

KS/FC/P23-1764

03 January 2023

Development Management  
London Borough of Camden  
Camden Town Hall Extension  
Argyle Street  
London  
WC1H 8EQ

Dear Sir/Madam,

**Town and Country Planning Act 1990 (as amended)**  
**Ragged School, 18 Vine Hill, London, EC1R 5DZ**  
**Planning Application for External Rooftop Plant**  
**Planning Portal Ref: PP-12626566**

Lotus Technology Innovative Limited ('the Applicant') seek to submit a full planning application for the following development at Ragged School, 18 Vine Hill, London, EC1R 5DZ ('the site'):

*"Extension of existing rooftop plant enclosure at second floor level and installation of new external plant equipment to roof."*

Accordingly, the following documentation has been submitted via the Planning Portal (ref. PP-12626566):

1. Application Form;
2. CIL Form;
3. Architectural drawings, prepared by Modus Workspace Ltd:
  - a. Site Location Plan (ref. I- PL- 080- 01 Rev A);
  - b. Site Plan (ref. I- PL- 081- 01 Rev A);
  - c. Existing Roof Plans and Elevations Sheet 1 (ref. I- PL- 0282- 02 Rev A);
  - d. Existing Roof Plans and Elevations Sheet 2 (ref. I- PL- 0283- 02 Rev A);
  - e. Demolition Roof Plans and Elevations Sheet 1 (ref. I- PL- 0284- 02 Rev A);
  - f. Demolition Roof Plans and Elevations Sheet 2 (ref. I- PL- 0285- 02 Rev A);
  - g. Proposed Roof Plan and Elevations Sheet 1 (ref. I- PL- 0286- 02 Rev B);
  - h. Proposed Roof Plans and Elevations Sheet 2 (ref. I- PL- 0287- 02 Rev B);
4. Planning Assessment (included within this letter);
5. Heritage Assessment (included within this letter);
6. Noise Impact Assessment, Revision 1, prepared by Quantum Acoustics; and
7. Sustainability Details (included within this letter).

21 Ganton Street, London, W1F 9BN  
T 020 3897 1110 E [London@pegasusgroup.co.uk](mailto:London@pegasusgroup.co.uk)  
Offices throughout the UK and Ireland.

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Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire GL7 1RT

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Payment of the requisite planning application fee of £462 will be made to the Council under separate cover.

### Site Description

The application site comprises the existing external plant enclosure at second floor level to the north of the Ragged School building at 18 Vine Hill, together with the flat rooftop plant area at third floor level to the south. The building itself extends to part three / part four storeys plus lower ground, and has recently been refurbished and extended as part of a wider redevelopment including erection of an 8 storey mixed-use hotel building to the east fronting Eyre Street Hill.

The application site comprises Class E office floorspace which has been reconfigured internally as part of the wider approved works.

