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London Borough of Camden
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Ref: LSW/ANE/CHST/TMA/U0017572
Your ref: PP-12025563

31 March 2023

Dear Sir or Madam

Town and Country Planning Act 1990 (as amended)
Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
3 Waterhouse Square, 138-142 Holborn, London, EC1N 2SW

We are instructed on behalf of our client, Prudential Assurance Company Limited ('the applicant') to submit an application for planning permission and listed building consent in respect of development at 3 Waterhouse Square ('the site'). The proposed works comprise the erection of a plant enclosure at rooftop level.

The proposed works form part of a wider strategy for the refurbishment of Waterhouse Square. Currently, no plant is proposed within the enclosure. The requisite plant will be submitted under separate cover subject to the granting of permission. On that basis, the proposed description of development is:

"Erection of single storey rooftop plant enclosure".

Site and Surroundings

Waterhouse Square, 138-142 Holborn is located on Holborn's northern side and currently provides and late 19th Century estate comprising three buildings of varying heights. A number of additions were made to the building throughout the early 20th Century. The estate is Grade II* Listed. The site is also located within the Hatton Garden Conservation Area.

3 Waterhouse Square ('the site'), to which this application relates currently provides office (Use Class E) floorspace. The site fronts onto Holborn to the south and is bounded by Waterhouse Square (street) to the west, with the remaining Waterhouse Square buildings to the north and east.

Pedestrian access to the site is from Holborn onto Waterhouse Square. Servicing and maintenance currently takes place from Waterhouse Square to the west of the site. The site is well served by public transport. Chancery Lane London Underground Station is located within 100m from the site. The site is also served by 13 bus routes within an eight-minute walking distance. Taking this into consideration, the site registers a Public Transport Access Level rating of 6b, on a scale of 1a-6b.

The current plant provisions for the Waterhouse Square estate are located at the roof of 2 Waterhouse Square.

For the purposes of planning policy, the site is subject to the following planning policy designations:

- Holborn Growth Area
- Central London Area
- Blackheath Point to St Paul's Cathedral LVMF
- Greenwich Park Wolfe statue to St Paul's Cathedral LVMF
- Primrose Hill summit to St Paul's Cathedral
- Archaeological Priority Area

Proposal

Planning permission and listed building consent are sought for the installation of an acoustic screen to enable the future installation of a more efficient and sustainable central plant, which is located on the roof of 3 Waterhouse Square.

The proposed screen will stand at approximately 4.5 metres in height, be 300mm in depth and will be predominantly formed with acoustically rated louvres to minimise the impact of the proposal on neighbouring buildings.

As shown within the accompanying Design and Access Statement, the proposed plant enclosure will result in a modest visible change when viewed from Brooke Street and High Holborn.

Policy Context and Legislation

Listed Building consent is required for any works to demolish any part of a listed building or to alter or extend it in a way that affects its character as a building of special architectural or historic interest, irrespective of whether planning permission is also required.

The Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') places a duty upon the local planning authority to determine applications affecting listed buildings and pay special regard to the desirability of preserving the building or its setting.

The Act sets out that in considering whether to grant listed building consent for any works, the local planning authority "shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

For the purposes of the Act, decisions should be made in accordance with the provisions of Section 38(6) of the Planning and Compulsory Purchase Act (2004), in so far as applying relevant policies set out within the development plan, unless material considerations indicate otherwise. In this instance, the development plan comprises the London Plan (2021) and the Camden Local Plan (2017).

Assessment

Design & Conservation

In considering the provisions of the NPPF, the Government has attached great importance to conserving and enhancing the historic environment. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposals would cause to the significance of the heritage asset.

Paragraph 201 of the NPPF states that, where a proposal would lead to substantial harm to, or the total loss of significance of, a designated heritage asset, planning permission should be refused unless the loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or the building cannot be used or maintained.

Paragraph 202 of the 'NPPF' states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposals.

Policy D1 of the Local Plan requires development to be of the highest quality. This includes responding to the local context and character and is sustainable in design and construction.

With respect to heritage assets, Policy D2 requires development to preserve, or where appropriate, enhance the character or special architectural interest of a heritage asset. The Council will not permit the development which results in substantial harm to a heritage asset.

