.
- 12.28 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.'
- 12.29 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'.
- 12.30 'National disability, accessibility and blue badge statistics: 2021 to 2022' published on 18 January 2023, report that on 31 March 2022, 4.3% of the population held a Blue Badge, an increase of 3.6% since March 2021.
- 12.31 Therefore, it is considered appropriate to seek an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location within 50m from the site.
- 12.32 Officers expect the large majority of guests and staff 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. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. It is therefore considered reasonable that the developer is required to fund an additional electric vehicle charging point (fast charger) to 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 if planning permission were granted.

CPZ Review

- 12.33 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.'
- 12.34 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 of parking. The review recommends, amongst others, that the CA-D hours of operation are extended subject to consultation and decision-making processes.
- 12.35 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 Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough.
- 12.36 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 request a contribution of £30,000 towards the CA-D CPZ review, which is likely to take place in 2025/26.

Construction management

- 12.37 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.
- 12.38 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.
- 12.39 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.
- 12.40 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.
- 12.41 The development will require 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.
- 12.42 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.

- 12.43 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 if planning permission is granted.

Deliveries and servicing

- 12.44 A Delivery and Servicing Plan (DSP) was provided with the application. The development is proposed to be serviced from Saffron Hill via a new on-site loading bay at the north of the site. Due to height limitations this would be able to accommodate a 3.5t panel van as the largest vehicle, with a length of approximately 5.4m and a maximum height of 3.0m.
- 12.45 The proposed loading bay is located south of controlled bollards, beyond which Saffron Hill is owned and operated by De Beers at neighbouring 17 Charterhouse Street. Facilities Management for the proposed development would also have control of these bollards and would enable access for delivery and servicing vehicles. Vehicles would reverse into the loading bay on the site from Saffron Hill, and egress in forward gear to travel north and exit Saffron Hill. Swept paths analysis for a 3.5t panel van is considered acceptable.
- 12.46 Larger service vehicles would be able to access the site via Saffron Hill. However, there is limited space for larger vehicles to turn within Saffron Hill. The space between no. 19 Charterhouse Street and 17 Charterhouse Street is privately owned (by 17 Charterhouse Street) and the space is managed accordingly. Should planning permission be granted, it will be subject to a Delivery and Servicing Plan (to be secured under a S106 agreement) which will ensure that there are arrangements for delivery and servicing vehicles for the development to access and use the site without compromising the safety of occupiers of the building or other users of Saffron Hill.

Highway works

- 12.47 The financial contribution towards highways works is a standard request applicable to all major developments where construction works might result in damage to public highway. We will therefore be requesting a highways contribution of £20,000 to be secured by legal agreement if planning permission is granted.

Pedestrian, cycling and environmental improvements

- 12.48 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments place pressure on the existing infrastructure and services and benefit directly from new and

improved safe and healthy street schemes we are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on our ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.

- 12.49 In line with the increase in walking and cycle trips generated by the proposed development and further promoted by the requested Travel Plan, we will seek a financial contribution of £350,000 towards the commitments outlined in the Holborn Vision SDP for the Hatton Garden East area and CTS Safe & Healthy Streets interventions and wider improvements within the Hatton Gardens Area. The requested contribution reflects the uplift and transport impact of the proposed development and is consistent with other office developments in the borough.

Micro and shared mobility improvements

- 12.50 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.
- 12.51 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 12.52 A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured as a Section 106 planning obligation if planning permission is granted. 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.

Conclusion

- 12.53 The proposal is acceptable in terms of transport implications subject to the following conditions and planning obligations being secured by legal agreement:
- Travel Plan and associated monitoring and measures contribution of £11,348.
 - Off-site cycle parking contribution of £4,500.
 - Car-free development.

- Off-site accessible car parking contribution of £4,000.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- CA-D CPZ review contribution of £30,000.
- Construction management plan (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 works contribution of £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution £350,000.
- Micromobility improvements contribution of £10,000.

13. LANDSCAPING AND BIODIVERSITY

- 13.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It expects developments to incorporate additional trees and vegetation. This approach is supported by LP policy G5 which uses Urban Greening Factor (UGF) targets to evaluate the quality and quantity of urban greening. The policy applies a target of 0.3 for mainly commercial schemes.
- 13.2 The proposed Urban Greening Factor Plan would achieve a score of 0.302
- 13.3 A Landscape and Ecological Management Plan has been submitted and this confirms that the existing site has negligible value for habitats or species. A Biodiversity Net Gain Exemption Statement has been submitted; this notes that the site currently comprises buildings and that it falls below the threshold for the provision of Biodiversity Net Gain, i.e. no impacts to any priority habitats, less than 25 sq m of on-site areas based habitats with ecological value affected, less than 5 m of on-site linear based habitats affected.
- 13.4 The proposed landscaping plans indicate perimeter planting and central island planting are proposed to all of the external terraced areas on the new floors. The 2nd to 5th storey link between the application building and 17 Charterhouse Street (above the steps to Saffron Hill) is also to be landscaped with new planting. Multi-stem trees such as *Arbutus unedo* and plants like *Buxus sempervirens*, *Helleborus Orientalis*, and *Lavandula angustifolia* ensures year-round visual interest and biodiversity value. The roof-top gardens incorporate a diverse mix of flowering perennials, ornamental grasses, and structured shrubs to provide dynamic visual interest throughout the year. The raised beds foster a sense of connection promoting sustainability and biodiversity.

- 13.5 The Landscaping and Ecological Management Plan also indicates opportunities for providing and enhancing species: the provision of bird and bat boxes, greening of the roofs and planting of trees and the provision of a pond. The measures are recommended to be provided by way of a mitigation strategy. Officers recommend that a condition is attached to any planning permission to ensure the submission and approval of a Landscaping and Ecological Management Plan, and the implementation thereafter prior to occupation. Condition 32 is duly attached.
- 13.6 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

14. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 14.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3m construction costs. To ensure local people benefit from these opportunities in line with CLP policy E1, the Economic Development Team will work with the developer to deliver several benefits from the development.

Construction Phase

- 14.2 Apprenticeships - as the build cost for this scheme will likely exceed £3 million the applicant must recruit 3 construction apprentices 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. Recruitment of construction apprentices should be conducted through the Council's Euston Skills Centre (formally Kings Cross Skills Centre).
- 14.3 Construction Work Experience Placements - The applicant should provide a set number of work experience placements (this is one placement per 500 sq m of employment floor space) of not less 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 an uplift of 1946 sqm commercial E office floor space, this would be 3 work experience placements
- 14.4 Local Recruitment – The Council's standard local recruitment target is 20%. The applicant should work with the Euston Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely (i.e. CWF as they've stated).
- 14.5 Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business

premises CPG. The Council's local procurement code sets a target of 10% of the total value of the construction contract.

14.6 End Use / Occupation Phase Opportunities:

14.7 Sections 72-75 of the CPG set out the Council's expectations about employment in the completed development. This applies for developments with an increase of 1,000sqm or more in employment space

14.8 The Council will require a specific number of end use apprenticeships through the S106 agreement. 2 would be good on a rolling term of 5 years for the future occupier of the employment space. This should be conducted through Camden Future Talent.

14.9 The developer and future office occupiers should also confirm their commitment to ensuring the site offers local employment benefits in the long term by:

- Working with Camden Learning/STEAM on school engagement if applicable (depending on the future tenants)
- Joining the Council's Inclusive Business Network and promoting this and good employment practice.
- Working with the council to deliver work experience placements through the new attraction through Camden Future Talent.
- 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.

Section 106 Contribution

14.10 Section 73 of the 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 overall uplift of floor space of 1946sqm.

14.11 This contribution would be calculated as follows:

- $\text{Net increase in floor space (sq m GIA)} / 12\text{sqm [space requirement per full time employee]} = \text{full time jobs created}$
 $\text{Full time jobs created} \times 21\% [\% \text{ of Camden residents who work in Camden}] \times 35\% [\% \text{ of employees requiring training}] \times £3,995 [\text{£ per employee requiring training}]$

- Net increase in floor space (sqm GIA) 1946sqm / 12sqm [space requirement per full time employee] = 162 full time jobs created
- Full time jobs created 162 x 21% [% of Camden residents who work in Camden] = 34 jobs for Camden Residents
- 34 x 35% [% of employees requiring training] = 11 employees who need training
- 11 x £3,995 [£ per employee requiring training] = £43,945.00 employment and training contribution.

15. WASTE/RECYCLING STORAGE AND COLLECTION

- 15.1 A Waste Storage and Collection Report has been submitted and this notes that delivery and servicing vehicles currently access the site via Saffron Hill. Saffron Hill is a private road with public rights of way. The existing building is not fully occupied and as such the waste generated and frequency of waste collection is minimal. Due to the smaller size of the private collection vehicle compared with LB Camden vehicles, it is able to turn around at the southern end of Saffron Hill and then travel northbound in forward gear.
- 15.2 A single shared waste store, located on the lower ground floor, is proposed adjacent to the proposed loading bay. It is proposed that this waste store accommodate two days of waste generation. This allows for daily collection of each waste stream, plus contingency should a collection be missed. It is proposed that the following bins be accommodated within the waste store:
- 1 x 1,100 L Eurobin for general waste
 - 2 x 660 L Eurobins for paper and cardboard and dry recyclables
 - 5 x 360 L Wheeled bins for glass
 - 4 x 240 L Wheeled bins for food waste
- 15.3 These bins provide a total capacity of 5,180 L.
- 15.4 As per the current arrangement it is proposed that waste be collected daily by a private contractor. Waste collection vehicles up to 6.6 m in length would access the bins via Saffron Hill. Waste collection vehicles would travel southbound down Saffron Hill before turning at the southern end and then travelling north.
- 15.5 The commitment to prioritising the prevention of waste production through segregation of waste into different recycling waste streams, set out in the submitted Waste Strategy, is supported by the Council. The provision of the waste and recycling facilities, and their collection and management are to be secured by way of a 'compliance' condition (condition 5).

