

7 August 2018
By Email

London Borough of Camden
Development Management
Regeneration and Planning
London Borough of Camden
Judd Street
London
WC1H 8ND

Application ref. 2018/2424/NEW

For the attention of: Obote Hope

Dear Sir

Planning application for:

**Part change of use of ground floor from healthcare use (Class D1) to offices (Class B1), first floor rear extension with roof terrace, alterations to lower ground, ground and first floor rear elevation, and installation of first floor roof top plant
49-51 Farringdon Road, London, EC1M 3JP**

On behalf of our client, Andrew Kirk Management Ltd, we enclose a planning application for the above development. The application comprises:

- This covering letter.
- Planning application forms including completion of Certificate A.
- Drawing ref. (00)-001 rev P1 – Site Location Plan.
- Drawing ref. 239-100 rev D – Existing Lower Ground Floor Plan.
- Drawing ref. 239-101 rev D – Existing Ground Floor Plan.
- Drawing ref. 239-102 rev D – Existing First Floor Plan.
- Drawing ref. 239-203 rev D – Existing Rear Elevation.
- Drawing ref. (P)-099 rev P2 – Proposed LGF Plan.
- Drawing ref. (P)-100 rev P2 – Proposed GF Plan.
- Drawing ref. (P)-101 rev P2 – Proposed 1F Plan.
- Drawing ref. (P)-102A rev P2 – Proposed First Floor Roof Level to Rear.
- Drawing ref. (P)-450 rev P2 – Proposed Light Well Elevation & Section.
- Noise Assessment dated July 2018, prepared by Cass Allen.

We have made electronic payment of the application fee of £924 (based on the proposed floorspace of 124 sqm GEA). Please acknowledge the valid receipt of the application and fee as soon as possible.

This application is submitted following planning permission being granted on 14 December 2017 (ref. 2016/6194/P) for:

“Internal and external alterations, extensions and reconfiguration of building to provide a replacement roof extension at fifth floor level; a first floor rear extension; internal reconfiguration and extension of

retail (A1), healthcare (D1) and office (B1a) uses with an overall uplift of 115sq.m (GIA); restoration of facade and upgrading of shopfront; alterations to rear elevation and associated additions/alterations."

The permission was granted subject to four conditions (dealing with period for commencement, list of approved drawings, detailed drawings and samples of various details to be submitted, provision of cycle parking) and a S106 agreement (dealing with construction management plan, employment and training, highways contribution, local procurement).

The site owner now requires a number of amendments to be made to the scheme due to changes in circumstances, previous oversights, and design refinement. The required amendments are being progressed via this application that addresses matters at lower ground floor to first floor levels, and a separate non material amendment application that seeks to deal with matters at fifth floor level and above.

The enclosed application seeks to make four key changes to the previously approved scheme, as described in turn below.

To assist officers in their consideration of matters, in addition to the submitted application plans, we also attach to this letter copies of relevant approved plans from application ref. 2016/6194/P.

Use of Lower Ground and Ground Floors

The building is currently vacant, with an area of the ground floor recently used as a dentists (Class D1) (vacated in May 2018) and a small snack bar cafe (Class A1), with office accommodation on floors one to five and the lower ground floor previously used as ancillary space to the offices above. The ground floor was also once office accommodation but converted to a dental surgery through permission ref. 2006/4256/P granted in November 2006.

The latest approved scheme as granted in December 2017 included for the relocation of the dental surgery to lower ground floor level with a resulting slight increase in floorspace given over to D1 use, with the ground floor then accommodating an enlarged A1 unit and the rest as office space. Objections were made to the application by the dental surgery and some of its patients, due to the proposed relocation from ground to lower ground floor, but these concerns are now historic, particularly for the reasons set out in the below paragraph.

Unknown to the owner of no.49-51 until late in the day, and after planning negotiations had concluded with Camden, the dentist (Dr Talati of Malmin Dental) had decided to move into new space next door at 47 Farringdon Road under permission reference 2017/1480/P, dated 18/4/17. The new surgery opened in May 2018. The space taken is 269sqm NIA spread between ground floor (130sqm) and basement (139sqm), replacing the previous A1 use.

The D1 floorspace at 49-51 that Malmin Dental once occupied was 232sqm NIA with this figure being slightly higher than the permitted change of use granted in 2006 through a small extension to the rear and taking in some previous common areas (208sqm was the 2006 permitted floor area).

To clarify, the current D1 space in 49-51 is not 284sqm as quoted in my client's 2017 application (as this incorrectly used this figure for the D1 space when in fact it was the total ground floor GIA area). Our latest measurements confirm the floorspace figure of 232sqm as quoted by Dr Talati in his application at no.47, as his existing space at 49-51.