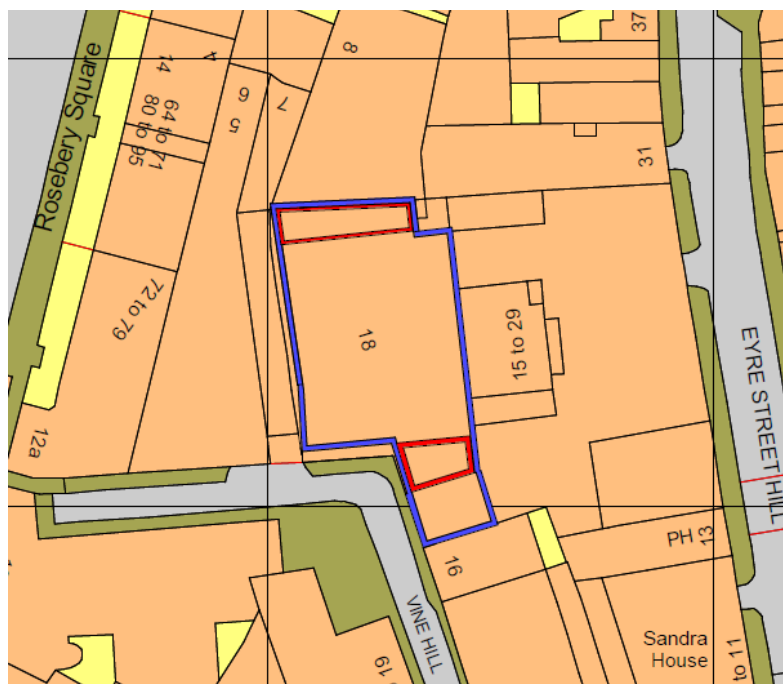


Figure 1 – Extract of Site Location Plan

The surrounding area comprises a variety of commercial (mainly office) and residential uses, with the new hotel immediately to the east of the site. Clerkenwell Road features a number of food and drink uses at this part, with a restaurant and pub adjoining the entrance to Vine Hill.

The site is located within Hatton Garden Conservation Area. The building is not statutory listed or locally listed.

According to the Environment Agency's Flood Map, the site lies wholly within Flood Zone 1 which indicates a 'low' probability of flooding.



## Planning History

A search of the Council's online planning records has revealed numerous applications on the site relating to the refurbishment and extension of the office accommodation at the application site at 18 Vine Hill and associated mixed use redevelopment of the adjoining site at 15-29 Eyre Street Hill. The following applications are of relevance to the proposal:

**2018/6016/P** – *Erection of an 8 storey building comprising a 153 bed hotel (Class C1) with ancillary ground floor restaurant/cafe facilities (Class A3) and 9 flats (5 x 1 bed and 4 x 3 bed) (Class C3), excavation works to enlarge the lower ground floor level and create a lift pith, following demolition of the existing rear annex and garages at 18 Vine Hill, together with refurbishment of 18 Vine Hill and the erection of a 3 storey extension to provide additional office accommodation (Class B1(a)), hard and soft landscaping and other associated works. Granted 2 January 2020*

**2020/0985/P** – *Alteration to ramps and stairs in office entrance, WC facilities to upper floor, alteration to lower ground change facilities of office, installation of mezzanine level in office at fifth floor, reconfiguration of hotel rooms to provide an additional 7 rooms to be 153, ground floor reconfiguration of front of house and back of house facilities in hotel and introduction of partition wall to 3 bed units to separate living and kitchen/dining areas of planning permission 2018/6016/P dated 02/01/2020. Granted 4 June 2020*

**2020/0984/P** – *Variation of condition 2 (Approved Plans) of planning permission 2018/6016/P dated 02/01/2020, namely alterations to the hotel to reduce height of building by 900mm, amend pre-cast concrete panels to glass reinforced concrete panels, reconfigure PV panels on roof, and revise ventilation strategy for hotel rooms on Eyre Street Hill; alterations to the office building to relocate plant to 2nd floor external terrace with installation of associated plant enclosure, alter back of house layout, increase number of WCs and form new fire escape from stair core. Granted 5 March 2021.*

**2022/5115/P** – *Amendments (changes to door and window details) planning permission 2020/0984/P dated 12/01/2021 which itself varied 2018/6016/P dated 02/01/2020. Granted 17 July 2023.*

## Proposed Development

This application seeks planning permission in order to facilitate occupation of the newly refurbished site at 18 Vine Hill by the intended Class E office operator. During detailed design considerations, the operator has identified a need for additional plant equipment. Therefore the application specifically seeks planning permission for the following:

### Northern Rooftop Plant Area

- Extension of existing external plant enclosure at second floor level to accommodate 2no. additional condenser units; and



- Replacement of 1no. existing condenser unit with 1no. new unit within existing plant enclosure.

#### Southern Rooftop Plant Area

- Installation of 3no. new condenser units to flat roof plant area.

### **Planning Policy**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The adopted Development Plan for the London Borough of Camden Council comprises the Local Plan (2017) and the London Plan (2021).

