

Planning and Heritage Statement

21 Farringdon Road, London EC1M 3HA

Iceni Projects Limited on behalf of AGA Rangemaster Commingled

February 2022

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1. INTRODUCTION

- 1.1 This Planning and Heritage Statement is submitted to the London Borough of Camden ('the Council') on behalf of AGA Rangemaster Commingled ('the Applicant') in support of an application for full planning permission at 21 Farringdon Road, London EC1M 3HA ('the Site').
- 1.2 The application seeks full planning permission for:

Replacement cladding on the front elevation and façade upgrades.

- 1.3 This Planning and Heritage Statement has been prepared by Iceni Projects Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels, together with other material considerations.
- 1.4 This application has been submitted to resolve current fire safety issues with the building, with the front elevation containing non-compliant insulation and a lack of fire barriers, which no longer meets relevant fire safety standards. The Applicant is therefore seeking to re-clad the building to solve this issue in the wake of the recommendations from the Grenfell Fire Inquiry. Alongside the re-cladding of the façade, opportunities are also being taken to improve the appearance, legibility and overall quality of the building.

The Submission

- 1.5 This Planning and Heritage Statement should be read on conjunction with the other documents submitted in support of this planning application: These documents comprise:
 - Planning Application Forms and Certificate of Ownership, prepared by Iceni Projects
 - CIL Form, prepared by Iceni Projects
 - Planning Statement, prepared by Iceni Projects
 - Design and Access Statement, prepared by Anomaly Architects
 - Façade Fire Risk Assessment, prepared by CBRE Façade Consultancy
 - Traffic Management Plan, prepared by Cade Roofing and Building Services Ltd

2. THE SITE AND RELEVANT PLANNING HISTORY

- 2.1 Earringdon Road is an existing six-storey plus basement commercial and residential building situated with the London Borough of Camden. The building contains retail provision at ground floor level, office floorspace at first to third floor, and residential units at the fourth level and set back fifth and sixth level.
- 2.2 The Site is located within the Hatton Cross Conservation area. The Site is not a listed building, however it is adjacent to the Grade II listed building, 25-27 Farringdon Road. The site falls within an Archaeological Priority Area.
- 2.3 The front façade of the building contains a lack of fire barriers and non-compliant insulation which no longer meets relevant fire safety standards.
- The Site is located in Flood Zone 1, the lowest probability of flood risk. The Site has a PTAL rating 6B, which demonstrates that the Site has excellent access to public transport.

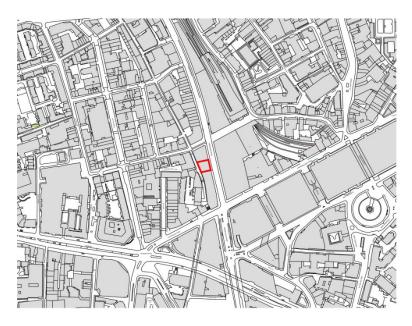


Figure 2.1 Site Location Plan

Relevant Planning History

2.5 A review of the Council's online planning portal has identified the following applications for the Site:

Application Reference	Proposal	Outcome
2016/4530/P	Replacement of existing entrance doors, new cladding around entrance, relocating existing projecting sign and	Granted
	adding 1 no. new additional sign.	28/10/2016
2006/2211/P	Retention of new aluminium shopfront with bi-parting	Granted
	automatic sliding door with vinyl finish to Saffron Hill	
	frontage	18/07/2006
2003/0442/P	Redevelopment of the site to provide new retail and office	Granted
	floorspace and 13 residential units in a building	
	comprising basement and eight storeys above, following	31/03/2004
	demolition of the existing building.	

Pre-application Consultation

- 2.6 This application has been submitted following discussions with the Council through the formal preapplication process under reference 2021/4619/PRE.
- 2.7 A pre-application meeting was held with Officer's on 30th November 2021. Officers responded positively to the proposals and the following points were noted:
 - The officer's confirmed that the principle of upgrading the façade and making aesthetic upgrades was acceptable.
 - Officers sought confirmation that the overall sustainability of the building would be improved and agreed that retaining the windows was positive from a sustainability perspective.
 - The design officer was supportive of the proposed design and stated that the proposal both preserves and enhances the conservation area.

- Officers confirmed that overall they were happy with the materials and design approach and supported the design contrast with the adjacent listed building presented at option 2.
- Officers confirmed that the proposal was acceptable from a heritage and townscape perspective

3. THE PROPOSED DEVELOPMENT

- 3.1 The proposed development seeks to re-clad the building as the existing façade does not meet fire safety standards. This update to the building presents an opportunity for the Applicant to make improvements to the façade, fenestration and general aesthetic of the Site.
- 3.2 The proposal includes:
 - re-cladding the building to meet fire safety specifications;
 - enhancing the office entrance along Farringdon Road; and
 - façade, fenestration and general aesthetic improvements that maintain and enhance the existing building.
- 3.3 The enhancements have been informed by a study of the surrounding area, which include examples of dark, vertical focused facades with punctures windows.
- 3.4 The existing windows would be retained, with a focus on replacing the stone façade. The proposed development does not involve an increase in floorspace or change of use of the Site.

4. PLANNING POLICY CONSIDERATIONS

4.1 This section of the Planning and Heritage Statement defines the Development Plan and assesses the proposed development against the relevant adopted and emerging planning policy and guidance at national, regional and local level.

The Development Plan

- 4.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 The statutory development plan for the proposed development consists of:
 - The London Plan (2021)
 - The Camden Local Plan (2017)
 - The Development Management Policies (2013).
- 4.4 Camden Council also have a number of supplementary planning documents / guidance (SPDs/SPGs) which form material considerations for this application.
- 4.5 The updated National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.
- 4.6 The National Planning Policy Guidance (NPPG) is a web-based resource that was published on 6 March 2014 and provides information and guidance on planning. The NPPF and NPPG form material considerations in the determination of the application.
- 4.7 An assessment of the key planning considerations for the proposed development is provided below.

