PLANNING STATEMENT



IN SUPPORT OF THE LISTED BUILDING CONSENT FOR ASHP INSTALLATION IN THE REAR YARD AND HEATING AND VENTILATION SYSTEMS REPLACEMENT

For:

LFB

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DOCUMENT VERIFICATION

PLANNING REPORT

ON: EUSTON FIRE STATION, LONDON,

NW1 2DH

FOR: LONDON FIRE BRIGADE

FRANKHAM PROJECT NO.: 700605

Signature:	name:		

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Issue Purpose	Revision	Issue Date	Prepared by	Reviewed by	Approved by
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1.0 INTRODUCTION

- 1.1 This planning statement has been prepared by Frankham Projects on behalf of London Fire Brigade (the 'Applicant') to support a detailed planning application submitted to Camden Council for the Installation of 5 Air Source Heat Pumps in the rear courtyard.
- 1.2 Full planning permission is sought for the following:

"Internal and external alterations associated with the installation of 5 ASHPs in rear courtyard."

- 1.3 This planning statement appraises the scheme within the context of the planning policies set out in the NPPF and the Council's Development Plan. It is set out as follows:
 - Section 2 describes the site and surroundings.
 - Section 3 provides an overview of the proposed development.
 - Section 4 summarises the relevant national and local planning policies.
 - Section 5 draws together the conclusions.
- 1.4 This planning statement should be read in conjunction with the following documents and drawings which form part of the overall planning application submission:
 - Application Form.
 - Site Location Plan.
 - Existing and Proposed Drawings.
 - Acoustic Assessment
 - Spacing of Pipes Statement



2.0 SITE AND SURROUNDING AREA

- 2.2 The application site, Euston Fire Station, approximately 180m east of Euston train station. The property extends approximately 630m2.
- 2.3 The site is a 6-storey building used as a fire station.



- 2.4 As shown on the Camden Council conservation map the site is located within the Bloomsbury conservation area.
- 2.5 There are no Tree Preservation Orders on the site and the site is also located within Flood Zone 1 (lowest probability of flood risk).
- 2.6 Euston Fire Station is a grade II* listed building. There are multiple listed buildings in the surrounding area, with the railings opposite being grade II listed and St Pancras Church being Grade I listed.



3.0 THE PROPOSALS

3.1 Full planning permission is sought for the following:

"Internal and external alterations associated with the installation of 4 ASHPs in rear courtyard."

- 3.2 No vehicle or pedestrian access will be altered in the proposed development.
- 3.3 The proposed works will largely be installed within existing pipelines and connections as replacement works. The details of this are covered by the accompanying Heritage Impact Assessment.

4.0 PLANNING POLICY CONTEXT

- 4.1 The LFB released a statement in 2022 that states their goal to become carbon net zero by 2030. As part of the process order to achieve this, the removal of gas dependency within LFB properties and the installation of ASHP where appropriate will play a major role.
- 4.2 Euston Fire Station is a Grade II* listed building. Paragraph 7.16 of the Camden Local plan states that adaptations of existing buildings must be sympathetic to the buildings character. Installing the ASHP's in the rear yard will mean they are hidden and will not be disruptive to the character to of the fire station. Paragraph 7.29 states the council's interest to protect the important views in the area, including listed buildings. Therefore, the placement of ASHP's in the rear yard will have no impact on the view of the listed buildings and other surrounding properties.
- 4.3 **Policy D2** states that to preserve the Borough's listed buildings the council will:
 - Resist the total or substantial demolition of a listed building.
 - Resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.
 - Resist development that would cause harm to significance of a listed building through an effect on its setting.
 - The proposed development adheres to all these requirements and provides a necessary instalment of infrastructure to improve the operating of the fire station.
- 4.4 Paragraph 7.56 of the Camden Local Plan states.

Retrofitting listed buildings for the public benefit, improved energy efficiency and an improvement in sustainability will be considered against the scale of harm to the appearance and significance of the building. The proposed development will have 5 ASHP's installed in the rear courtyard to improve the energy efficiency and sustainability, without harming the character of the building or conservation area.

NEED PLANS

Figure 1- location of 5 ASHP's in the rear yard

4.5 Paragraph 7.62 states "Proposals that reduce the energy consumption of listed buildings will be welcomed provided that they do not cause harm to the special architectural and historic interest



of the building or group. Energy use can be reduced by means that do not harm the fabric or appearance of the building, for instance roof insulation, draught proofing, secondary glazing, more efficient boilers and heating and lighting systems and use of green energy sources.".

- 4.6 A Heritage Impact Assessment has been completed to determine the impact of the proposed external works on Euston Fire Station. The detailed and comprehensive report fully justifies and supports the proposals.
- 4.7 Para. 5.1.4 of the London Plan suggest a "Needs Assessment" should include an audit of existing facilities and services before improvements should be made. The audit on Euston Fire Station concluded that gas boilers had expired their economic life, two have been condemned and the third is presumed to be at risk by association.
- 4.8 **Policy GG6 A** of the London Plan states development must seek to improve energy efficiency to become zero-carbon by 2050. The proposed works at Euston Fire Station will vastly improve the energy efficiency within the fire station and reduce the total carbon emissions aiding to achieving this goal.

5.0 **CONCLUSIONS**

- 5.1 Overall, it is considered that the proposal described in this planning application represents a considerate development that will not negatively impact on the local environment.
- 5.2 The site is located within a conservation area, but the scale and design of the development is suitable for the surrounding area.
- 5.3 The importance of the heritage asset is recognised so the works will be conducted in a respectful manner to minimise any disruption to the heritage asset, as outlined within the Heritage Impact Assessment, which forms part of this application.
- 5.4 The scheme has been carefully considered to represent the most efficient use of space to enhance the property.
- 5.5 The maintenance and improvement works are essential to the continued fire stations operations. Much of the existing plant is no longer fit for purpose or economically expired.
- 5.6 It is considered that the development will not result in any adverse impacts.