

Planning Department  
The London Borough of Camden  
Camden Town Hall  
Judd Street  
London  
WC1H 9LU

Our ref: KRM/22-01717  
Your ref:  
Date: 06<sup>th</sup> July 2023

Dear Sir/Madam,

**Re: Full Planning Application for the Installation of 6 x Air Conditioning Units at 1 – 5 Portpool Lane, London, EC1N 7UU**

On behalf of Med Logistics Properties Limited, we are applying for 6 x Air Conditioning Units at 1 – 5 Portpool Lane, London, EC1N 7UU associated with the recent change of use of the site to a medical centre.

This application is submitted via planning portal (PP-11984417) and in addition to this supporting covering letter and associated applications forms, the following documents are submitted in support of the scheme:

- Application Form, Certificates and CIL Questions prepared by Rapleys LLP
- Site Location Plan
- A Noise Impact Assessment prepared by Clement Acoustics
- This Planning Letter prepared by Rapleys LLP

A payment of £494.20 (including Planning Portal service charge) to cover the planning application fee has been paid to Camden Council via the Planning Portal. We would be grateful if you could consider the contents of this letter when determining the application.

## Background

1-5 Portpool Lane, is an office building comprising lower ground, ground and two upper floors. The building is located within Hatton Garden Conservation Area which is not subject to any Article 4 Directions.

## Planning History

There are a number of planning available online. The applications of relevance to this application include:

- A Certificate of Lawfulness (Proposed) (LPA Ref. 2022/4546/P) for *“Use of Lower ground floor and Ground floor as a Medical Centre - (Class E)”* granted 09 February 2023.

**Rapleys – 66 St James's Street St James's London SW1A 1NE**

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- Full Planning Permission (LPA Ref. 2015/7284/P) for *“Installation of 4no air handling units on west elevation”* granted 05 September 2016.

## **Proposal**

This full planning application seeks permission for:

*“Installation of 6 x Air Conditioning Units on the western elevation of 1 – 5 Portpool Lane, London, EC1N 7UU”.*

The units would be secured to the western flank elevation of the building adjoining the alleyway, above and adjacent to the four existing air condition units.

The proposed air conditioning units would comprise 6 x Toshiba Air Conditioning Condenser Units.

## **Planning Policy Guidance**

### National Planning Policy

Relevant Central Government Policy is contained within the National Planning Policy Framework (the “NPPF”, last updated in 2021) and its accompanying National Planning Practice Guidance (NPPG), adopted/launched online in 2014.

The NPPF is underpinned by a presumption in favour of sustainable development. In terms of decision-taking, paragraph 11 and the NPPG advises that Local Planning Authorities (LPAs) should seek to approve development proposals which accord with the Development Plan without delay or grant planning permission for proposals where the Development Plan policies are out-of-date – unless any adverse impact of doing so would demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

Paragraph 81 confirms that planning decisions should help create conditions in which businesses can invest, expand, and adapt and that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

### Regional Planning Policy

London Plan (2021) Policy D14 seeks to ensure development does not have an adverse impact on neighbouring uses or properties in regard to levels of noise and vibration generated by the proposed development.

### Local Planning Policy

The development plan comprises the Camden Local Plan (2017) and the Policies Map Alterations (2017).

Work has commenced on the Camden Local Plan Review. However, given this is in its early stages and it is not a material consideration to this planning application.

The site is located within Hatton Garden Conservation Area. There are no other relevant designations of note.

Policy A4 of Local Plan seeks to ensure noise and vibration will not cause harm to local amenity, paying particular regard to noise sensitive uses.

Appendix 3 (Noise Thresholds) provides further guidance on noise and criteria for assessing its impact on the surrounding area.

Policy D2 highlights the importance of protecting, preserving and, where possible, enhancing the boroughs heritage assets and their setting, including ensuring development would not cause harm to the character or appearance of the boroughs heritage assets.

### Hatton Garden Conservation Area

Originally designated in 1999, Hatton Garden Conservation Area covers 20 ha of land west of Farringdon Road. Within the Hatton Garden Conservation Area Appraisal (2017), the application site is identified as being located within the Bourne Estate Sub-Area, which is predominantly characterised by larger perimeter blocks and grand, classical treatment of buildings and courtyards. It is noted that 1-5 Portpool Lane was more recently constructed (1960s).

Within the Hatton Garden Conservation Area Appraisal, the conservation area is identified as containing many large, highly serviced buildings that have a large amount of plant equipment that can be visually and audibly disruptive, particularly due to historic street pattern. The Council will expect all services to be concealed from view as far as possible and sited so as to minimise noise at street level and in adjacent properties.

### **Planning Considerations**

#### Visual Amenity

As noted above, the proposed air conditioning units would be attached to the western flank wall in the alleyway off Portpool Lane. Whilst the site is located within a Conservation Area, the location is largely hidden from street view within the confines of the alleyway, behind a 1.8m railing fence, and above existing cycle storage and air conditioning units. The siting of the proposed air conditioning units is therefore both practical and would have minimal impact on the character and appearance of the Conservation Area and visual amenity of the street scene.

#### Noise

This application is supported by a Noise Impact Assessment prepared by Clement Acoustics.

The Noise Impact Assessment identified the closest noise sensitive receptor as a residential window located on the western façade on the building opposite (23m from the proposed location of the air conditioning units). The Noise Impact Assessment confirms that the loudest external noise levels arising from the installation of the proposed air conditioning units would be 22 dB(A). The impact on the nearest noise receptor would therefore be below the relevant British Standard target of 30dB(A), without taking into account the attenuation of the window itself. The internal noise level at the receptor following the installation of the air conditioning units would be 7dB(A), significantly below the target of 30dB(A). The noise report thereby confirms that the proposed development would not cause harm to residential amenity regarding noise and vibration when assessed against the most stringent criteria set by British Standards.

In regard to the impact of predicted noise levels on the closest commercial premises, the noise level at the relevant receiver was found to be 35dB(a) where the relevant design range is set at 35-40dB(A) and would therefore meet the relevant criteria.

In lieu of the above, the Noise Impact Assessment confirms that no mitigation measures are necessary.

### **Conclusion**

The proposed air conditioning units are required to facilitate the use of the lower ground floor and ground floor of 1 – 5 Portpool Lane as a medical centre. The units would be pragmatically located

on the flank wall of the main building within the alleyway, adjacent and above existing air conditioning units, plant machinery and cycle racks. The proposed location has limited views afforded to it from the street scene or wider area thereby ensuring minimal impact on the character and appearance of the conservation area.

Furthermore, the proposed development would meet the criteria set by Camden Council and relevant British Standards regarding noise impact on neighbouring residential and commercial receptors.

It is therefore considered that the proposed development accords with the relevant local, regional and national planning guidance, and it is requested that planning permission is granted at the earliest possible juncture.

If you any further information or have any queries in respect of the submitted documentation, please do not hesitate to contact me.

Yours faithfully,

*Kathryn Rose McCain*

[Kathryn Rose McCain \(Jul 11, 2023 10:18 GMT+1\)](#)

**Kathryn McCain**

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