Other material considerations that are relevant to the application proposals include the National Planning Policy Framework (NPPF) (2023), and relevant supplementary planning documents and guidance.

The key policies relevant to this application are outlined below.

#### Camden Local Plan (2017)

**Policy D1 'Design'** states that the Council will seek to secure high quality design in development. The Council will require that development respects local context and character, comprises details and materials that are of high quality and complement the local character, integrates well with the surrounding streets and contributes positively to the street frontage, and carefully integrates building service equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

**Policy A1 'Managing the Impact of Development'** outlines that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

**Policy A4 'Noise and Vibration'** outlines that the Council requires developments to have regard to Camden's Noise and Vibration Thresholds set out in Appendix 3. The Council will not grant planning permission for developments likely to generate unacceptable noise and vibration impacts. Permission for noise generating development, including any plant and machinery, will only be granted if it can be operated without causing harm to amenity.

**Policy D2 'Heritage'** states that the Council will require development within a Conservation Area to preserve or, where possible, enhance the character or appearance of the area.



## Supplementary Documents: Camden Planning Guidance (CPG)

CPG 'Amenity' (January 2021) states that an acoustic report should accompany an application proposing plant, ventilation, air extraction or conditioning equipment and flues.

### **Planning Assessment**

This application seeks planning permission for the installation and replacement of plant to the roof, including the extension the existing plant enclosure at second floor level of the office building. The proposals are relatively minor in nature and scale, and will facilitate occupation of the newly refurbished offices at 18 Vine Hill.

Careful consideration has been given to the scale, siting, and detailed design of the proposed plant to ensure that the proposal will respect the character and appearance of the host building and the surrounding area and will not cause harm to amenity, in accordance with Policy D1 and A4 of the Local Plan and Camden Planning Guidance 'Amenity'.

### *Design*

The proposal seeks the extension of the existing plant enclosure to the second floor roof of the northern part of the building in order to accommodate additional necessary plant (2no. new condensers) which is required to facilitate occupation by the intended office operator; as well as replacement of 1no. condenser within the existing enclosure.

The existing plant enclosure was permitted through planning permission 2020/0984/P which sought to relocate plant equipment from within the building to the second floor roof terrace that serves the offices.

The scale and nature of the alterations to the enclosure is minor, particularly when viewed in the context of the scale of the wider 4 storey host building, as evident from Proposed Northern Elevation (Image No.4) on the submitted Proposed Roof Plans & Elevations Drawing Sheet 1.

The enclosure will only be extended to the minimum size possible to accommodate the required 2no. additional condensers and associated access. The proposed extension of the plant enclosure will result in a modest reduction of the office roof terrace area of only circa 8 sqm, with the vast majority (some 69 sqm) of office roof terrace remaining.

The height of the enclosure will remain the same as the existing, ensuring consistency to that approved, and will continue to sit behind the parapet of the terrace. The new part of the enclosure will also utilise the same high quality charred larch material as existing which will maintain consistency in appearance of the enclosure. The 2no. new condenser units will be sited comfortably below the enclosure, ensuring they are screened from view.

Public views of the enclosure will be very minimal, if possible at all, given the height of the enclosure and setback of it to the northernmost part of the building, away from Vine Hill to the south. The



enclosure will be visible in some private views, but its appearance will not alter significantly from the existing approved enclosure by reason of its modest scale and detailed design as set out above.

Of note, Informative 2 of planning permission ref. 2020/O984/P sets out the reasons for granting the existing plant enclosure, stating *"There would be some visibility of the plant from private views from residential properties to the north and west and also from the proposed units in the affordable block to the east, but it would sit lower than the second floor and would not appear as a bulky or incongruous addition to the roofscape"*.

The proposed extension of this enclosure will similarly benefit from its siting well below the main roofline of the building and its very modest scale and detailed design will ensure it appears a visually cohesive and congruent addition. As such the proposal will respect the character and appearance of both the host building and surrounding area in accordance with Policy D1 of the Local Plan and should be similarly supported.

