

Development Management  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
WC1H 9JE

**Date:** 26<sup>th</sup> September 2024  
**Our ref:** 64743/01/SSL/JTh/25897662v2  
**Planning Portal ref:** PP- 12399222

Dear Sir/Madam,

**100 New Oxford Street, London, WC1A 1HB**

## **Application for Full Planning Permission for Installation of rooftop plant and associated works**

On behalf of our client, 100 Nox SARL ('the applicant'), please find enclosed a full planning application seeking approval for installation of new rooftop plant at 100 New Oxford Street, London, WC1A 1HB ('the application site').

### **Application Submission**

This planning application has been submitted via the Planning Portal (ref. PP- 12399222) and comprises of the following documents:

- 1 Completed Application Form including Ownership Certificates;
- 2 This Covering Letter, prepared by Lichfields;
- 3 Application Drawings as detailed within Annex 1; and
- 4 Plant Noise Assessment Report (dated September 2024) prepared by Cahill Design Consultants.

A CIL Additional Information Form has also been submitted. The application fee of £578.00 (+£70.00 Planning Portal admin fee) has been made online via the planning portal.

### **Background and Proposed Development**

The application site is outlined in red on the accompanying Site Location plan (drg. No: PL.701) and comprises the rooftop of a nine-story building with a continuous retail and commercial frontage at ground floor and commercial floorspace on the floors above. The existing building is not listed but is located within the Bloomsbury Conservation Area. There are a number of listed buildings in the vicinity.

Our client is proposing to install additional air conditioning plant which are sought to ensure high quality, comfortable, lettable space to meet tenant expectations.

The proposed plant at rooftop are detailed on the submitted drawings (Proposed Roof Plan drg. No: 5365-LII-ZZ-B-DR-I-3501, Rev 2 and Proposed Elevation Roof Plant drg. No: 5367-LII-ZZ-B-DR-I-3503). The plant will not be visible from street level as it will be hidden by existing screening at roof level.

### **Policy Context**

The relevant statutory development plan for decision making in respect of this application consists of:

- 1 The London Plan (March 2021);
- 2 The Camden Local Plan (July 2017); and
- 3 Fitzrovia Area Action Plan (March 2014).

Design guidance for building services equipment is also a material consideration, as per the Camden Planning Guidance: Design SPD (January 2021).

Planning policies deemed potentially relevant to the determination of this planning application are detailed as follows:

#### **London Plan (LP)**

- Policy SD4 The Central Activities Zone (CAZ)

#### **Camden Local Plan (CLP)**

- Policy D1 Design
- Policy D2 Heritage
- Policy A4 Noise and Vibration

#### **Other Material Considerations**

- Camden Planning Guidance: Design SPD, Section 9 (Building services equipment)

### **Planning Assessment**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 establishes that planning applications should be determined in accordance with the policies of the statutory development plan, unless material considerations demonstrate otherwise.

Camden Policies Map (2021) designates the application site within the Central London Area and the Bloomsbury Conservation Area. In regard to the historic environment, Policy D2 (Heritage) seeks to preserve, and where appropriate, enhance the Borough's heritage assets.

Policy A4 (Noise and Vibration) is also relevant – the policy seeks to ensure that noise and vibration is controlled and managed. These policy considerations are addressed accordingly below.

#### **Noise**

Local Plan Policy A4 (Noise and Vibration) seeks to ensure that noise and vibration is controlled and managed. The policy notes that for any noise generating development, including any plant, will only be acceptable if it can be operated without causing harm to amenity. Appendix 3 (of the CLP) also sets out noise thresholds for proposed industrial and commercial development including plant and machinery.

The location of the plant is at rooftop level, with the nearest noise-sensitive receptors to the north of the site (The Bloomsbury Hotel and Radisson Blu Hotel).

A Plant Noise Assessment Report has been prepared by Cahill Design Consultations and confirms that the accumulative plant noise levels emitted (from the existing and proposed plant units) are assessed to be as follows, at the relevant noise-sensitive receptors:

- The Bloomsbury Hotel – 15dB *below* the typical daytime background levels and 13dB *below* night-time noise levels;
- Radisson Blu Hotel – 10dB *below* the typical daytime background levels and 8dB *below* night-time noise levels.

CLP (Appendix 3) in this regard confirms the cumulative rating noise level emitted from operational plant should be at least 10dB below the typical existing background sound levels.

Whilst this threshold is satisfied at the Bloomsbury Hotel, some of the top guestrooms of the Radisson Blu Hotel are anticipated to be 8dB below the typical existing background levels at nighttime.

However, the Plant Noise Assessment Report confirms that no mitigation measures are deemed necessary given the applicant proposes to reduce the cumulative impact of plant noise by operating all units in a 'low noise mode' during the nighttime, as per the specifications of the proposed plant units. This is expected to render noise levels at the Radisson Blu Hotel acceptable during nighttime.

This demonstrates compliance with the requirements of Camden's Local Plan Policy A4 and London Plan policy.

### **Design & Heritage**

In accordance with the requirements of the Council's Planning Guidance: Design SPD – Section 9, the proposed equipment will:

- Not harm occupant or neighbour amenity health or wellbeing;
- Be incorporated into the building aesthetically;
- Have a minimal impact on the environment; and
- Not harm any listed buildings, conservation areas or streetscapes.

The new plant will be located at roof level, behind an existing screened area, and is therefore not considered to be visually obtrusive. The principle of this location for plant units is well established given the presence of existing plant within the same area (see Existing Roof Plan drg. No: 5365-LII-B-DR-I-3500 and Proposed Roof Plan drg. No: 5365-LII-ZZ-B-DR-I-3501, Rev 02). Given the proposed location and presence of screening, the proposal would not have a negative impact on the host building, nor the Bloomsbury Conservation Area or nearby heritage assets.

The proposed development raises no conflict with the SPD guidance, nor Local Plan Policies D1, D2 or D4.



**Concluding Remarks**

We trust the enclosed information is satisfactory to enable the Council to validate and determine this application within the statutory period. However, should you require any further information, please do contact me at this office.

Yours faithfully,

Joe Thompson  
**Senior Planner**

**Annex 1: Schedule of Application Drawings**

Drawing Title	Drawing Ref.	Scale
Site Location Plan	PL.701	1:1250 @A4
Existing Roof Plan	5365-LII-ZZ-B-DR-I-3500	1:100 @A0
Proposed Roof Plan	5365-LII-ZZ-B-DR-I-3501 (Rev 02)	1:100 @A0
Existing Elevation Roof Plant	5367-LII-ZZ-B-DR-I-3502	1:100 @A0
Proposed Elevation Roof Plant	5367-LII-ZZ-B-DR-I-3503	1:100 @A0