

20-23 Greville Street

Heritage, Planning, Design and Access Statement

FINAL 10.10.23

1 Introduction and Conclusions

1.1 This Heritage, Planning, Design and Access Statement has been prepared by Tibbalds Planning and Urban Design to accompany a retrospective full planning application to regularise works to the roof of 20-23 Greville Street (“the site”). The full description of development is as follows:

Full Planning Application for the relocation of plant machinery to the roof of 20-23 Greville Street

1.2 The tenant of the building has installed a different specification of an Air Handling Unit that was previously approved under 2021/3449/P. This was in order to meet the operational requirements of the building. Theis new Air Handling Unit is not visible from any street locations and therefore the visual impact of the plant is not a material planning consideration.

1.3 The tenant has held informal discussions with a neighbour to discuss the prospects of screening, which will be proposed as part of a future planning application.

1.4 The development also:

- complies with the noise levels discharged under 2022/5193/P, demonstrated by the enclosed ‘Applied Acoustic Design Plant Noise Emissions Assessment’; and
- has negligible daylight impacts as the screening is only visible when viewing the building from a southerly direction (thus looking north).

1.5 Therefore, the application must be approved.

2 Recent Planning History relating to the Roof of 20-23 Greville Street.

- 2.1 The site was originally granted planning consent (LPA ref. 2018/0910/P) for a Change of use of existing office (Class B1a) use at basement, ground and first floor to retail / restaurant (Class A1/A3) use; demolition of existing fifth floor plant room and erection of a new two storey roof extension for office use; erection of five storey rear extension; infill of rear lightwell to create storage and changing facilities at basement level; external alterations including new façade and glazing, and associated works.
- 2.2 This was granted on 19 June 2029 and was subject to 19 planning conditions. Condition 15 related to “Plant and Equipment” and stated:
- “Prior to the installation of any items of fixed plant associated with the operation of the development, details of plant machinery and a noise report shall be submitted to and approved in writing by the Local Planning Authority. The measures shall ensure that the external noise level emitted from plant/machinery/equipment will be lower than the lowest existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.*
- The report should reference the proposed noise limits included in Table 2 of the planning noise survey report dated 12 January 2018. A post installation noise assessment shall be carried out to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.”*
- 2.3 The purpose of this planning condition was to ensure that the ‘amenity of occupiers of the development site / surrounding premises is not adversely affected by noise from plant / mechanical installation / equipment as per Policy A4 of the London Borough of Camden Local Plan 2017.’
- 2.4 Condition 15 was discharged in two parts:
- “Part 1” (LPA ref. 2021/3449/P), whereby details of plant machinery and a noise report were approved on 12 October 2021. This plant machinery was to be installed as per the approved drawings (ref. Roof – db Dimension Technical Information). These plans have been included in this application pack.
 - “Part 2” (LPA ref. 2022/5193/P), whereby a post installation plant noise assessment prepared by Sandy Brown (dated 17 March 2022) was approved on 22 December 2022. This assessment confirmed that “the noise emissions from the proposed plant would not exceed the requirements of Planning Condition 15 at any time”.
- 2.5 The installation included an Air Handling Unit (“AHU”) on the roof. As demonstrated by the approved plans, this was to be located on the south-eastern area of the roof (labelled as AHU1).
- 2.6 Subsequently during fit out works, an AHU was installed in a similar location to what was previously approved under 2021/3449/P, except with larger dimensions because this was a requirement of the tenant of the building (who were not the original applicant). This was installed on the south-eastern part of the roof (in a similar location to the approved AHU) as this is the only location on the roof with sufficient access space to the AHU Specification that supported the requirements of the tenant.

- 2.7 This Full Application is to regularise this installation of a different plant to previously approved.
- 2.8 Prior to the submission of the application, the applicant held discussions with the immediate neighbour of the AHU to discuss the prospects of some screening being erected to improve the neighbour's view. These details could be provided at a later date in a separate planning application.

3 Planning Policy Considerations

- 3.1 When assessing a Full Planning application, the Local Planning Authority must consider the policies set out in the “Development Plan” and any other material considerations. The Development Plan for this application consists of:
- The London Plan (adopted 2021); and
 - The Camden Local Plan (adopted 2017).
- 3.2 Other material considerations include the National Planning Policy Framework (“NPPF”), the National Planning Practice Guidance (“NPPG”) and any other supplementary guidance such as the Hatton Garden Conservation Area Appraisal (“the CA Appraisal”). Previous planning history relating to the site is also a material planning consideration.

Material Planning Considerations

- 3.3 The NPPG sets out what a material planning consideration is (Reference ID: 21b-008-20140306). This states that:

*A material planning consideration is one which is relevant to making the planning decision in question (eg whether to grant or refuse an application for planning permission). The scope of what can constitute a material consideration is very wide and so the courts often do not indicate what cannot be a material consideration. However, in general they have taken the view that planning is concerned with land use in the **public interest**, so that the **protection of purely private interests** such as the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations (**emphasis added**).*

- 3.4 When referring to the public interest, this excludes the private views of a property (or multiple private properties, including businesses) and an application of this type must be assessed on public visual amenity or on heritage significance. As demonstrated by the photos enclosed within this application (taken on 31.08.2023) the AHU is not visible from Bleeding Heart Yard.
- 3.5 Notwithstanding the above, the following section sets out the planning analysis for the AHU location.
- 3.6 Therefore, the material planning considerations for an application for the AHU on the roof of this building are:
- Heritage and Conservation; and
 - Visual and Amenity of adjacent occupiers.