In addition to this, an existing condenser within the existing northern plant enclosure is proposed to be replaced by a new condenser, in the same location. The replacement condenser is the same height and depth as the existing, but smaller width and weight. As such, it will remain below the existing plant screen and it will not result in any greater visual impact than the existing condenser it seeks to replace.

In respect of the southern plant area, 3no. new condenser units are proposed to the rooftop plant area to the south of the building. Plant equipment is well established in this location, having been accepted through planning permission ref. 2018/6016/P for the wider scheme. The additional condenser units will be in keeping with the plant equipment already present in this location, as shown on the submitted roofplans.

This rooftop plant area benefits from parapets to both the east and west elevations (see below photo of west elevation). The condensers will both be sited below the parapet, thereby screening the plant from public views from the street as well as further minimising any private views. Where private views are possible, the proposed condensers will be viewed in context with the surrounding plant and be in keeping with the appearance of this area. As such the proposal will respect local context and character in accordance with Policy D1 of the Local Plan.

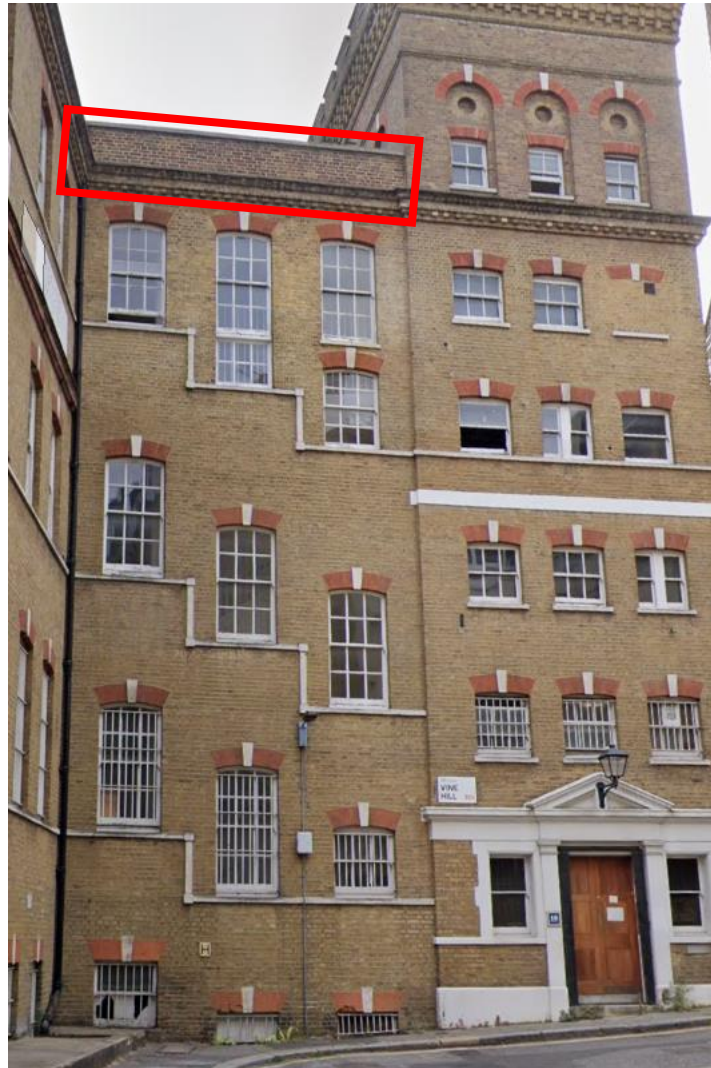


Figure 2 – Image showing parapet (outlined red) on the western elevation (Vine Hill) which serves the southern rooftop plant area, behind which 3no. new condensers will be sited

### *Amenity*

As stated above, the surrounding area comprises a variety of uses including commercial (mainly office) uses, as well as residential to the north and west, the new hotel and flats immediately to the east of the site, and flats to the south at 16 Vine Hill. The submitted Noise Impact Assessment identifies the nearest noise sensitive receptors to the proposed new plant equipment as that on Roseberry Avenue and at 22 Vine Hill.