16. FIRE STATEMENT

16.1 Policy D12 of the London Plan requires a Fire Statement to be submitted with fire safety measures to comply with the functional requirements in Part B of the Building Regulations 2010.

16.2 A Fire Statement (by DAMA Engineering Consultants) has been submitted. This meets London Plan requirements by way of the inclusion of :

- Means of Escape and Evacuation Strategy: The evacuation strategy sets down provisions for all individuals, including those with disabilities or other specific needs.
- Passive and Active Fire Safety Measures: The passive and active fire safety measures includes a Category L1 fire detection and alarm system, automatic sprinkler protection, fire compartmentation, and fire-resistant materials.
- Access and Facilities for the Fire and Rescue Service: The proposed access for the fire and rescue services will be provided in line with guidance from BS 9999. This includes firefighting shafts, clear and unobstructed access routes for fire appliances, and hydrants located within 90m of the building.
- Modifications to the Development and the 'Golden Thread' of Information: The Fire Statement emphasises the importance of maintaining accurate and traceable fire safety information throughout the building's lifecycle.
- Compliance with Regulations: The Fire Statement confirms that the proposed development complies with the requirements outlined in the London Plan Guidance and Part B of the Building Regulations 2010 (as amended)

16.3 The GLA, in their Part 1 consultation response, have noted that 'the proposal meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with London Plan Policies D12 and D5'.

16.4 A condition will be attached that the development should be undertaken in accordance with the Fire Safety Report.

17. CRIME IMPACT ASSESSMENT

17.1 A Crime Impact Assessment has been submitted with recommendations for security improvements. The proposed uses will provide levels of activity across an extended period of hours. An increase in natural surveillance of

the adjacent areas will result from the proposed uses and layouts. Given a medium crime designation at this location, the requirements listed in the Crime Impact Assessment are deemed commensurate to risk and incorporation within the build specification would allow claim to be made to support achievement of BREEAM security requirements. It should be noted the principles of the Secured by Design accreditation scheme have been used to inform the assessment where SBD requires a minimum standard of installation is required, irrespective of crime risk.

- 17.2 Specifications/security requirements for the doors, windows, glazing, access control, core protection, vehicle entry, bin storage, cycle storage, emergency exit doors, lighting, boundary, manual security, electronic security, intruder facility, parcel storage and post room are identified in the Crime Impact Assessment. An condition is to be added that Secure-by-Design accreditation should be obtained.

18. FLOODING & DRAINAGE

- 18.1 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.
- 18.2 In this case, the development incorporates SUDS and blue roofs with a capacity of 102.8 m³ and run-off of 7.04 l/s which is a significant reduction from the existing discharge rate of 60.22 l/s for a 1 in 100 year rainfall event. Details of this system will be secured by condition 24.
- 18.3 The Lead Local Flood Authority advised that Saffron Hill has a high flood risk so finished floor levels set to at least the same level of the footpath and ensuring a fall away would not be adequate in this location.
- 18.4 In response, the finished floor levels for the lower ground floor areas associated with the new development have been set at a minimum of 8.650m AoD, providing a freeboard of 310mm above the predicted flood level.
- 18.5 To mitigate flood risk, the finished floor levels in the jewellery workspace have been raised to create a gradient sloping away from the building, representing an improvement over the existing condition.
- 18.6 Additional flood mitigation measures have been implemented, including the relaying of the threshold drainage channel and the installation of a gully at the low point to prevent water ponding, bund walls around the lower ground plant rooms and raised sensitive electrical equipment. These will be secured through condition 25.

- 18.7 A comprehensive Flood Risk Emergency Plan has also been developed, outlining flood triggers and clearly indicating evacuation routes.

19. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 19.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.
- 19.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2). It is estimated that the Mayoral CIL will be as follows: Offices - £2,633,907.20, Retail - £60,605.00, Jewellery - £49,290.80
- 19.3 The proposal will also be liable for the Camden Community Infrastructure Levy (CIL). It is estimated that the Camden CIL liability will be as follows: Offices - £1,550,064.00, Retail - £11,470.00, Jewellery - £19,240.00

20. CONCLUSION

- 20.1 The proposed development would comply with the London Plan and Camden Local Plan policies for land use and growth in the Central London Area and it would include 520 sqm of affordable jewellery workspace in accordance with the Local Plan policy requirement for new commercial development in Hatton Garden.
- 20.2 The building would be a Tall Building as defined by the new Draft Local Plan. However, the scale of the development is considered to be appropriate in the context of the area and there would be no noticeable effects on the LVMF protected views of St Pauls' either from LB Camden or from outside of the Borough.
- 20.3 The development would result in 'less than substantial harm' to the setting of the neighbouring Listed building 25-27 Farringdon Road and the character and appearance of the Hatton Garden Conservation Area. The proposals have been modified by way of set-backs, textured elevational designs and treatments to respect the character and appearance of the Conservation Area and the setting and attributes of the Listed building. The less than substantial harm to the heritage assets would be outweighed by the public benefits ensuing from the development, viz: new and improved employment floorspace meeting current standards, new retail/restaurant facilities, affordable jewellery workspace, improved permeability, legibility and urban design.
- 20.4 No neighbouring occupiers would be unduly affected in terms of loss of light, privacy or outlook.

- 20.5 Subject to a Servicing & Delivery Management Plan, Construction Management Plan and contributions to off-site cycling, highway works and pedestrian improvements in the area (all to be secured in a S106 agreement), the development would not prejudice the transport infrastructure. The S106 agreement would also secure the provision of appropriate employment and training contributions and a carbon off-set contribution to equivalent carbon zero technologies in the Borough.

21. RECOMMENDATION

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

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Off-site cycle parking contribution of £4,500.
- Car-free development.
- Off-site accessible car parking contribution of £4,000.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- CA-D CPZ review contribution of £30,000.
- Construction management plan (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 works contribution of £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution £350,000.
- Micromobility improvements contribution of £10,000.
- 520 sq m of affordable jewellery workspace at peppercorn rents in perpetuity
- 3 construction apprentices plus support fee (£5,100)
- 3 construction work experience placements
- 20% local recruitment
- Camden Local Procurement Code
- 2 end use apprenticeships
- Local employment benefits package
- £43,945.00 employment and training contribution
- Energy and Sustainability Strategy including BREEAM
- Carbon offset contribution of £113,150
- Retention of architect - DSDHA

22. LEGAL COMMENTS

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

23. CONDITIONS

1 Time limit

The development hereby permitted must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 Approved drawings

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

19CS-DSD-MB:

00-DR-A-10100, 01-DR-A-10101, 02-DR-A-10102, 03-DR-A-10103, 04-DR-A-10104, 05-DR-A-10105, 06-DR-A-10106, 07-DR-A-10107, B1-DR-A-10098, LG-DR-A-10099, ZZ-DR-A-10000, ZZ-DR-A-10001, ZZ-DR-A-10002, ZZ-DR-A-10301, ZZ-DR-A-10302, ZZ-DR-A-10303, ZZ-DR-A-10304, ZZ-DR-A-10305, ZZ-DR-A-10306, ZZ-DR-A-10307, ZZ-DR-A-10401, ZZ-DR-A-10402, ZZ-DR-A-10403, ZZ-DR-A-10404, ZZ-DR-A-10405, ZZ-DR-A-10406, ZZ-DR-A-10407

00-DR-A-11100, 01-DR-A-11101, 02-DR-A-11102, 03-DR-A-111003, 04-DR-A-11104, 05-DR-A-11105, 06-DR-A-11106, 07-DR-A-11107, B1-DR-A-11098, LG-DR-A-11099, ZZ-DR-A-11301, ZZ-DR-A-11302, ZZ-DR-A-11303, ZZ-DR-A-11304, ZZ-DR-A-11305, ZZ-DR-A-11306, ZZ-DR-A-11307, ZZ-DR-A-11401, ZZ-DR-A-11402, ZZ-DR-A-11403, ZZ-DR-A-11404

00-DR-A-02100, 00-DR-A-02101, 00-DR-A-02102, 00-DR-A-02103, 00-DR-A-02104, 00-DR-A-02105, 00-DR-A-02106, 00-DR-A-02107, 00-DR-A-02108, 00-DR-A-02109, 00-DR-A-02110, 00-DR-A-02111, 00-DR-A-02112, B1-DR-A-02098, LG-DR-A-02099 P02, ZZ-DR-A-02000, 00-DR-A-02001, 00-DR-A-02002, 00-DR-A-02301, 00-DR-A-02302, 00-DR-A-02303, 00-DR-A-02304, 00-DR-A-02305, 00-DR-A-02306, 00-DR-A-02307, 00-DR-A-02401, 00-DR-A-02402, 00-DR-A-02403, 00-DR-A-02404, 00-DR-A-02405, 00-DR-A-02406, 00-DR-A-02407, 00-DR-A-02351, 00-DR-A-02352, 00-DR-A-02353, 00-DR-A-02354, 00-DR-A-02355, 00-DR-A-02356, 00-DR-A-

