

26 September 2023
L230926 - SAV Cover Letter



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SUBMITTED VIA PLANNING PORTAL PP-12388049

Dear Sir or Madam

**APPLICATION FOR PHYSICAL WORKS TO EXISTING ROOF AND EXTERNAL ELEVATIONS,
INSTALLATION OF REPLACEMENT PLANT EQUIPMENT AT ROOF LEVEL AND CONSENT FOR THE
DISPLAY OF ADVERTISEMENTS
65 CLERKENWELL ROAD LONDON EC1R 5BL
LEGAL & GENERAL ASSURANCE (PENSIONS MANAGEMENT) LIMITED**

Introduction

We write on behalf of our client, Legal & General Assurance (Pensions Management) Limited, to apply for planning permission for development at 65 Clerkenwell Road.

The proposed development will comprise a series of physical works linked to the refurbishment of the existing commercial building at the application site in conjunction with its primary use for office purposes. These works are required to facilitate the reoccupation of the building which is currently vacant.

The application also seeks advertisement consent for the erection of signage on the external elevations of the building.

In accordance with the Town and Country Planning (Development Management Procedure) Order 2015, the application comprises the following:

- This covering letter;
- The completed application form and certificates;
- Community Infrastructure Levy form;
- Environmental Noise Survey & Plant Noise Impact Assessment, prepared by Quantum Acoustics;
- Drawing No: 2210 02.18 Rev A – Existing Front + Rear Elevations;
- Drawing No: 2210 02.19 Rev A – Existing Side Elevation;
- Drawing No: 2210 02.20 Rev A – Existing Roof Plan;
- Drawing No: 2210 04.08 Rev B – Proposed Front + Rear Elevations;
- Drawing No: 2210 04.09 Rev C – Proposed Side Elevation;
- Drawing No: 2210 04.10 Rev C – Proposed Roof Plan;
- Drawing No: 2210 04.11 – Existing and Proposed Section BB;
- Drawing No: 2210 04.12 – Existing and Proposed Rooflight;
- Drawing No: 2210 04.13 – Proposed Sedum Roof;

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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- Rooflight Specification Details;
- Exterior Design document, prepared by Cast Interiors;
- OSLO 255 LED Light Fitting Specification Details;

The planning application has been submitted and the requisite fee (£658.00) paid electronically via the Planning Portal (Ref: PP-12388049).

The Application Site

The application site comprises 65 Clerkenwell Road in London, which is a five storey office building (the '**Site**').

The Site area is 0.02ha and the 65 Clerkenwell Road's footprint covers the entirety of the plot. The full extent of the Site is detailed on the submitted Site Location Plan.

The Site is bounded by Clerkenwell Road to the north, 91-93 Farringdon Road is to the east, a service yard is located to the south and Onslow Street bounds to the Site to the west.

The Site does not comprise any statutorily or locally listed buildings. However, the Site is situated within the Hatton Garden Conservation Area and is close to a Grade II* Listed Building titled 'Roman Catholic Italian Church of St Pater and Presbytery'.

The Site is located within the Central Activities Zone (CAZ) as designated by the London Plan. It also has a PTAL Rating of 6b and is well served by public transport and infrastructure for sustainable modes.

The Site is located in Flood Zone 1, which is an area with a low probability of flooding.

Relevant Planning History

On 12 November 1990, planning permission was granted for: '*Change of use from warehouse (B8) to uses within Class B1 of the Town and Country Planning (Use Classes) Order 1987* (App Ref: 9000531) (the **1990 Permission**)'.

On 30 January 2001, a certificate of lawfulness was granted for: '*Application for certificate of lawfulness for proposed use or development for use of 65 Clerkenwell Road as office (Class B1)*.' (App Ref: PSX0104106) (the **2001 Permission**)'.

There have been a series of minor planning permissions granted for minor works in respect of the premises subsequent to the 1990 and the 2001 Permissions.

A planning application for the replacement of the existing windows at the building was submitted in February 2023 but subsequently withdrawn by the Applicant in September 2023 (Ref: 2023/0231/P).

The Proposed Development

The application seeks full planning permission for a series of physical works to refurbish the existing building at the Site in conjunction with its primary use for office purposes.

