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Planning Department
London Borough of Camden
5 Pancras Square
London
N1C 4AG

15 May 2023

Our Reference: 23/115
Via PLANNING PORTAL

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
40 WHITFIELD STREET, LONDON W1T 2RH
APPLICATION FOR FULL PLANNING PERMISSION

We write on behalf of our client, E&A West End Properties Limited ('the Applicant'), to formally submit a full planning permission in accordance with the Town and County Planning Act 1990 (as amended) for the above site.

This application seeks planning permission for the following development:

"Installation of mechanical plant enclosed within an acoustically attenuated box at roof level"

The proposals have been submitted as part of the Applicant's ambition to ensure the commercial space within the building benefits from new, best in class ventilation as part of creating a more energy efficient and sustainable commercial building.

The proposals would represent an enhancement to the building's thermal performance and sustainability credentials, and are considered to conserve the character and appearance of the conservation area.

The following documentation has been submitted with this application:

- This Covering Letter / Planning Note
- Application Forms and Certificates
- Site Location Plan, prepared by BASE
- Existing and Proposed Floor Plans and Elevation Drawings, prepared by BASE
- Views Study, prepared by BASE
- Plant Noise Impact Assessment prepared by EEC

a. The Site and Relevant Background

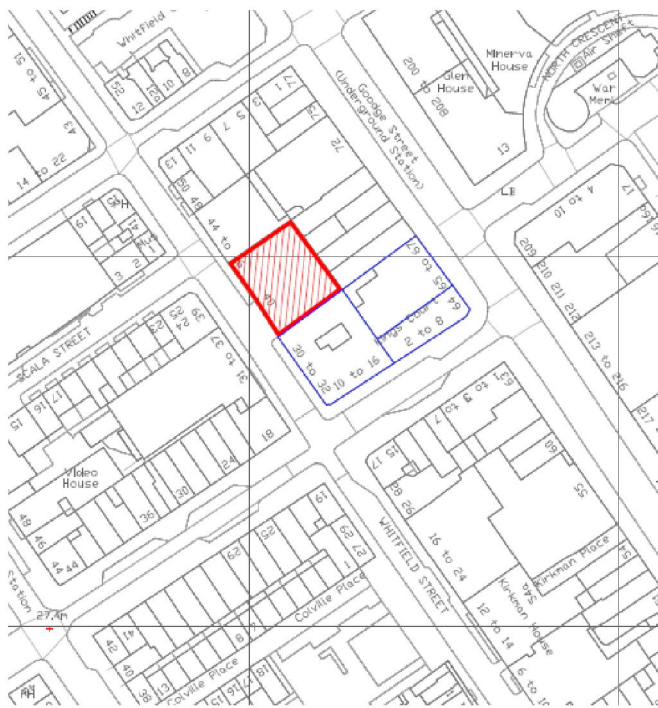
40 Whitfield Street is an existing five storey (plus basement) commercial building that was constructed in the early 1990s. The full address of the building is 34-42 Whitfield Street and connects internally to 10-16 Goodge Street, with the larger commercial building having frontages to both Whitfield Street and Goodge Street. An existing Tesco Metro retail unit is provided on the Goodge Street/Whitfield Street corner, with the remainder of the building being used for general Class E commercial purposes.

The building was constructed in accordance with planning application reference 8800483, which saw planning permission granted to provide retail and office accommodation at ground floor level, with office accommodation on the upper floors.

Given the age of the building, it has become necessary to upgrade the building's mechanical plant to ensure the energy efficiency and performance of the building is up to modern day standards.

The Site location plan is provided at **Figure 1** below.

Figure 1: Site Location Plan



Planning policy designations

The Application site is situated within Holborn and St Pancras ward within the London Borough of Camden. It is subject to the following designations:

- London's Central Activities Zone (CAZ)
- Goodge Street Neighbourhood Centre

- Charlotte Street Conservation Area

It is also noted that the site falls outside of a primary shopping frontage, with this frontage located along Goodge Street rather than Whitfield Street.

The buildings are not locally or statutory listed.

The site also benefits from a public transport accessibility level (PTAL) of 6b, indicating excellent public transport connectivity.

b. Proposed Development

The proposed development seeks full planning permission for the installation of a mechanical plant enclosed within an acoustically attenuated box to be constructed at roof level of 40 Whitfield Street.

The proposed mechanical plant would be located within the north-eastern corner of the rooftop, setback approximately 8.75m from the Site's frontage to Whitfield Street to the south, and 3m from the boundary to 30-32 Whitfield Street to the east. The siting of this enclosure has been guided by the structural design, existing mechanical risers, and grid lines of the host building, with the supports to be located directly above the existing steel structures.

The proposed mechanical plant acoustic enclosure would be rectangular in shape. The proposed dimensions and materials of the enclosure are summarised as follows:

- 6.51m in length
- 4.67m in width
- 2.8m in height
- Aluminium cladding to be finished in graphite grey powder coating (RAL 7024)

The proposals relate to mechanical plant only, and do not seek to change the existing GIA of the Site. They do not seek to change the Site's existing use.