02357, 00-DR-A-02358, 00-DR-A-02359, 00-DR-A-02360, 00-DR-A-02361, 00-DR-A-02362

02-DR-L-09102, 03-DR-L-09103, 04-DR-L-09104, 05-DR-L-09105, 07-DR-L-09107, 08-DR-L-09108, 09-DR-L-09109, 10-DR-L-09110, 11-DR-L-09111, 12-DR-L-09112, ZZ-DR-L-09200, ZZ-DR-L-09300

Design and Access Statement (DSDHA - April 2025), Air Quality Assessment (Tetra Tech - 04.04.2025 - 784-B069877), Draft Construction/Demolition Management Plan (produced by Mace - 25/03/2025), Daylight and Sunlight Report (Point 2 - April 2025 - RELO7 V4); Preliminary Ecology Appraisal (Arbtech - 15/10/2024), Landscape and Ecological Management Plan (Arbtech 07/04/2025), Regeneration Statement and Employment and Training Strategy (Volterra - April 2025), Energy and Sustainability Statement (Sweco - April 2025), Whole Life Carbon Assessment (Sweco - March 2025), Circular Economy Statement (Sweco - 09/04/2025), Fire Statement (DAMA - 250036), Statement of Community Involvement (March 2025), Heritage, Townscape and Visual Statement (Turley heritage - March 2025); Noise Assessment (Sweco - 6520714-SWE-ZZ-XX-T-U-0001 - 17/03/20205), Drainage Strategy Report (Davies Maguire - DMAG-2352-DSR - March 2025), Flood Risk Assessment (Davies Maguire - DMAG-2352-FRA - July 2025), Structural Feasibility Statement (Davies Maguire - DMAG-2352-RP-004 - February 2025), Transport Assessment (momentum - 03./04/2025), Travel Plan (Momentum - 25/03/2025), Delivery and Servicing Plan (Momentum 03/04/2025), Waste Storage and Collection Report (Momentum - 03/04/2025)

Reason: For the avoidance of doubt and in the interest of proper planning.

3 Air Quality Monitoring

No demolition or development shall commence until all the following have been complied with:

- a) Prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. 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;
- 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; and
- c) Prior to commencement, 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 implementation date shall be submitted to the Local Planning Authority and approved in writing.

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 submitted to the Local Planning Authority and approved in writing.

Reason: Development must not commence before this condition is discharged to manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4 and CC4 of the Camden Local Plan 2017 and policy SI1 of the London Plan.

4 Details of biodiverse areas

Prior to commencement of above ground works, full details of the biodiverse areas indicated on the 2nd to 5th floor bridge terraces and the 7th, 8th, 9th and 10th floor plans shall be submitted to and approved in writing by the local planning authority. The details shall include:

- a detailed scheme of maintenance;
- sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used; and
- full details of planting species and density.

The biodiverse areas 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.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

5 Waste and refuse storage

The bin store shown on the Proposed Lower Ground Floor Plan shall be provided prior to the first occupation of the development and permanently retained and managed in accordance with the Waste Storage and Collection Report (03/04/2025) thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

6 Whole Life-Cycle Carbon Assessment

You must apply to us for approval of an updated version of the Whole Life Carbon Assessment hereby approved at each of the following stages of development:

- (a) Prior to commencement of any work on site including all works of deconstruction and demolition.
- (b) Prior to commencement of any construction works.

Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 907kgCO₂e/m² and/or Whole Life Carbon (A1-C4) above 1,622kgCO₂e/m², which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised and where possible the GLA benchmarks for the modules should be met, unless clearly justified as not possible. You must not commence any work on site and/or construction works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

Reason: To ensure the development minimises carbon emissions throughout its whole life cycle and optimises resource efficiency in accordance with Policy SI2 in the London Plan 2021 and Policy CC1 of the Camden Local Plan.

7 Whole Life Carbon – post construction assessment

Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template shall be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance and submitted to and approved by the Local Planning Authority in writing. The Assessment shall achieve at least the GLA WLC benchmarks, unless it is clearly justified as not possible to do so. The post-construction assessment should also be submitted to ZeroCarbonPlanning@london.gov.uk and SustainabilityPlanning@camden.gov.uk, along with any supporting evidence as per the guidance.

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.

8 Noise limits for plant

The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.

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.

9 Anti-vibration isolators for plant

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.

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

10 No additional external fixtures

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents 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 building, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.

11 Thames Water infrastructure

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for

the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

12 Piling method statement

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) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan.

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.

13 Reuse and recycling of demolition waste

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.

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.

14. Future connection to heating networks

Within 3 months of the date of this permission, full details demonstrating how the approved scheme has been designed to allow for the future connection to any neighbouring heating and cooling system and/or any private wire power network shall be submitted to and approved in writing by the Local Planning Authority. Evidence that the approved scheme has been implemented shall be submitted to and approved by the Local Planning

Authority prior to the issue of a certificate of practical completion. The development shall be carried out in accordance with the approved design details and no alterations shall take place without the prior written consent of the Local Planning Authority.

Reason: To allow for the different distribution of energy, to minimise the carbon dioxide emissions and to comply with policies CC1 and CC2 of the Camden Local Plan 2017.

15. Details of PV panels incl. monitoring

Prior to the relevant works taking place on site, detailed plans showing the location and extent of photovoltaic cells 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 (to achieve targeted Be Green carbon reductions). The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policy G1, CC1 and CC2 of the London Borough of Camden Local Plan 2017.

16. Diesel or oil back up generators

Prior to commencement of above ground works 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 provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State. The back-up generators shall be retained and used thereafter only in accordance with the details approved under this condition.

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.

17. Air Quality

At least 3 months prior to commencement, a revised air quality assessment report, written in accordance with the relevant current guidance, for the existing site and proposed development shall be submitted to and approved in writing by the Local Planning Authority.

The development shall be at least “Air Quality Neutral” and an air quality neutral assessment for both buildings and transport shall be included in the report.

The assessment shall assess the current baseline situation in the vicinity of the proposed development. The report shall include all calculations and baseline data and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations.

An assessment should be made of the construction dust risk and appropriate mitigation proposed and implemented.

If required a scheme for air pollution design solutions or mitigation measures based on the findings of the report shall be submitted to and approved by the Local Planning Authority prior to development. This shall include mitigation for when air quality neutral transport and building assessments do not meet the benchmarks or if mitigation is not adequate then an air quality neutral offset payment may be agreed.

The approved design or mitigation scheme shall be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI1.

18. Mechanical Ventilation

Prior to commencement of above-ground development, excluding demolition and site preparation works, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the generator flue or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.

19. Non-road mobile machinery

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).

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.

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:

20. Details of 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:

- a) Details at 1:10 of proposed integrated seating to Charterhouse St., and final sections at 1:10 of all windows (including jambs, head and cill) and ventilation grills.
- b) Details at 1:10 of the proposed signage to the Farringdon Road entrance and to Saffron Hill.
- 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). Samples of materials to be provided at a suitable size (e.g. 1x1m) and alongside all neighbouring materials in use.

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.

Reason: To safeguard the appearance of the premises and the character and appearance of the conservation area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

21. Details of external lighting

Prior to the commencement of the development hereby approved, details of any external lighting to be provided at the site shall be submitted to and approved by the Local Planning Authority (both in writing). The external lighting details approved under this condition shall be provided in their entirety prior to the occupation of the development and permanently retained thereafter.

Reason: To safeguard the security of the immediate area and protect the amenity and appearance of the conservation area in accordance with policies C5, A1, D1 and D2 of the London Borough of Camden Local Plan 2017.

22. Details of gates/barriers

Prior to the commencement of the development, details of the gates/barriers shown on the proposed ground floor plan (P 01) hereby approved (including elevations at a scale of no less than 1:20 and proposed opening and closing times) shall be submitted to and approved by the Local Planning Authority (both in writing). The gates/barriers shall be provided in accordance with the

approved details prior to the occupation of the development and used in accordance with the approved details thereafter.

Reason: In the interests of the appearance, security and amenity of the development and the area in accordance with policies A1, D1, D2 and C5 of the LB Camden Local Plan 2017.

23. Passive, natural cooling measures

Prior to commencement of the development, details of mitigation against the use of active cooling (e.g. natural passive measures) and details of the efficiency of the mechanical cooling system shall be submitted to and approved by the Local Planning Authority. The approved details shall be provided and permanently retained prior to occupation.

Reason: In order to minimise energy consumption and following the energy and cooling hierarchies, in accordance with policies CC1, CC2, D1 of the Camden Local Plan 2017

24. SUDS – Construction in accordance with details

The sustainable drainage system as approved (Drainage Strategy Report by Davies Maguire July 2025) 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 7.04l/s run off rate. The system shall include blue roofs with total capacity of 102.8m³ as stated in the approved drawings and shall thereafter retained and maintained in accordance with the approved maintenance plan including maintenance owner.

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 and Policy SI 13 of the London Plan 2021.