The proposed works are required to improve the energy efficiency of the building and ultimately facilitate the re-occupation of the building by a new tenant. It is noted that the submission has been informed by consideration of alternative options to achieve the desired sustainability improvements following concerns raised by the Local Planning Authority in respect of the proposed replacement of existing windows which have poor thermal performance.

The individual elements of the physical works that comprise the proposed development are summarised below:

- New flat roof to replace existing structure on like-for-like basis;
- New pitched slate roof to replace existing on like-for-like basis;
- New rooflight to pitched roof to replace the existing on like-for-like basis ;
- New sedum blanket roof to existing flat roof;
- Replacement of existing plant equipment at roof level;
- Installation of 6no louvre panels to rear elevation;
- Installation of 4no cast iron vent covers to side elevation; and
- Installation of 8no external light fittings to front elevation;

Alterations to Roof

The details for the proposed flat and pitched roofs are identified on Drawing No: 2210 04.10 and will comprise like-for-like replacement of the existing structures in terms of profile, materiality and appearance.

A section drawing is provided to demonstrate that the existing eaves and ridge level would be retained in respect of the pitched roof (Drawing No: 2210 04.11).

The pitched roof will be constructed from replacement Welsh Slate tiles and new timber rafters with insulation added to improve thermal efficiencies. It is also proposed to replace the existing rooflight to the pitched roof with a new steel framed version as per the submitted specification.

A sedum blanket roof is proposed adjacent to the existing plant enclosure with details provided on Drawing No: 2210 04.13. It will comprise of a pre-cultivated vegetation blanket installed on top of a screeded substrate deck, filter fleece and drainage board product.

The proposed sedum roof will not be used as an amenity or sitting out space with access to this provided for maintenance purposes only.

Alterations to Elevations

The application proposes the introduction of 6 no. new louvre panels to the rear elevation of the building. These are identified on Drawing No: 2210 04.08 Rev B and are required to enable ventilation to the internal space which is to be proposed to be occupied as office accommodation.

It is also proposed to introduce 4no cast iron vent covers to the side elevation of the building fronting Onslow Street. The location of these is identified on Drawing No: 2210 04.09 Rev C.

The proposed panels and vent covers have been positioned discretely within locations on the least sensitive elevations of the building in order to minimise visibility.

It is noted that the rear elevation of the building has already been established as a location for louvres. The proposed panels to the rear elevation would be coloured to match the adjacent panels in this location and therefore correspond with the approved design, form and materiality of the façade.

Plant Equipment

The application proposes includes the installation of replacement mechanical plant at roof level to comprise:

- 1no Daikin REYA10A condenser unit;
- 1no Daikin REYA12A condenser unit;
- 4no Daikin REYA20A condenser units; and
- 1no Mitsubishi QAHV-N560YA-HPB air source heat pump

The equipment will replace the existing mechanical plant located at roof level and be screened by an existing acoustic barrier which is to be retained as part of the proposals.

The proposed location and configuration of the new equipment and existing acoustic screen is illustrated on Drawing No: 2210 04.10 Rev C.

It is noted that the 4no Dakin REYA20A condenser units are required to be fitted with bespoke vertical attenuators for these to accord with plant noise emission criteria. The proposed acoustic hoods will sit above the height of the existing plant screen but will not be visible in the street scene on account of the equipment being set back from the edge of the building. It follows that the proposed equipment will not materially alter the appearance of the building or detract from the character and appearance of the conservation area.

As set out above, the application submission has been informed by consideration of alternative energy efficiency options following concerns raised by the Local Planning Authority in respect of the proposed replacement of existing windows.

The proposed plant selections have been made to ensure that the units cater to the energy efficiency and comfort cooling requirements for the building. Specifically, the Dakin REYA20A units employ R-32 refrigerant, characterised by a lower global warming potential (GWP) when compared with other commonly employed refrigerants. This aligns with the buildings aspirations of invigorating a largely energy inefficient asset and converting it into an operationally Net Zero Carbon building in line with government targets.