A Noise Impact Assessment has been submitted in support of this application which demonstrates that the proposed plant will accord with the noise requirements of Conditions 17 and 33 of





operative permission ref. 2020/O984/P, and as such there will be no adverse impact on amenity arising from the proposal in accordance with Policies A1 and A4.

### **Sustainability**

Policies CC1 and CC2 of the Local Plan as well as Camden's Energy Efficiency and Adaptation Planning Guidance (2021) indicates that development should be resilient to climate change and is expected to minimise carbon dioxide emissions by following the energy hierarchy. It should be noted that this proposal merely seeks a very minor amount of additional plant equipment to the existing established plant areas. Notwithstanding this, sustainable design principles have been incorporated into the development.

The proposal includes the replacement of 1no. condenser and installation of 5no. additional new condenser units across the site to provide adequate air conditioning to the office accommodation at 18 Vine Hill. It should be noted that active cooling has already been accepted to serve the newly refurbished development, however following further consideration during the detailed design stage, new units are required to meet the operational requirements of the intended occupier.

In respect of the cooling hierarchy, energy efficiency measures proposed within the wider redevelopment for which permission was granted will continue to be benefitted from. This includes energy efficient design such as energy efficient lighting, and passive ventilation measures such as openable windows.

### **Heritage Assessment**

As the site falls within the boundaries of the Hatton Garden Conservation Area, the proposals have the potential to impact its character and appearance. This section will assess the significance of the Conservation Area, including any contribution the site makes to that significance, as well as the impact of the proposals on that significance.

The Hatton Garden Conservation Area was first designated in 1999. A Conservation Area Appraisal and Management Plan was adopted on 12<sup>th</sup> September 2017. The Appraisal summarises the character as follows:

*"The character of the Area is varied, with no single period, style or use predominating. Yet, there is a conspicuously high proportion of Victorian former warehouses and twentieth-century commercial buildings, and a smattering of Georgian houses, all of which are the direct result of the history of the Area. Today there are a mix of uses, especially commercial and residential."*

The Appraisal goes on to describe the activities within the Conservation Area, both historically and currently, and how they contribute to its character and appearance.

The significance of the Hatton Garden Conservation Area is principally derived from those elements of its intrinsic character and appearance detailed in the Appraisal. These comprise aspects of its historic layout and street patterns, historic built form and limited green spaces, all



of which contribute to the combined historic, architectural, artistic, and archaeological interest of the designation area. Most of these interests can be better appreciated as part of key views within and towards the designation area.

Given the variety of characteristics, the Appraisal subdivides the Conservation Area into various character areas. Sub-area 1: Rosebery Avenue includes the application site and is described as follows:

*“Spatial character*

*5.3 Sub-area 1, in the northern part of the Area, forms a dense pattern of short, narrow, hilly streets, contained within a framework of three major thoroughfares: Gray’s Inn Road, Rosebery Avenue and Clerkenwell Road. The complex medieval street plan, cut through by these three nineteenth-century roads, creates surprising vistas and transitions in the townscape that are integral to the character. There are many curving or angular plot boundaries and there are also interesting changes in level. For example, it is possible to turn off the broad, tree-lined Rosebery Avenue, descend steep steps and find yourself in Vine Hill, a narrow lane with a strong sense of enclosure.*