25. Flood Protection Measures

Prior to commencement / occupation full details of flood protection measures including a FFL of 8.650 mm, threshold drainage channel and footpath to fall away from entrances at risk of flooding in a 1 in 100 flood event plus climate change plus bund walls in lower ground plant rooms and raised electrical equipment and gulley at the low point, shall be submitted to and approved in writing by the local planning authority. Systems shall thereafter be permanently retained and maintained in accordance with the approved details.

Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan

26. Use of terraces

The external terraces on the proposed 7th, 8th, 9th and 10th floors shall not be used before 08:00 or after 19:00 from Mondays to Fridays and at no times on Saturdays, Sundays or on Bank Holidays. No amplified sound shall be broadcast/transmitted on any of the terraces.

Reason: To protect the amenity of neighbouring occupiers in accordance with policy A1 of the LB Camden Local Plan 2017.

27. Fire Safety

Prior to occupation of the development hereby approved, the Fire Statement by DAMA Fire Engineering Consultants - April 2025 shall be fully implemented and permanently retained thereafter.

Reason: To ensure the safety of occupiers in accordance with policy C5 (Safety and Security) of the LB Camden Local Plan 2017.

28. Circular Economy statement: Delivered in accordance with details.

The Circular Economy Statement as approved (Detailed Circular Economy Statement by SWECO 9/4/25) shall be delivered to achieve at least 95% reuse/recycling/recovery of construction and demolition waste with 58% to be reused or recycled. A minimum of 20% of the total value of materials should derive from recycled and reused content.

Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.

29. Post-construction monitoring report

Prior to the occupation of the development, a post construction monitoring report and spreadsheet should be completed in line with the GLA's Circular Economy Statement Guidance. The post-construction monitoring report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. 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.

Reason: In order to maximise the re-use of materials and in the interests of sustainable waste management in accordance with policy CC5 (Waste) of the LB Camden Local Plan 2017.

30. Secure by Design

Prior to any occupation of the development, a Certificate of compliance with 'Secure by Design' shall be submitted and approved by the Local Planning

Authority (both in writing). The development shall be permanently retained and used in accordance with Secure by Design accreditation thereafter.

Reason: To ensure the security of the site and the surrounding area in accordance with policy C5 (Safety and Security) of the Camden Local Plan 2017.

31. Air Source Heat Pump

Prior to commencement of above ground works, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or more or 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 equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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 2017.

32. Landscape and Ecological Management Plan

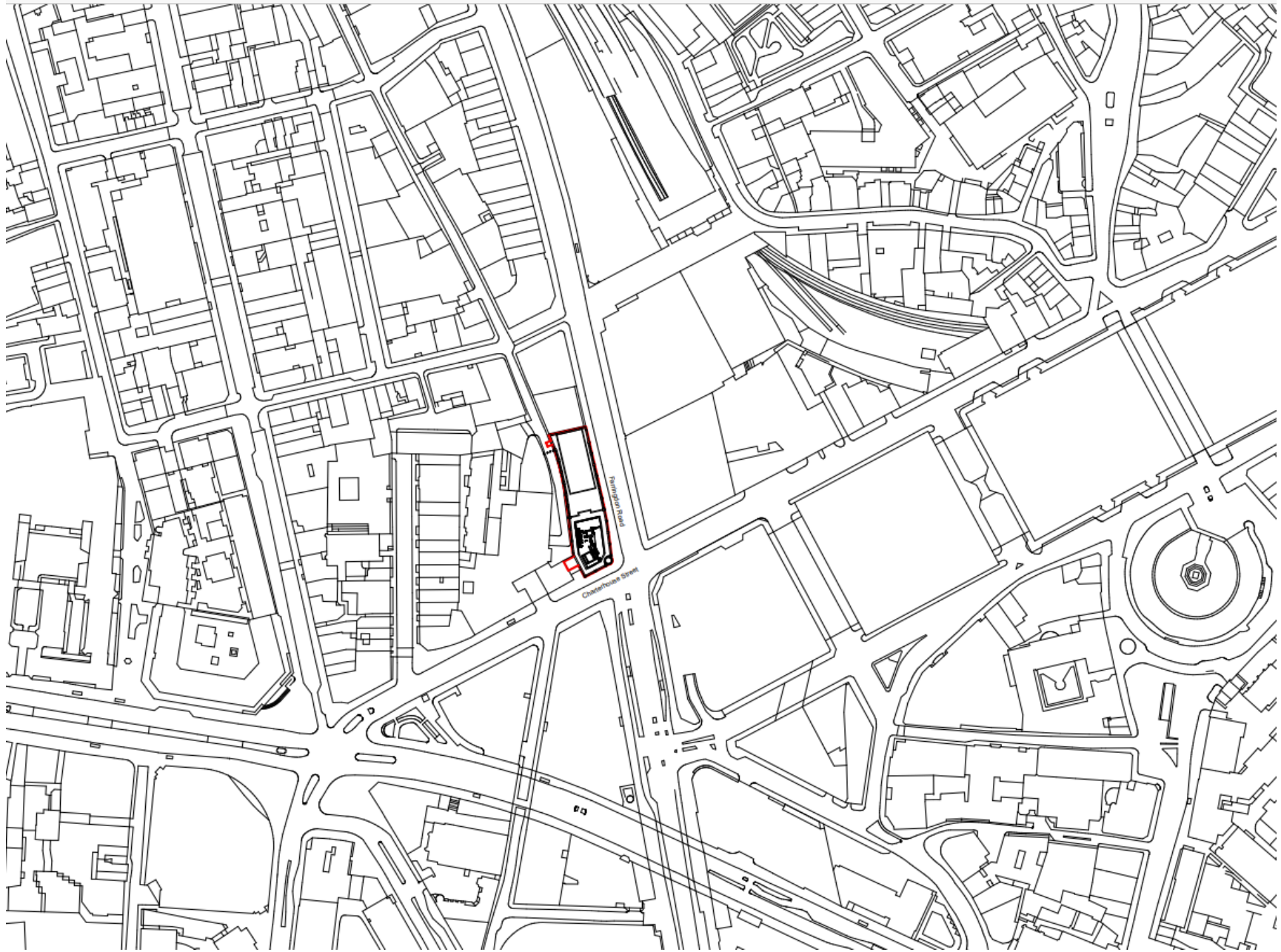
Prior to the commencement of the development a Landscape and Ecological Management Plan shall be submitted to and approved by the Local Planning Authority (both in writing). The Landscape and Ecological Management Plan shall be implemented prior to the occupation of the development and permanently retained thereafter.

Reason: To ensure that an appropriate level of biodiversity is provided and retained at the site in accordance with policy A3 of the Camden Local Plan 2017.

2025/1683/P

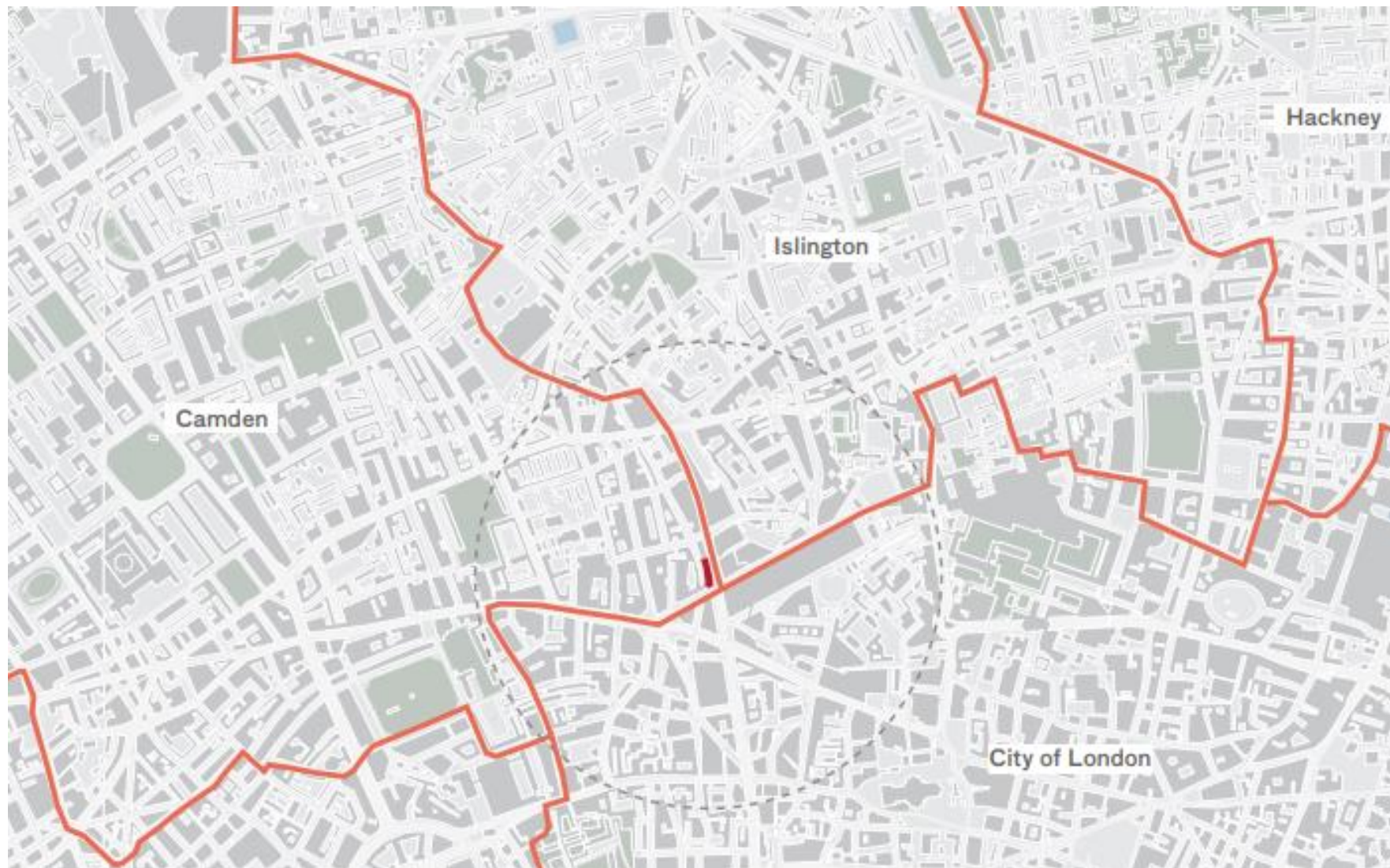
19 Charterhouse Street, EC1N 6RA

Remodelling, refurbishment and extension of the existing building to provide Use Class E (commercial, retail/restaurant and jewellery workspace), landscaped amenity terraces, balconies, relocated entrances, commuter facilities, on-site servicing yard and plant along with associated highway improvements and associated works





