



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

FAO: Elaine Quigley
Planning Department
London Borough of Camden
5 Pancras Square
London
N1C 4AG

16 May 2022

RM-22/H035
BY EMAIL

Dear Elaine,

LPA REF: 18-19 SOUTHAMPTON PLACE, LONDON WC1 (PROJECT 4)

This note sets out the context and rationale for not targeting BREEAM at 18-19 Southampton Place (Project 4), in relation to the impact upon the special interest of the Grade II* listed buildings.

It is noted that, in accordance with Policy CC2 of Camden's Local Plan (2017), the Council require non-domestic developments of 500sqm of floorspace to achieve BREEAM "excellent". This is supported by Camden's Energy Efficiency and Adaptation CPG (January 2021), which states at Chapter 11 that BREEAM Excellent is required for all non-residential development of 500 sqm or more floorspace.

As submitted, the proposals seek minor alterations to modern walls to improve the internal layout of the buildings enabling the creation of modern office floorspace. It is understood that the Council considers the need to achieve BREEAM is triggered by the floor area exceeding 500sqm and the proposed change of use to Class E.

Firstly, the proposals seek to restore and redecorate the listed buildings as opposed to refurbishing them and thus it is questioned if the requirement to achieve BREEAM is applicable in this instance. Secondly, it is important to note that both the CPG and the Briefing Paper published on behalf of BREEAM, entitled *Sustainable Refurbishment of Heritage Buildings* recognises that there are challenges associated with listed buildings achieving BREEAM and that a flexible approach should be taken. Lastly, Historic England guidance *Energy Efficiency and Historic Buildings* notes that in considering upgrades, it is firstly important to understand the risks, see how they can be minimised or eliminated, and gauge whether this can be done to a degree that makes the proposal acceptable while retaining sufficient benefit.

Improving the environmental performance of existing buildings is complicated by physical factors such as the building's existing condition, structure, fabric and built form. This is heightened by the buildings being designated listed buildings and at Grade II*, they are considered to be particularly important buildings of more than special interest. As such any retrofit measures associated with achieving BREEAM would need to be assessed in relation to harm to the significance of the building. In accordance with the NPPF (paragraph 199) great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be), this is irrespective of the level of harm to the assets significance.

Having reviewed the Historic England guidance and given the desire to preserve existing fabric and prevent any harm to the special interest of the designated heritage asset, it is considered that targeting BREEAM is not feasible in this instance. It is noted that within BREEAM exceptions to meeting the

standard criteria are allowed in relation to Visual Comfort, Indoor Air Quality, Thermal Comfort and Acoustic Performance.

Visual Comfort

In order to improve visual comfort extensive alterations would be required and would result in the loss or alteration of historic fabric. The location and scale of existing fenestration contributes to the buildings architectural interest and therefore there is no opportunity to alter these to improve daylight. This also relates to the basement level where access to natural daylight is limited by the hierarchy of levels and detailing, namely window proportions, which, if to be altered to achieve BREEAM requirements would harm the special interest of the building.

Indoor Air Quality

The context of the listed building, in an urban setting adjacent to an existing road, limits the ability to achieve the required BREEAM levels. This is further hindered by the need for natural ventilation which supports the traditional construction of the building. Should natural ventilation be restricted, and the movement of moisture be prevented, deterioration or damage to fabric of interest could result.

Secondly any additional mechanical introductions to improve the indoor air quality would have an impact on the building both internally and externally. A large amount of plant would be required, affixed to the building, the building would need to be made airtight and additional service routes and ducting would need to be formed. Given the architectural interest of the exterior of the building and the highly decorative and detailed interiors any introduction of this kind would result in harm. Notwithstanding the impact on fabric condition resulting from restricting the movement of air.

Thermal Comfort and Acoustic Performance

To score credits in relation to acoustic and thermal performance significant intervention would be required to the building's fabric, which would have a consequential impact on internal features. Additional insulation would be required to improve the thermal performance of the building and to restrict the movement of sound. Whilst the proposals include the introduction of insulation into the floor voids to improve acoustic and thermal performance, the floor depths limits more substantial enhancements that would only be achieved through raising floor levels and consequently needing to realign skirting boards, doors and architraves. The impact on the special interest of the listed building would be in relation to fabric of interest and the internal hierarchy of the buildings.

Furthermore, to achieve thermal comfort, additional mechanical intervention would be needed to create thermal zones and regulate the temperature within the building. Similarly, to concerns with improving indoor air quality, additional plant would result in harm both internally and externally.

Conclusion

The desire to achieve BREEAM is recognised, however in this specific context it is not considered to be feasible owing to the potential impacts on the special interest of the designated heritage assets. Where it can be sensitively achieved, measures have been taken to improve the efficiency and environmental performance of the buildings in accordance with environmental ambitions and to ensure the longevity of the buildings.

I therefore trust that you agree with the intention not to target BREEAM at 18-19 Southampton Place.

Please let me know if you have any questions.

Yours sincerely,



Rebecca Mason
Associate, Built Heritage and Townscape

cc. Nick Belsten, HGH