In light of this clear change in circumstances since the Dec 2017 approval, with alternative, similar dental provision provided next door at no.47, we now propose to change the majority of the ground floor

D1 space at 49-51 to B1 offices, with a small amount going towards enlarging the A1 retail unit currently on site from 31sqm to 43.7sqm. The lower ground floor that was previously going to accommodate the dental surgery will now be retained as B1 space, but very much improved, as to date its only ever been used as poor quality ancillary space for the offices above.

Overall there will be no loss of D1 use, as the 232sqm of D1 space once located within no.49-51 has been replaced by 269sqm at no.47 (in fact an increase of 16%). As well as there being more floorspace, there is also an increase in the number of treatment rooms from six to eight.

Therefore there will be no loss of dental services or D1 space in the area with directly comparable and alternative provision (same dentist and indeed more Class D1 floorspace and treatment rooms) provided next door. Furthermore the ground floor of no 49-51 is simply reverting back to the predominate office use it was in prior to 2006.

The relevant policy test is policy C2 and the above would entirely satisfy criteria g)i). The policy states:

"The Council will....

g) ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met:

i) "a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users...."

Finally, in terms of considering the general level of D1 space along this part of Farringdon Road, it's also relevant to note that no. 53 is also in D1 use, following a change of use granted in 2002 from B1 to D1 for the entire building of 443sqm (ref. 2012/0730/P). This means there are currently four buildings in a row (including 49 and 51) with large areas demised to D1, including at street level.

The change of use of the ground floor of no.49-51 should be seen as acceptable, as the use is simply reverting back to what it once was (offices), a replacement facility has been provided next door (as per policy C2), there will remain D1 uses either side of no. 49-51, and new high quality office space will be provided.

First Floor Rear Extension and Rear Elevation Alterations

A first floor rear extension to the rear of no.49 is proposed as previously. The only changes proposed now is that the height is reduced by 200mm to help accommodate plant on its roof and the depth of the extension is reduced, in order to leave a wider light well to the rear and to facilitate a small rear terrace. The roof terrace will be located at a level below the office windows facing the site to the rear.

Associated with these changes, the existing first floor extension to the rear of no.51 is also proposed to be reduced in its depth to provide an enhanced lightwell and a consistent rear façade with no.49. In addition, both 49 and 51 are reduced in their depth at lower ground floor and ground floor levels to provide for the enhanced rear lightwell.

The enlarged lightwell is required to help provide as much light as possible to the lower ground floor offices, combined with the fact that the four rooflights previously proposed to the first floor roof are no longer proposed. This change is partly to facilitate the location of plant on the first floor roof.

The overall change in floorspace is 80 sqm GIA, given the lower ground and ground floor and part first floor cut backs (minus 25 sqm GIA), and the first floor rear extension to no.49 (plus 105 sqm GIA).

Proposed Plant

The approved December 2017 scheme did not make any provision for plant with this being an oversight at the time. Plant is required in order to serve the new and refurbished office space on all floors. The proposed plant comprises four double condenser units, three single condenser units and a ventilation extract to be located at first floor roof level at the rear of the building. The plant will be located in two locations on the new first floor roof. Both plant areas will be enclosed to the sides by acoustic louvres 2m high. The parapet to the roof will be 400mm meaning the plant enclosures will appear 1.6m in height.

An acoustic assessment supports the application, which builds into its analysis the proposed mitigation in the form of the acoustic screens to ensure the required acoustic criteria of Camden are met. The criteria to be met has been discussed with Nick Priddle at Camden Environmental Health.

Concluding Comments

We believe the amendments being sought are reasonable and appropriate in all respects, assisting the landowner in bringing forward the scheme that ultimately will bring a building in need of investment back into full productive office use.

The change of use and design amendments sought comply with relevant Camden policy and there are no material considerations that indicate that planning permission should not be granted. The development comprises sustainable economic development and should be approved without delay.

If approved, the approved drawings under this application should be read alongside the approved drawings under ref. 2016/6194/P, with the following being superseded by the corresponding drawings in this submission.

- Drawing ref. 239-300 rev M – Existing Lower Ground Floor Plan.
- Drawing ref. 239-301 rev M – Existing Ground Floor Plan.
- Drawing ref. 239-302 rev J – Existing First Floor Plan.

All other approved drawings from ref. 2016/6194/P remain current but do need to be read alongside those permitted under this application where changes are made at the lower floor levels to the rear.

We look forward to discussing the application with you in due course. In the meantime should you have any queries or require any further information, please do not hesitate to contact Nick Jenkins.

Yours faithfully



Nick Jenkins MRICS
Director