External Lighting

The proposed development scheme includes a series of light fittings to be installed on the front elevation. These principally comprise of decorative wall mounted lights affixed to the external façade and are illustrated on the proposed elevation drawings. In some cases, these represent like-for-like replacement of existing light fittings.

The location of the proposed light fittings are illustrated on Drawing No: 2210 04.08 with detailed specifications also set out in detail on the luminaire datasheets submitted as part of this application. The fittings can be summarised as below:

- 4no OSLO 255 LED surface mounted aluminium fittings to measure 110mm x 90mm x 255mm; and
- 4no Lighteze LED surface mounted linear fittings to measure 1500mm x 78mm x 38mm

The wall mounted fittings would provide illumination to the façade in a neat and considered manner and distribution will have minimal effect on neighbouring and adjacent buildings. It is noted that surrounding buildings at 67 Clerkenwell Road, 124-132 Clerkenwell Road (The Bryson Hotel) and Hatton House benefit from similar external light fittings.

External Signage

This application also seeks for advertisement consent for the display of 2no projecting signs on the front and side elevations of the building.

The proposed signs seek to replace existing signage located on the Clerkenwell façade and will refer to the address for the building. It follows that this is essential to provide a level of commercial presence and assist with orientating their way into and around the Site.

The existing signage to be removed from the front elevation is illustrated on Drawing No: 2210 02.18 Rev A and comprises 3no projecting signs and 1no fascia sign. The existing projecting signs include a backlit panel and have the ability to be illuminated.

The locations of the proposed signs are illustrated on Drawing No: 2210 04.08 with further detail provided within the submitted Exterior Signage and Lighting document, prepared by Cast Interiors.

The proposal comprises signage which is appropriate having regard to the established role and commercial function of the Site. The proposed signage is of an appropriate scale having regard to the established appearance of the building and is sensitive and respectful of the wider local context and Hatton Garden Conservation Area.

The proposed method and level of illumination has been chosen to ensure there is no unacceptable impacts from the proposed signage. It is noted that the neighbouring building at 67 Clerkenwell Road and the adjacent Bryson Hotel also include similar external light fittings

As set out above, the primary objective is to address the deficiencies with the condition of the existing building with a view to facilitating its re-occupation following a period of vacancy.

The works will refurbish, modernise and enhance the appearance of the existing building. The majority proposed works are necessary to enhance the energy rating of the building improve its thermal performance, delivering operational sustainability benefits by reducing the consumption of energy.

Assessment of the Proposed Development

The statutory development plan for the Site consists of the London Plan 2021 (adopted March 2021) and Camden Local Plan 2017 (adopted July 2017) (the '**Local Plan**').

Below we assess the proposed development against the relevant local policies that comprise the development plan and the national planning policies contained within the National Planning Policy Framework ('**NPPF**') where appropriate.

Principle of Development

The NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt (paragraph 81).

At the strategic level, London Plan Policy SD4 supports the office functions of the Central Activities Zone (CAZ) and particularly the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. Commercial development of the type proposed at the Site is expressly supported within the CAZ.

The proposal seeks to refurbish the existing floorspace to enhance the office function at the Site. The current office floorspace is of low quality and does not meet the requirements of many businesses seeking accommodation in this locale.

Camden Local Plan Policy E1 states that the Council will secure a successful and inclusive economy by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. This includes supporting proposals for the intensification of existing employment sites and premises.

Furthermore, Camden Local Plan Policy E2 seeks to maintain and enhance the quantum and quality of employment floorspace within the borough to support the function of the CAZ.

The proposed works to refurbish and upgrade the existing building will significantly improve its energy efficiency levels and facilitate its reoccupation for the longer term. This will deliver significant benefits in terms of economic growth, productivity and job and wage creation given the floorspace is currently vacant.

Overall the proposals will deliver improvements to the office building, securing the long term future of the building and contributing to the enhancement of the quality of employment space within the borough. This fully accords with the NPPF, London Plan and Camden Local Plan.

Design and Heritage

As set out above the Site is located within the Hatton Garden Conservation Area.

The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 126 states that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people.

With regard to heritage assets, Paragraph 187 of the NPPF notes that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal.

When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF requires great weight to be given to the asset's conservation.