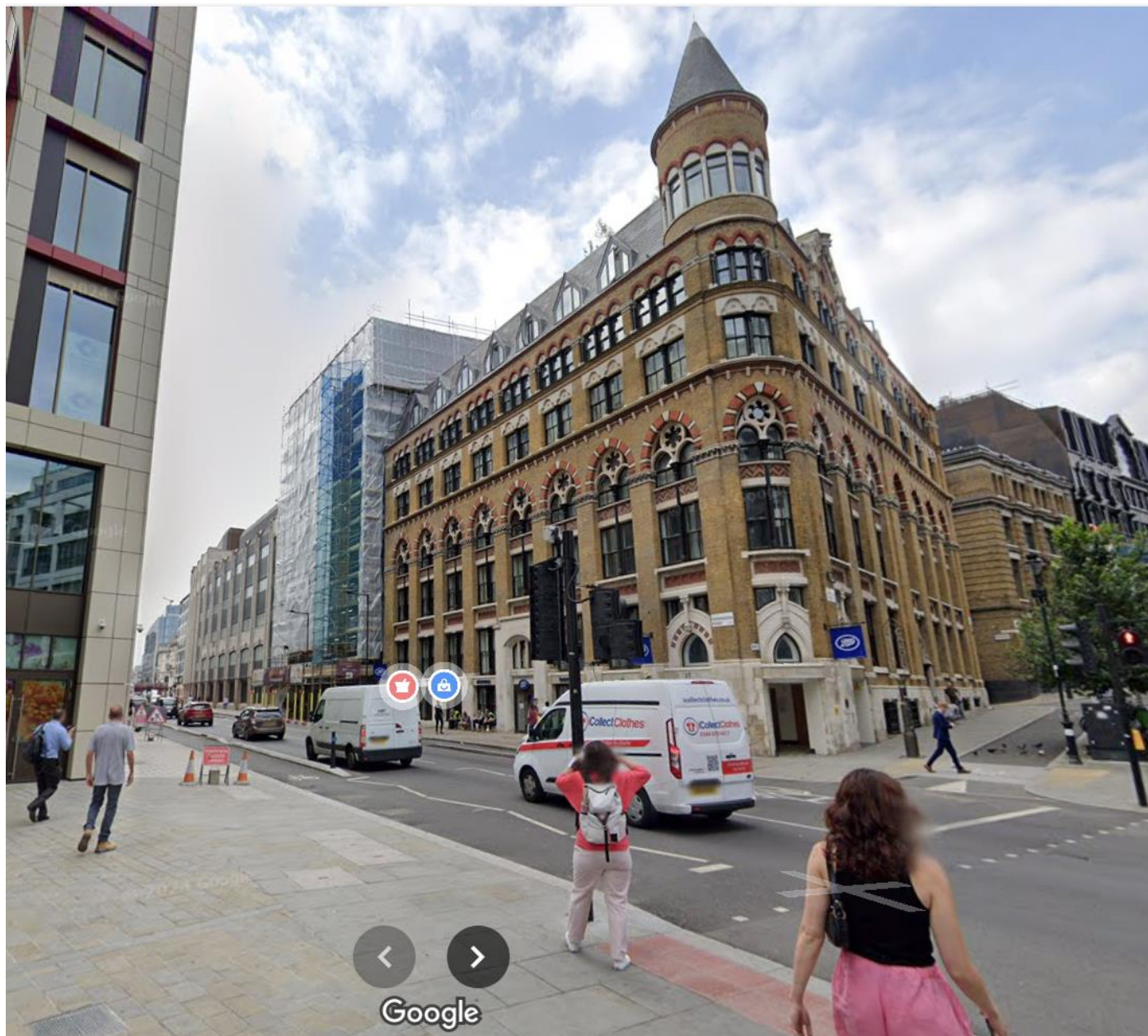
Aerial photograph from south east















Saffron Hill view approached from north



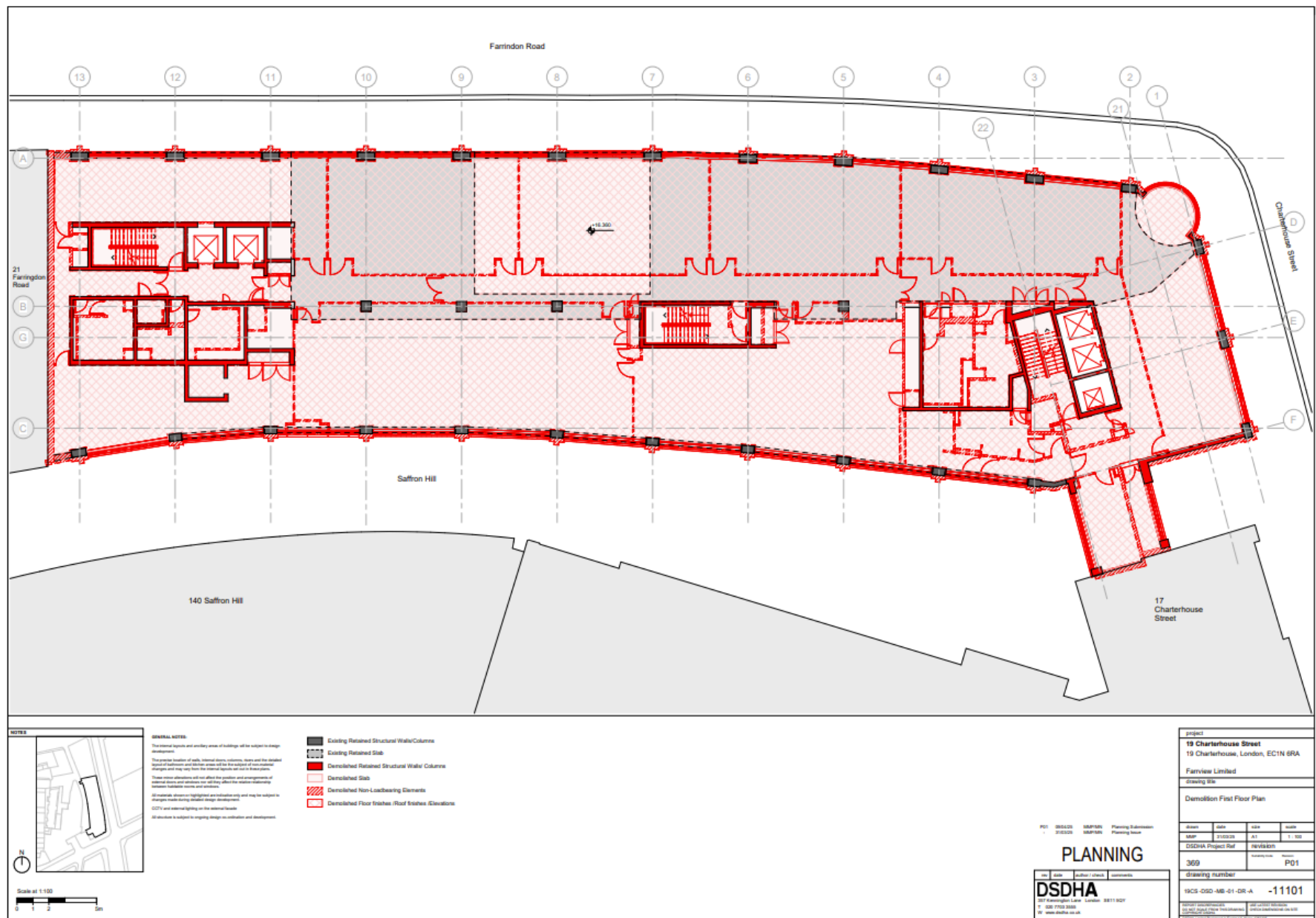
Saffron Hill with loading bay in centre of photograph and steps up to Charterhouse Street on the right