KM Heritage have prepared a Heritage and Townscape Statement to accompany the application. The Heritage Statement confirms that the proposed plant screen will be located within the part of Building 3 that dates from the 1990s and does not interact with the original features, namely the external façade facing the internal central courtyard and surviving glazed brick elements within the internal atrium area. KM Heritage confirm that the 1990s fabric and design have no heritage or townscape significance and that no historical elements are affected by the plant screen proposal.

The Heritage Statement confirms that the visual, townscape and heritage effects of the plant screen will be minimal at most, as it would not be visible from within the Waterhouse Square complex at ground level, and when visible in the certain limited views will be neutral and recessive in appearance. Notwithstanding the marginal increase in height over the existing roof top equipment, the proposals have been designed to enhance the present situation with a cleaner and more cohesive approach to the appearance at the top of the building and will preserve the special architectural or historic interest of the Grade II* listed Waterhouse Buildings and the wider Conservation Area.

Amenity

Daylight Sunlight

Policy A1 of the Local Plan relates to managing the impact of development, and states that the council will protect the quality of life of occupiers and neighbours of proposals. This includes ensuring that daylight, sunlight and overlooking do not have negative impacts to occupiers and neighbours and will assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces.

A Daylight, Sunlight and Overshadowing report has been prepared by Point 2 Surveyors to accompany this application. In accordance with BRE guidelines, the report details the daylight and sunlight assessments that have been carried out to the surrounding residential habitable room windows at 150 Holborn. The results show that any daylight or sunlight reductions to the surrounding residential habitable rooms is within BRE guidelines. Where reductions in daylight are beyond BRE guidelines, the two windows are obstructed by a balcony, the presence of which results in the larger reduction of daylight. Overall, the effect is not considered significant. The report concludes that the daylight and sunlight effects are not deemed material and comply with policy A1 of the Local Plan.

Acoustic

Policy A4 of the Local Plan seeks to ensure that noise and vibration is controlled so that it will not have unacceptable impacts on the amenity of neighbouring properties. Noise sensitive development includes housing, schools and hospitals as well as offices, workshops and open spaces.

The policy incorporates a 'traffic light' assessment for each type of noise sensitive receptor. 'Green' represents where noise levels are an acceptable level. 'Amber' where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development. 'Red' where noise is observed to have a significant adverse effect.

Considering commercial and plant development, 'green' is 10dB below the existing background noise levels, 'amber' is 9db below to 5db above background noise levels, and 'red' is anything greater than 5dB above.

A Plant Noise Impact Assessment has been prepared by Hoare Lee to accompany this application. The assessment has been undertaken on a 'worst case' scenario to determine whether the proposed screen would be acceptable. No plant is included within this application.

The Noise Impact Assessment considers the impact of the plant on 150 Holborn as the closest residential and commercial receptor to the proposed plant area.

As no plant is currently proposed, a 'worst-case' scenario has been designed and assessed. The Noise Impact Assessment is undertaken on the assumption that 7no. ASHP, 2no. chiller and 1no. life-safety generator units will be provided.

The predicted noise levels are set out in detail within the accompanying Noise Impact Assessment. In summary, the plant noise will result in a modest uplift between 1dB and 3dB above the existing background noise levels. It is noted that the residential properties will experience a reduction of 1dB, with the increases only experienced at the office receptors. Considering Policy A4, the proposals will not have unacceptable impacts on the amenity of neighbouring properties and will be considered acceptable when assessed in the context of other merits of the development.

The report concludes that whilst this application is solely for the installation of a new plant screen which does not generate noise, further consideration of the control of noise emissions from any future plant installed on the roof should be assessed. The proposals therefore comply with Local Plan policy A4.

Application Documents

Accordingly, along with this covering letter, the application submission comprises the following:

- Signed and completed application forms;
- Site Location Plan at 1:1200 Scale, prepared by Orms;
- Site Plan at 1:200, prepared by Orms;
- Existing and Proposed Plant plans, prepared by Orms;
- Existing and Proposed Plant sections, prepared by Orms;
- Demolition Plans, prepared by Orms;
- Design and Access Statement, prepared by Orms;
- Heritage and Townscape Statement, prepared by KM Heritage;
- Daylight, Sunlight and Overshadowing report, prepared by Point 2 Surveyors; and
- Noise Impact Assessment, prepared by Hoare Lea.

The application has been made online through the Planning Portal and the requisite fee has been paid online.

We trust that the information submitted is sufficient to validate the application. Should you require anything further, please contact Chloe Staddon (0771 734 8812) or Bethan Warwick (07385409543).

Yours Faithfully,



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