*Architectural character*

*5.4 Much of Sub-area 1 has a strongly defined architectural character derived from its large and impressive late nineteenth-century housing blocks. These include austere ‘model dwellings’ in London stock brick (e.g. Cavendish Mansions, Clerkenwell Road; Positive) and more decorative mansion blocks in red brick with stucco ornaments (e.g. Churston, Dawlish, Dulverton and Tiverton Mansions on Gray’s Inn Road; Positive). There are also several large industrial buildings of similar or later date, including Panther House, grouped around a secluded courtyard off Mount Pleasant (Positive), and Herbal House (Positive), a monumentally treated former print works on Herbal Hill and Back Hill. As a result the overall architectural character is robust and strongly articulated though not highly decorative. The irregular street pattern has created many wedge-shaped sites that some of the best buildings turn to advantage, e.g. 144 Clerkenwell Road (Positive), which sweeps round dramatically into Back Hill. Red brick and London stock brick are the predominant materials.”*

The application site is at the northern end of Vine Hill and terminates the view down Vine Hill from Clerkenwell Road. This area mainly comprises the larger former warehouses, schools or mansion blocks from the Victorian/Edwardian area and has a secondary appearance by virtue of the restrained architectural detailing and secondary thoroughfare. The application site is a former school, having been constructed in 1878/9 as the “Ragged School” for homeless people, and has an overtly Victorian appearance with the historic entrance on the eastern side of Vine Hill. Given the retention of this detailing and the legibility of its former use as a school, the building is considered a positive contributor to the wider Conservation Area. This is confirmed in the Appraisal.



### *Impact Assessment*

The proposals include the installation plant equipment at roof level adjacent to the Ragged School tower, and on the northern side of the Ragged School. The acceptability of plant in these locations were established in permission refs. 2018/6016/P and 2020/0984/P and the current proposals will not fundamentally change the use or appearance of these areas, which are already sensitively screened.

The extension of the existing external plant enclosure at second floor level to accommodate 2no. additional condenser units will extend the enclosed area into the northwestern corner of the terrace that serves the offices; however, it is clear that this area has an ancillary appearance with no historic features of note, by virtue of the modern alterations that were undertaken as part of the recent redevelopment.

Public views of the enclosure will be very minimal, if possible at all, given the height of the enclosure and setback of it to the north. Consequently the extension of the screen will not be appreciable from any locally important views, such as down Vine Hill. Whilst private views may experience this change, it will only be slight, given the established presence of the enclosure screen and plant already. The overall character of the townscape and the spaces between will still be appreciable.

Similarly, the proposals to the southern plant area, to the north of the Ragged School tower, include the addition of 3no. condensers. Given the narrowness of the streets and the height of the Ragged School and other buildings, these changes will also not be perceived from the public realm. Again, private views may experience the change, but this will be very minor and in the context of the existing plant equipment. Overall, the application site will retain its positive contribution to the surrounding Conservation Area as key characteristics and elements of the building will not be affected by the proposals.

With reference to the levels of harm in the NPPF, the proposals will result in 'no harm' to the significance of the Hatton Garden Conservation Area. Thus, the proposals will fulfil the statutory requirement set out in Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant local policies.

### **Conclusion**

The proposed development will facilitate occupation of the newly refurbished office premises and will wholly comply with local and national policy.

The proposed development will be minor in nature and scale. Notwithstanding this, it has been carefully designed to be of a high-quality appearance which will respect the character and appearance of the host building and the surrounding area, taking into consideration the significance of the Hatton Garden Conservation Area. The proposals have been demonstrated to result in 'no harm' to the significance of the conservation area. There will be no adverse impact on visual amenity or public safety by reason of the careful scale, siting, and detailed design of the proposed canopy and sign.



The proposal will therefore accord with Policies D1, D4 and A1 of the Camden Local Plan, as well as Supplementary Guidance, and the NPPF.

I trust the above and enclosed is sufficient for the registration of this application. If you require any further information, please do not hesitate to contact me or my colleague Kate Simpson ([Kate.Simpson@pegasusgroup.co.uk](mailto:Kate.Simpson@pegasusgroup.co.uk)).

Yours faithfully,

Fiona Campbell

**Planner**

[Fiona.Campbell@pegasusgroup.co.uk](mailto:Fiona.Campbell@pegasusgroup.co.uk)