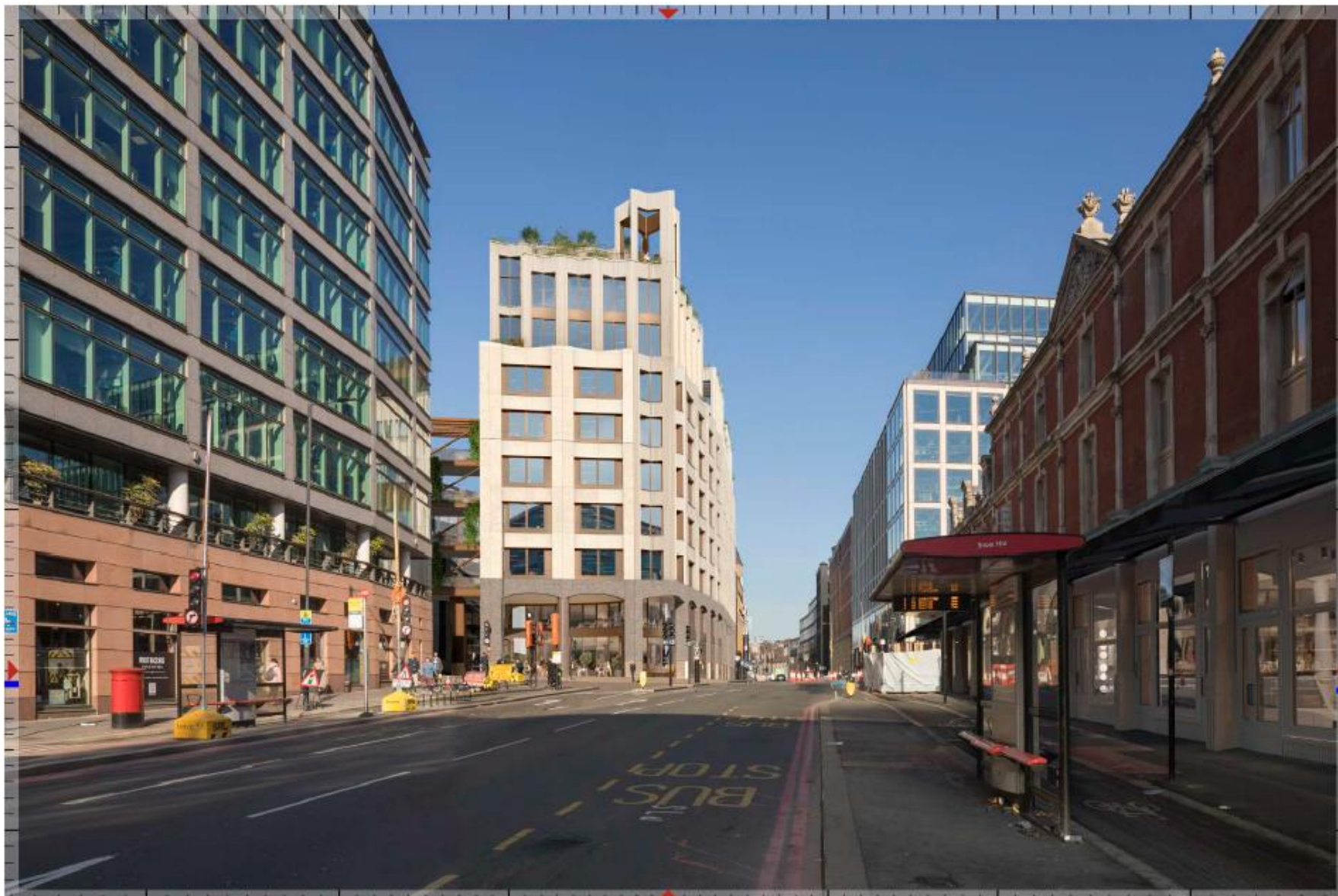


Aerial photograph from south east

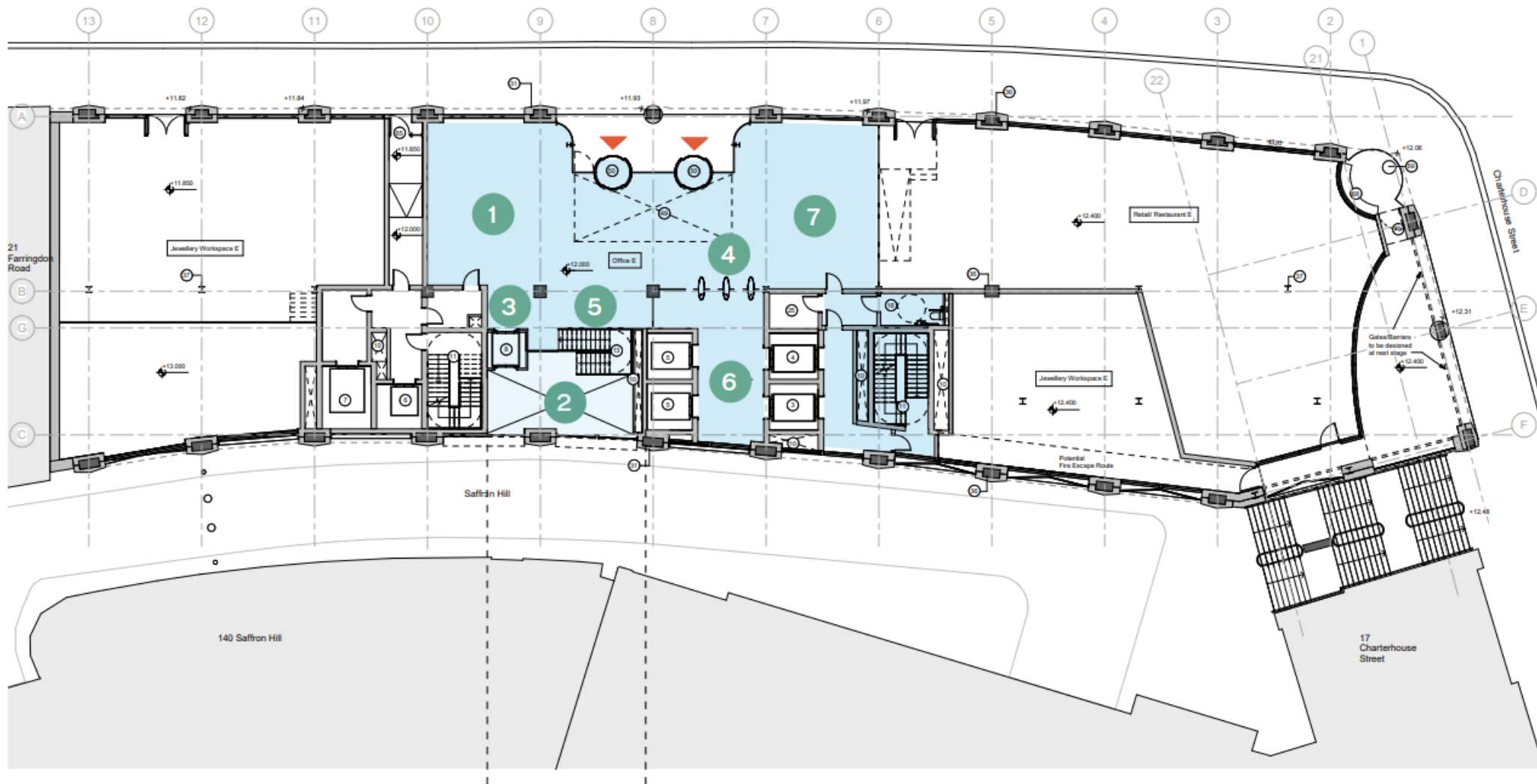
Existing building not a positive contributor to the Conservation Area