The adopted local planning policy frameworks seek to preserve and enhance the Conservation Areas and heritage assets within the Borough.

Policy SD4 of the London Plan seeks to sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components and other features including distinctive buildings and historic heritage.

Camden Local Plan Policy D1 seeks to ensure high quality design in development, which respects local context, preserves or enhances the historic environment and heritage assets, is sustainable in design and construction, and incorporates high quality landscaping.

In particular, applicants are required to demonstrate how sustainable design principles and measures have been incorporated into designs, utilising environmental performance standards.

Policy D2 has regard to heritage assets and stipulates the Council will require that development within conservation areas to preserve, or where possible, enhance the character and appearance of the area.

The proposed development has been developed with the quality of the design, in terms of both appearance and functionality at its centre. In particular, the physical works are entirely appropriate having regard to the existing appearance of the building at the Site and those within the immediate surroundings.

Policy D4 'Advertisements' states that design of signage needs to preserve or enhance the character of their setting and host building. The Council's Design SPD (published 2021) states that proposed signage should relate to the character, scale and architectural features of the building.

The proposed signage is in keeping with the established role and commercial function of the building and is of an appropriate scale having regard to the extent of the facade and wider local context. It is also noted that the proposed signage will replace existing signage at the building and therefore the location and scale of this is already established.

It follows that the development will preserve the character and appearance of the building and Hatton Garden Conservation Area in which it is located.

Sustainability

One of the core planning principles of the NPPF is to support the transition to a low carbon future in a changing climate through encouraging the reuse of existing resources, including conversion of existing buildings.

London Plan Policy SI 2 requires development proposals to minimise carbon dioxide emissions in line with the energy hierarchy: 1) be lean (use less energy); 2) be clear (supply energy efficiently); 3) be green (use renewable energy).

Camden Local Plan Policy CC1 the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

Policy CC2 further states all development should adopt appropriate climate change adaptation measures such as incorporating bio-diverse roofs.

In 2019, Camden Council declared a climate and ecological emergency. This has informed the development of the Climate Action Plan 2022-2025 which outlines a series of objectives (including for buildings to be energy efficient, comfortable and fit-for purpose) to achieve net zero carbon by 2030.

The proposed development will deliver a significant improvement in the overall energy efficiency and sustainability at the Site. This includes measures to improve the thermal performance and comfort cooling requirements of the building for the benefit of future occupiers.

The application also proposes the introduction of a sedum roof which will directly accord with the objective of Local Plan Policy CC2 to deliver ecological enhancements.

It follows that the proposed development accords directly with the strategic aspirations of the development plan and the NPPF which all target improvements to move towards a 'low carbon' future.

Amenity

Camden Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours and states the Council will grant permission for development unless this would cause unacceptable harm to amenity.

The existing building is in commercial use and the prevailing contextual character of the site is predominantly commercial. It is acknowledged there are some sensitive receptors in the immediate vicinity, namely the Ziggurat Building, which is located approximately 25m from the plant enclosure.

Within the existing enclosure, the existing plant will be removed and replaced with new units that will more efficiently provide the same function.

An Environmental Noise Survey & Plant Noise Impact Assessment has been prepared by Quantum Acoustics in support of this planning application. The report is informed by a background noise survey undertaken in February 2023 and confirms that all plant items will comply with the required criteria with the proposed mitigation.

Summary and Conclusion

This application seeks planning permission for minor physical works to the roof and external elevations and advertisement consent at 65 Clerkenwell Road.

The proposed physical works are minor in nature and will not materially alter the appearance of the building. The works will not alter the structure of the building and as such will retain the established appearance of the elevations in the wider street scene.

The proposal does not conflict with any of the relevant policies in the development plan and as such, we respectfully request that this application is approved and that planning permission is granted.

We trust that the information provided above and on the enclosed drawings is sufficient for the Council to register and consider this application. We will endeavour to contact you within the next few days to establish your timetable for decision making.



If you have any queries regarding the above or require any further information, please do not hesitate to contact Heloise Whiteman or Chris Moore at these offices.

Yours faithfully,

A handwritten signature in grey ink, which appears to read "Savills", positioned above the company name.

Savills (UK) Limited
Planning