Further details of the proposed mechanical plant and acoustic enclosure are set out within the accompanying plans prepared by BASE.

c. Planning Policy Assessment

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.

The relevant Development Plan for the site consists of:

- The London Plan (2021)
- The Camden Local Plan (2017).

Camden also has a number of Camden Planning Guidance documents (CPGs), along with the Charlotte Street Conservation Area Appraisal and Management Document (2008) which form material considerations for this application.

In addition, the London Borough of Camden are also in the process of preparing their new Local Plan, having recently completed the initial engagement stage in January 2023. A new Draft Local Plan and Site Allocation document is expected to be public for public consultation in Autumn 2023.

The updated National Planning Policy Framework (NPPF) was published in July 2021 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.

In addition, the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) places a duty on decision makers to have special regard to the desirability of preserving heritage assets, including conservation areas as a whole.

An assessment of the key planning considerations is set out below.

Principle of Development

The proposals relate to the installation of mechanical servicing plant to improve the energy efficiency and sustainability of an existing commercial building.

The proposed alterations, are therefore, considered to be entirely in accordance with the objectives of Policy E1 of the Local Plan (2017) in that it would enhance the quality of an existing commercial asset within Central London Area of the Borough, in which the Site is situated.

Design and Heritage

Local Plan Policy D1 'Design' seeks to secure high quality design in all development that respects local character and context. Specifically, in relation to shopfronts, it encourages active shopfronts that add vitality to the street and provide views into and out of buildings, and specific proportions at ground floor level to attract pedestrians. Paragraph 7.34 of the Local Plan 2017 states that building servicing equipment should be located within a visually inconspicuous position such that it is not visible from the public domain.

Policy D2 'Heritage' requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

The Charlotte Street Conservation Area Appraisal and Management Plan (2008) assesses the key characteristics of the conservation area. The Appraisal doesn't identify the building as a positive or negative contributor to the character and appearance of the conservation area, and it also notes that Whitfield Street is a street defined by more modern, 20th century buildings. It notes a variety of brick and render as being the predominant materials.

The proposed development would see the installation of mechanical plant within a high-quality architecturally designed acoustically enclosed box at roof level. The acoustic enclosure would be constructed of high-quality finishes and materials with a muted colour palette (Satin Grey) that is in keeping with the character of roof level structures within the surrounding area. Rooftop plant is a common feature of the Site's immediate context including the adjoining building at 10-16 Goodge Street.

The siting of the plant and acoustic enclosure has been guided by the structural design, mechanical risers, and grid lines of the host building, with the supports to be located directly above the existing steel structure.

The proposed plant would be well setback from the roofline some 8.75m from the Site's frontage to Whitfield Street to the south, and 3m from the boundary to the adjoining 30-32 Whitfield Street to the east. As demonstrated through selected viewpoints from street level provided in the accompanying View Study taken from Whitfield Street, Goodge Street, and Tottenham Court Road, the proposed plant enclosure would not be visible from the public domain.

For these reasons, the proposal is considered to represent a necessary enhancement to the building's thermal performance and sustainability and is considered to conserve the character and appearance of the conservation area. The scheme is therefore considered to comply with Policy D1 and D2 of the Local Plan.

Energy and Sustainability

Policy CC1 'Climate change mitigation' of the Local Plan (2017) supports and encourages sensitive energy efficient improvements to existing buildings.

The proposals are entirely in accordance with the objectives of this policy in that they would improve sustainability and energy efficiency credentials of the building. These works would see the operational carbon efficiency of the building enhanced and ensure the long-term viability of this prime commercial asset.

Relationship with Neighbouring Properties

Policy A1 of the Local Plan 2017 seeks to protect the quality of life of occupiers and neighbours of new development. It seeks to ensure that the amenity of communities, neighbours and occupiers is protected. Policy A4 of the Local Plan 2017 seeks to ensure noise and vibration is controlled and managed.

Appendix 3 of the Local Plan 2017 relates to noise and states that the relevant noise limits for mechanical plant are 10 dB below the measured background noise level during the hours of proposed operation.

A Noise Impact Assessment including unattended noise monitoring has been prepared and undertaken by EEC to accompany the application.

The assessment and monitoring confirm that the noise criterion is met at all assessment locations during all periods of the proposed rooftop plant operation, assuming the plant is installed within the four-sided acoustic screen which is proposed as part of this application.

The noise level for the proposed plant and acoustic enclosure would, therefore, comply with the relevant criteria required by Policy A4 of the Local Plan (2017).

d. Summary

Overall, the proposed development is considered to be a sensitive upgrade to the building's energy performance which would conserve the character and appearance of the conservation area.

The proposals have been assessed and considered to comply with the relevant adopted and emerging planning policy and guidance.

We trust that the enclosed information is sufficient to expedite validation of our application. However, should you require any further information, please do not hesitate to contact Tim Fleming () or () of this office in the first instance.

Yours sincerely,



Icen Projects

ENC. As listed above.