Planning and Heritage

- 3.7 When assessing a full application for development within a Conservation Area, the Council must have regard to the relevant heritage policies in the Local Plan. Policy D2 of the Camden Local Plan is the most crucial local policy relating to heritage. This policy states that:

*“The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including **conservation areas**, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets (**emphasis added**).”*

3.8 The policy also states that:

*“The Council will not permit development that results in harm that is **less than substantial** to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm (**emphasis added**).”*

3.9 Furthermore, Policy D2 also states:

*“Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will require that development within conservation areas **preserves or, where possible, enhances the character or appearance of the area (emphasis added).**”*

3.10 Therefore, the proposed development must be assessed against the above criteria set out in Policy D2 and the detailing in the relevant CA Appraisal. With regards to the specific area to the rear of 20-23 Greville Street and Bleeding Heart Yard (immediately adjacent to the development), Table 2 demonstrates the applicant’s approach to the following characteristics of the application site and surrounding area:

Characteristic	Applicant Analysis
<p>The site falls within “Sub-area 3: The Trading Centre” (identified in the CA Appraisal). This states that the Bleeding Heart Yard is important as a large yard with lower building heights, irregular outlines and a strong sense of enclosure (paragraph 5.8 of the CA Appraisal);</p>	<p>The AHU does not alter the sense of enclosure within the yard and does not alter the building height to what has already been approved within the site. This therefore preserves this particular characteristic of the Conservation Area.</p>
<p>Sub area 3 has a varied architectural period, style, materials and height. The most common building types have a stock brick, red brick and Portland stone and roof slate (paragraph 5.11 of the CA Appraisal). Paragraph 9.3 of the CA Appraisal also sets out common materials that are in use within the Conservation Area. This includes red brick, London stock brick and Portland stone, with slate for roofs.</p>	<p>The existing building does not have similar materials to the typical characteristics set out in paragraph 5.11 of the CA Appraisal. The AHU is a requirement of the building’s operation and the materials of these were approved under (LPA ref. 2021/3449/P). This therefore preserves the appearance of the Conservation Area.</p>
<p>1-7 Bleeding Heart Yard is regarded as having a positive contribution to the Conservation Area (paragraph 6.3 of the CA Appraisal);</p>	<p>Buildings that make a contribution to the Conservation Area have been selected on the basis of their value as local landmarks, positive contribution to their townscape or are as good examples of the type of building. 1-7 Bleeding Heart Yard is selected as one of these as being a typical building as part of a large yard area with a lower building in comparison to the surrounding buildings.</p>

	<p>The plant is not visible from any public vantage point in Bleeding Heart Yard, and therefore there is no assessment of the impacts required for this.</p>
<p>20-23 Greville Street was regarded as a building that makes a negative contribution to the Conservation Area (paragraph 6.4 of the CA -</p>	<p>The CA Appraisal was published in 2017, prior to the development of the roof extension on the site. In the delegated report, the LPA stated that the design concept for that proposal was supported by the design panel (8.10 of the Committee Report for 2018/0910/P). In the Heritage Statement submitted with 2018/0910/P this mansard was part of a scheme that would preserve and even enhance the character of the area.</p> <p>The AHU does not change this characteristic and so this clearly preserves this previous assessment.</p>

Heritage Conclusions

3.11 As demonstrated by Table 2, the AHU is not visible from any public vantage point and therefore makes no changes to the setting of the Conservation Area.

Visual and Amenity Impacts

3.12 Policy D1 of the Camden Local Plan 2017 aims to achieve the highest standard of design in all developments, which improves the function, appearance, and character of the area.

3.13 When determining a planning application, an assessment of design is made on visual impacts that a development has the street scene and therefore the street level and the quality of materials that are selected.

3.14 As the AHU is set back from the roof parapet, there would be no visibility of the AHU from the street level as demonstrated by site photos included). As the AHU is not visible from the street scene, there are no visibility or design impacts on the street.

3.15 In terms of other amenity impacts, the applicant has considered the following points:

- **Noise:** As set out by the accompanying Plant Noise Emissions Assessment, prepared by Applied Acoustic Design, the sound rating level was calculated 1 metre from the worst affected window of the nearest noise sensitive receiver. The calculated rating level of the window in question was 39 dB which is compliant with the weekend day-time and night-time operation noise limits of 42dB. Given that the nearest residential property is further away than the nearest window, where the measurements were taken, the noise rating is guaranteed to be lower than the 39

dB figure measured. Therefore, there are no adverse noise impacts beyond those agreed in condition 15 of 2018/0910/P;

- Visual: as confirmed by site photos, the plant is not visible from the street and so there are no visual amenity impacts caused by the plant; and
- Daylight and Sunlight: the new AHU has negligible impacts on daylight, as this is only visible when looking in a northerly direction.

4 Design and Access Statement

- 4.1 As part of this application, the following details are included for the purposes of Design and Access of the AHU and the proposed screening. The Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the requirements for a Design and Access Statement. These are set out below with the information relevant to the development in *italics*.
- 4.2 A Design and Access Statement must:
- explain the design principles and concepts that have been applied to the development – *the AHU has been installed according to the specification set out by Sovereign Air Movement (enclosed document: AHU Technical Data)*.
 - demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account – *there are no design implications caused by the installation of the AHU, therefore no appraisal is required*.
 - explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account – *the building and roof will be accessed as per the access arrangements for the approved scheme 2018/0910/P;*
 - state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation – *there are no further access to address*.
 - explain how any specific issues which might affect access to the development have been addressed – *access arrangements have not changed following the original approved application 2018/0910/P*.