



Cooling Hierarchy Assessment

Project: 40 Whitfield Street London W1T 2RH
To: Sam FitzPatrick
Date: 2 June 2023
Title: Cooling Hierarchy Assessment
App Reference 2023/1949/P

a. Introduction

We write on behalf of our client, E&A West End Properties Limited ('the Applicant') in relation to an application for full planning permission submitted and validated by Camden Council ('Council') on 23 May 2023 (ref: 2023/1949/P). The proposals seek the installation of mechanical ventilation plant equipment at roof level of an existing commercial building at 40 Whitfield Street, London W1T 2RH ('the Site').

This statement has been prepared to address the relevant policies within the Camden Local Plan (2017) and London Plan (2021) in relation to 'cooling hierarchy' to justify the installation of mechanical ventilation plant equipment.

b. Relevant Policy

The relevant Development Plan for the site consists of:

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

Policy SI 4 (Managing Heat Risk) (B) requires major development proposals to demonstrate how proposals will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. The cooling hierarchy requires applicants to demonstrate that other methods of cooling such as passive ventilation have been considered.

Whilst the proposal is not considered a 'major development', this assessment has been prepared for the purposes of completeness.

Camden Local Plan (2017) policy CC2 further requires that proposals which require active cooling should explain how the London Plan (2017) 'cooling hierarchy' has been addressed.

Camden Planning Guidance on 'Energy efficiency and adaptation' includes further guidance in relation to ventilation and cooling and details that justification should be provided if active cooling is unavoidable.

c. Assessment

The proposals seek the installation of mechanical ventilation plant at roof level including air source heat unit, along with condensers. In the circumstances of the case, it is considered that mechanical ventilation systems are appropriate for the Site for the following reasons:

- The proposals relate to an existing and tenanted commercial building constructed in the 1990s. It is not possible or feasible to implement measures to reduce internal overheating

suggested in Policy SI 4 of the London Plan (2021) such as altering the orientation of the building or implementing further shading measures.

- The building's façade and fenestration, and specifically the windows at the primary Whitfield Street elevation are fixed shut and it is, therefore, not possible to allow for passive ventilation without significant alterations to the building's fenestration. These interventions would be beyond the scope of this application.
- It is also beyond the scope of this application to alter the internal characteristics of the building such as raising the ceilings to improve its thermal performance given it is an existing and tenanted commercial building.
- Mechanical ventilation is, therefore, the only option available to improve the thermal performance of the building and achieve the operational carbon efficiency benefits necessary to ensure the long-term viability of this prime commercial asset.
- The mechanical ventilation plant proposed is highly efficient have been designed to reuse the waste heat they produce in line with industry standards and expectations.
- As a result of these interventions, it is expected that the building would be future proofed its EPC rating improved, which would align with the Government's intentions to see commercial properties to achieve an EPC B rating by 2030.