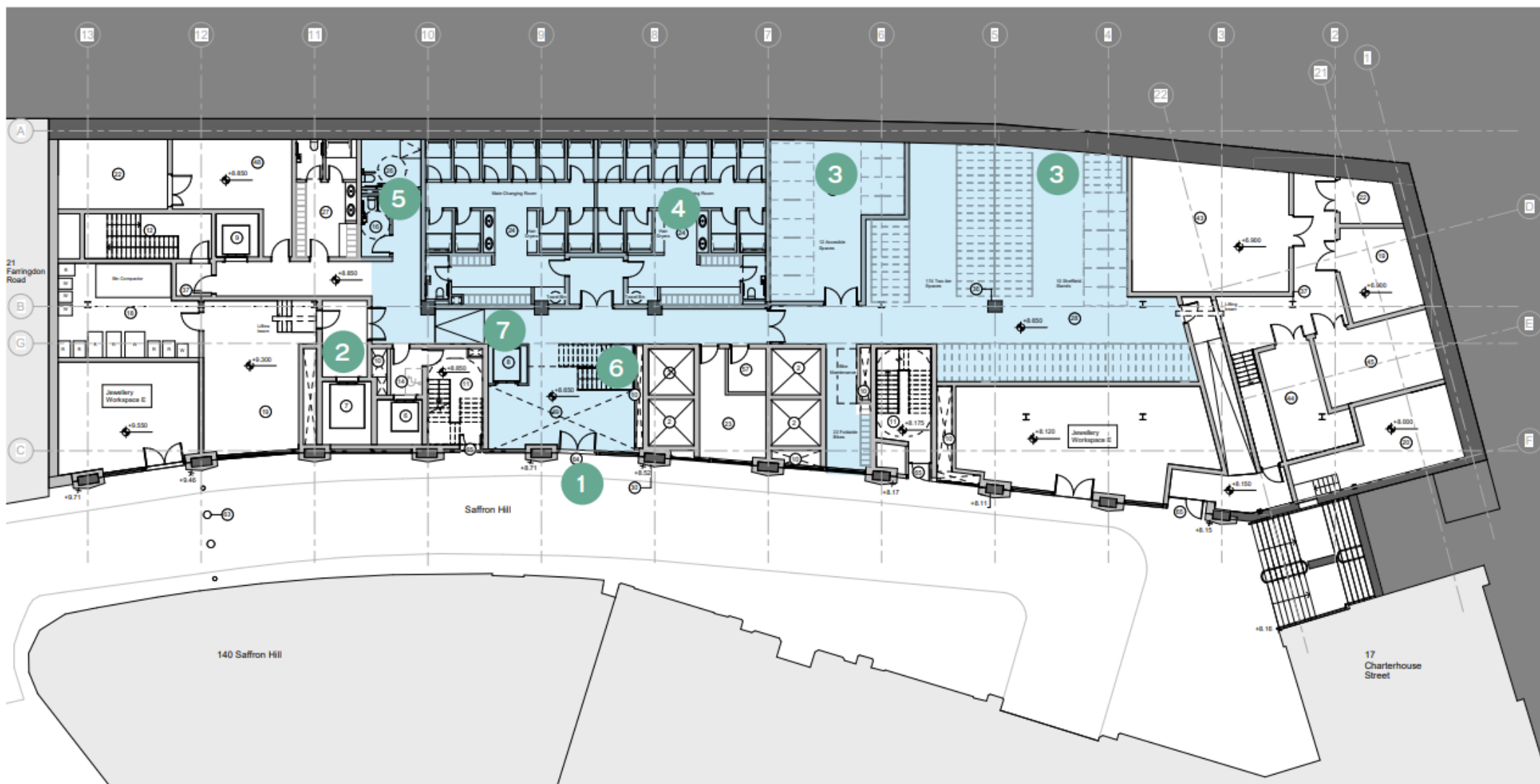




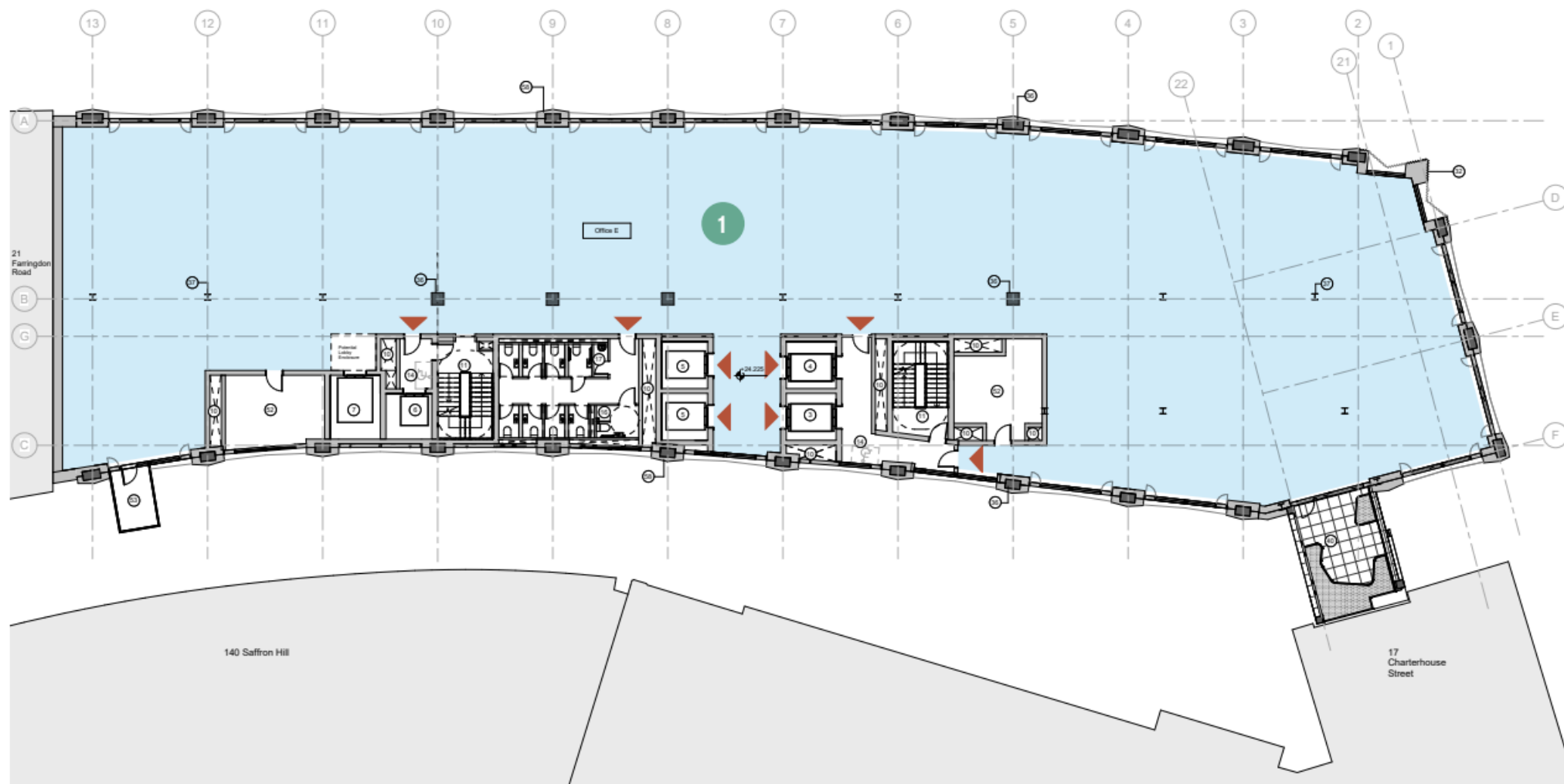




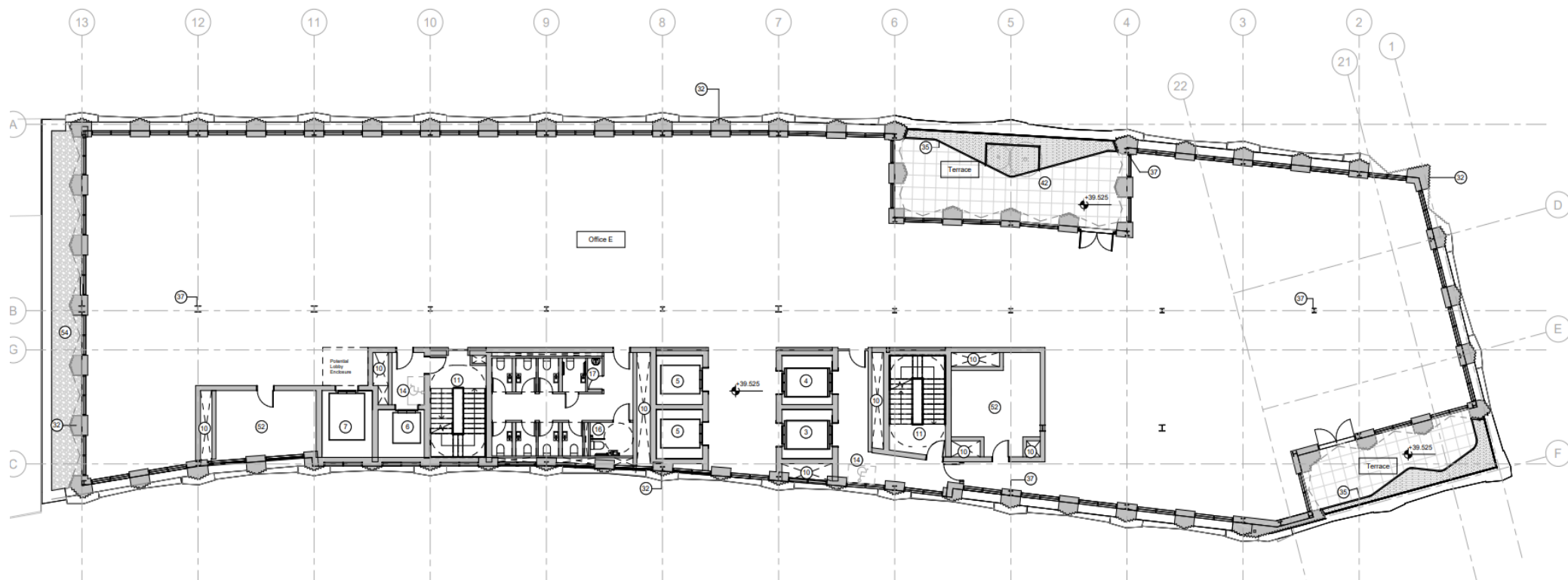


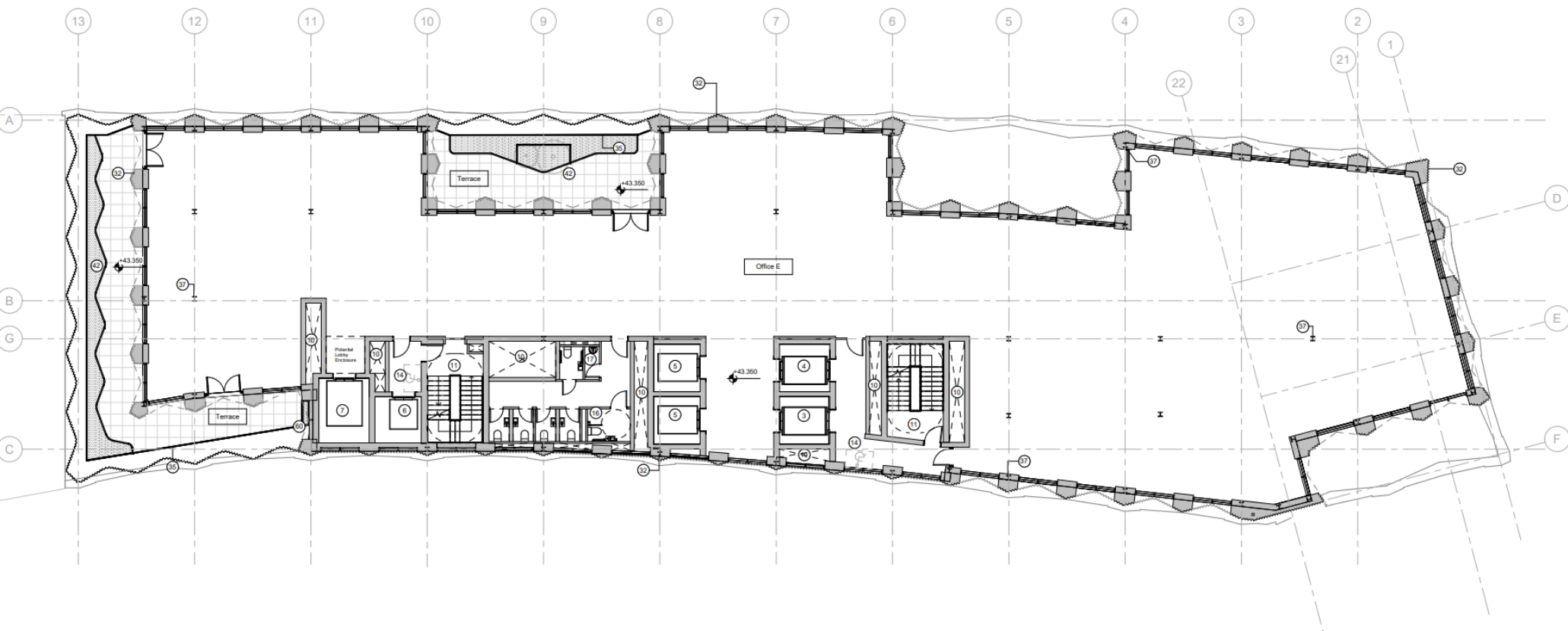


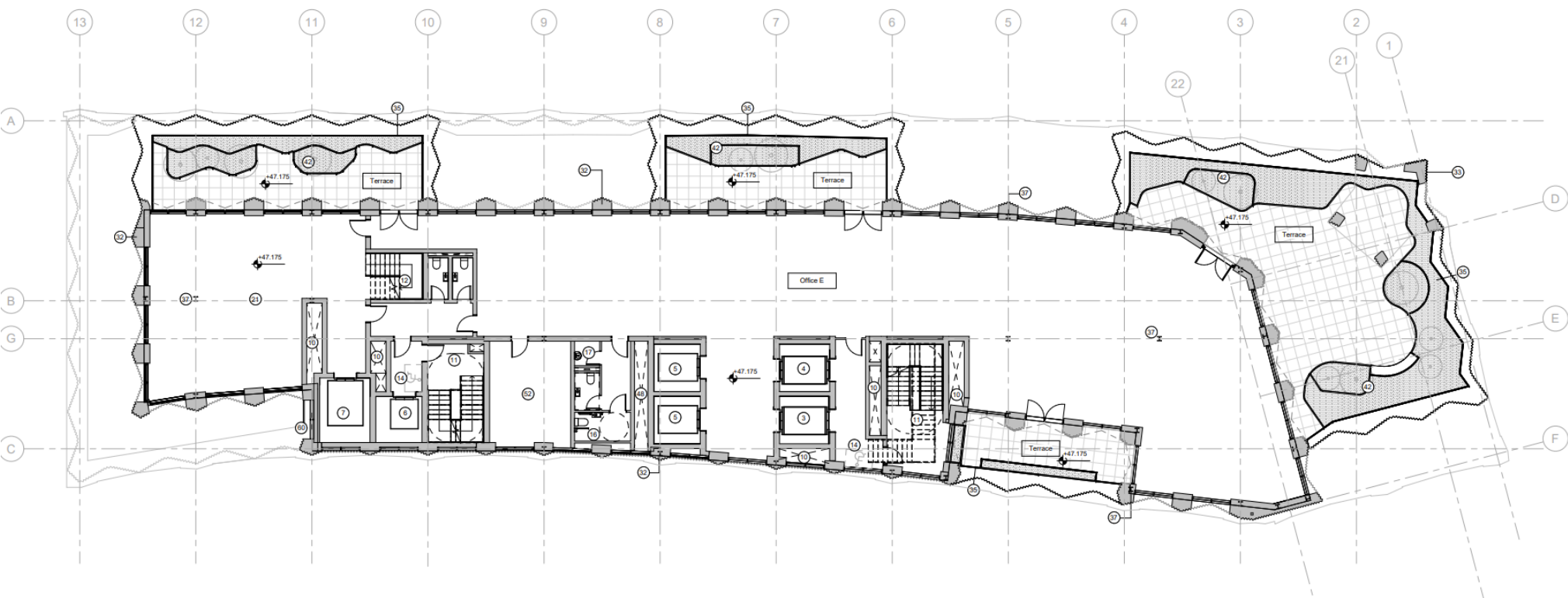
Lower ground floor plan

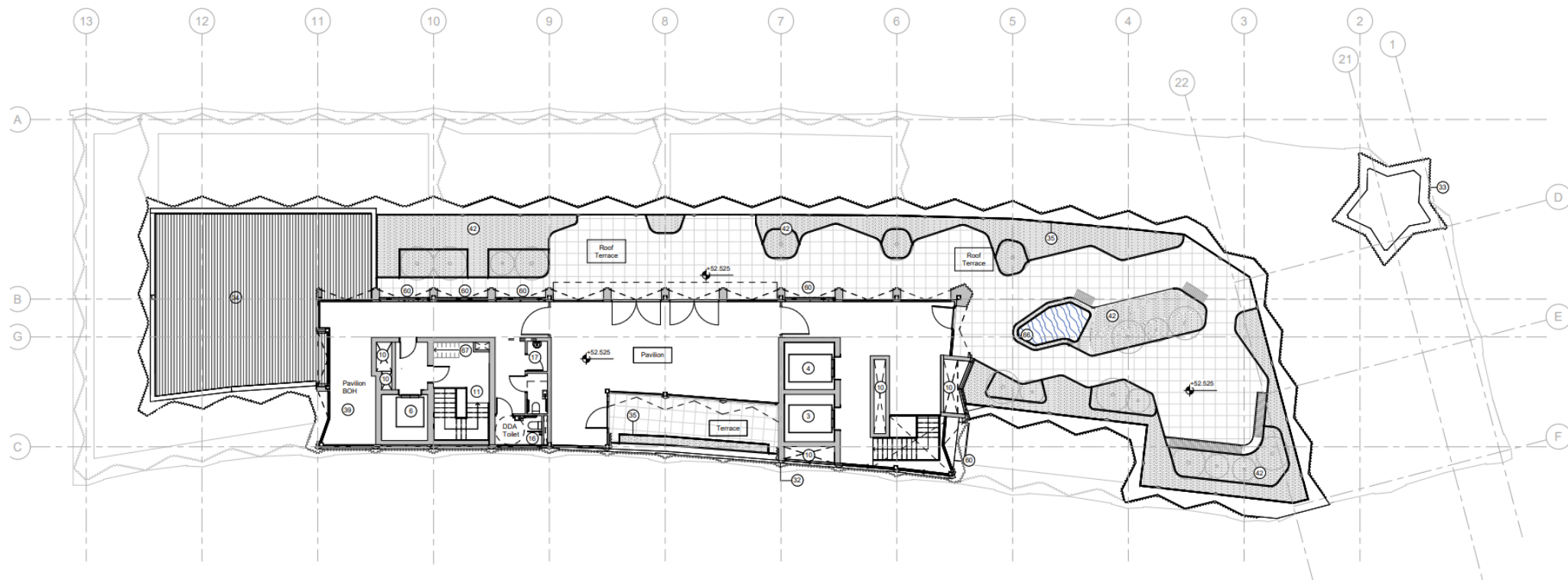


Typical floor plan











Axonometric View of the Proposal from south east



Sketch render of the proposed scheme from the south east approach



View of the proposal from Farringdon Road (CGI produced by Millerhare)

The material expression of the proposed scheme has been developed to give clear identity to the building and reflects the local context. A unified and restricted material palette ensures that the scheme can be understood as a coherent whole.

The proposal offers a light palette of materials, comprising natural stone and precast elements, combined with refined metal detailing, acknowledging the jewellery making craft of the area.

The materials graduate from rough hewn texture to smoother as your eye is drawn upwards.

The use of bronze/saffron window frames is proposed to bring warmth to the facade and reference the saffron history of the site.

- ① Rough textured concrete
- ② Polished textured concrete
- ③ Anodised aluminium / steel window
- ④ Portland Stone - Roach bed
- ⑤ GRC/Precast Concrete
- ⑥ Weathered Steel to Saffron Hill lower levels