Principle of development

- 4.8 London Plan (2021) Policy D12 'Fire Safety' seeks to ensure the safety of all building users through development proposals achieving the highest standards of fire safety. Policy D12 requires buildings to be constructed in an appropriate way to minimise the risk of fire spread.
- 4.9 Camden Local Plan Policy C5 'Safety and security' seeks to make Camden a safer place and requires development to demonstrates that they have incorporated safety design principles.

- 4.10 The principle of development has been established by the existing use of the site. No changes of are proposed to the use of the building, or the existing accesses to the site. The cladding needs to be updated, as it does not achieve the relevant fire safety standards. As the building will be re-clad, there is an opportunity to refresh the tired façade of the building along Farringdon Road and improve the appearance of the building.
- 4.11 Overall, the principle of development is considered acceptable.

Fire Safety considerations

- 4.12 Following the fire at Grenfell Tower, the Government (Department for Levelling Up, Housing and Communities) requested that Council's undertake a review of privately owned high-rise residential blocks over 18 metres to collect information in relation to the cladding of these buildings. The Site was identified through this review as potentially containing unsuitable cladding.
- 4.13 CBRE Façade Consultancy have separately undertaken a Façade Fire Risk Assessment which has confirmed that the existing façade does not meet the required standards.
- 4.14 Consequently, this application seeks to remove and replace the non-compliant façade on site.

Design and Heritage

- 4.15 Good design is a central objective of the London Plan (2021), Camden Local Plan Policy D1 'Design' outlines that new development should deliver high quality design in developments. This includes development that preserve or enhance the historic environment and heritage assets.
- 4.16 Camden Local Plan Policy D2 seeks to preserve and enhance the character and appearance of Conservation Areas and designated heritage assets.
- 4.17 The existing building makes a neutral contribution to the character and appearance of the Hatton Garden Conservation Area and as a result the replacement of the existing façade would not lead to any direct harm. The use of the proposed materials responds to the varied palette along Farringdon Road, whilst retaining the existing rhythm and proportions of the existing front elevation.
- 4.18 Overall, the proposed development is considered to preserve the character and appearance of the conservation area and the adjacent Grade II listed building.
- 4.19 As illustrated in detail within the submitted Design and Access Statement by Anomaly, the proposals have been designed following a study of the surrounding area. The study identified that by reinstating a more prominent vertical design on the façade, a greater balance can be struck in proportioning the overall façade.

- 4.20 The surrounding area features a range of material pallets, with no clear dominant material or colour along Farringdon Road. The buildings in close proximity to the Site are predominantly a darker material, as a result a dark metal material palette is being proposed.
- 4.21 The proposal would replace the existing cladding on the front elevation with a dark metal and spandrel panels with vertical fins would align with the mullions in the windows. This design seeks to complement the setting of the adjacent listed building whilst differentiating itself as a separate building.
- 4.22 The upgrade to the office entrance connects the office entrance to the building, which was previously poorly integrated. The proposal includes signage vertically along the office doorway, presenting a sense of identity along the streetscape while respecting the Hatton Garden Conservation Area.
- 4.23 Overall, the proposal is respectful to the Hatton Garden Conservation Area and adjacent listed building at 25-27 Farringdon Road. The proposal would deliver a modern façade that compliments the surrounding character and should be considered acceptable in this regard.

Sustainability

- 4.24 Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy CC2 related to development needing to be resilient to climate change by encouraging sustainable design and construction measures.
- 4.25 It is acknowledged that the replacement of the building's cladding would not normally be supported by the Council due to the sustainability impact. However, as set out within the Fire Façade Risk Assessment, the existing façade does not meet fire safety standards, and consequently must be removed.
- 4.26 However, the proposal has considered the sustainability of the proposal, and measure have been taken to improve the sustainability of the proposal, including retaining the existing windows.
- 4.27 Overall, due to the fire safety considerations of the site and the measure taken to improve the sustainability of the proposal, on balance, the proposed development should be considered acceptable in this regard.

Transport

4.28 The Site is located on a red route and adjacent to a busy street and cycle lane. Replacing the façade would require scaffolding to be erected on site to permit the works which could have an impact on pedestrian movement and the cycle lane along the frontage of the site.

4.29 The Applicant has adopted a pro-active approach to this issue and has been in correspondence with TfL who have granted a license at the Site for façade and scaffolding works. Details of this is provided within the submitted Traffic Management Plan. This would be implemented throughout works.

Amenity

- 4.30 Local Plan Policy A1 and Camden CPG Design seeks to protect the amenity of neighbours, including visual privacy, outlook, sunlight, daylight and overshadowing.
- 4.31 The proposed development does not involve any extensions or increase in floorspace and would not present any amenity concerning neighbouring amenity.

5. CONCLUSION

5.1 This Planning and Heritage Statement has been prepared on behalf of AGA Rangemaster Commingled in support of a planning application for full planning permission at 21 Farringdon Road, London EC1M 3HA for:

Replacement cladding on the front elevation and façade upgrades.

- 5.2 The planning application would secure permission to re-clad the building to meet fire safety standards. Alongside this permission is sought to make improvements to the façade, fenestration and general aesthetic of the site.
- 5.3 The proposal has been sensitively designed to consider the sustainability implications of the development, and to respect the Hatton Garden Conservation Area and adjacent listed building.
- 5.4 Overall, the proposed development complies with the relevant national and local planning policy, and should be approved without delay.