

Camden Council  
5 Pancras Sq,  
London  
N1C 4AG

**Date:** 21 February 2025  
**Our ref:** 61338/01/PR/DD/33469686v1

To Whom It May Concern

## **Camden Council: 79-81 Euston Road**

On behalf of the applicant, STP Propco Limited, we have submitted an application for planning permission for the following works at the above property:

*“Installation of replacement roof plant and associated duct work (including new acoustic screen), replacement roof safety rail and replacement windows. Repair works to existing render façade and curtain wall”*

The application comprises:

- 1 Signed and dated application form;
- 2 CIL Additional Information Form;
- 3 This cover letter;
- 4 Application drawings prepared by AMA Studio;
- 5 Cooling Hierarchy Assessment prepared by Patrick McCaul Building Services & MEP Consulting Engineer
- 6 Noise Impact Assessment prepared by Red Twin Limited; and
- 7 Photograph Pack for information purposes only.

A payment for the application fee has been made via the Planning Portal.

## **Background**

The site is in use as a hostel but is in a poor state of disrepair. The applicant is renovating the building to bring it up to modern standards. As part of this it is necessary to replace the obsolete rooftop plant (see Photograph Pack) which doesn't meet current standards of energy efficiency.

The upper floor windows of the building are also in a poor state of repair and don't meet noise and efficiency standards. Their replacement is included within this application for completeness, alongside the replacement of existing rooftop safety rails and repair works to the existing façade.

### **The Proposal**

This application seeks planning permission for the following works:

- Replacement roof plant comprising removal of existing plant equipment and duct work and installation of 5 Air Conditioning Condensers, 1 Air Handling Unit (and plant screen) and 1 Generator and Smoke Fan with associated duct work;
- Replacement of existing roof-level safety rail with new safety rail which meets current building regulations requirements;
- The like-for-like replacement of existing windows on 1<sup>st</sup> floor upwards which would be the same size, appearance and fenestration pattern; and,
- Repair works to the existing insulated render façade and curtain wall to match the existing colour

### **Planning assessment**

Decisions on planning applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. In this case the development plan comprises:

- The London Plan 2021
- The Camden Local Plan 2017

Design guidance for building services equipment is also a material consideration, as per the Camden Planning Guidance: Design SPD (January 2021). Another important material consideration in decision-making is the National Planning Policy Framework (NPPF, 2024).

The proposals within this application are assessed against this policy context below.

### **Principle of development**

London Plan Policy E10 outlines that London's visitor economy should be strengthened through supporting infrastructure. The proposed plant, rails and replacement windows are required to support the continued operation of the Kabannas Hostel following the obsolescence of existing plant, windows and render façade.

The proposal provides crucial infrastructure and other works to enable the hostel to provide to modern standards of accommodation which will support the visitor economy in Westminster, in line with policy.

### **Design**

Local Plan Policy D1 (Design) states that the Council will seek to secure high quality design and specifically requires that development "*carefully integrates building services and equipment*".

The principle of this location for plant units is well established given the presence of existing plant within the same area and the layout of the replacement plant responds to this by:

- the laying of replacement ductwork on the surface of the roof which would be set back from the parapet edge and would mirror the scale of the existing ductwork;
- the addition of a new generator within the existing plant enclosure which would be entirely concealed;
- the replacement of existing air conditioning condensers sited directly adjacent to the existing plant enclosure which would be set back from the parapet edge; and,
- replacement of the existing air handling unit in the same location as currently sited and erection of an acoustic plant screen for noise mitigation purposes

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 it will
- not harm any listed buildings, conservation areas or streetscapes.

When considered in the context of the whole hotel building, the proposed scale of the plant is subservient and has been designed to be of a size and appearance that is sensitive to its setting and would not result in any undue detrimental impact to the character of the host building nor the immediate surrounding area.

With respect to consideration of the visual impact of the plant and safety rail from surrounding buildings, the surrounding street level, and more generally in surrounding views, it is noted that the impact will be very limited given the comparative scale and siting of the proposals in relation to the existing plant equipment and safety rail and other buildings in the area.

The proposed window replacement would not materially affect the external appearance of the building as a whole given that proposals replace the existing windows on a like-for-like basis in the same size, appearance and fenestration pattern. Similarly, the proposed repairs to the render façade and curtain wall would maintain and improve the existing appearance of the building using the finish colour currently in situ.

On this basis, the proposed development would not detract from the character and appearance of the host building and the area. The proposals are in accordance with identified planning policy in respect of design.

## **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.

Plant Noise Assessment Report has been prepared by Red Twin Limited and 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. As such there would be no adverse impacts and the proposals comply with the requirements of Camden's Local Plan Policy A4 and London Plan policy.

### **Cooling Hierarchy**

Local Plan Policy CC2 (Adapting to climate change) requires development to adopt appropriate climate change adaptation measures. Of relevance to this application is the requirement to reduce the impact of urban overheating through the application a cooling hierarchy.

In accordance with this requirement, a Cooling Hierarchy Compliance Statement is submitted with this application. It details where the Cooling Hierarchy has been fully considered and where feasible appropriate passive measure have been implemented to reduce the cooling demand before consideration has been given to energy efficient air conditioning.

### **Conclusion**

We trust that we have provided you with sufficient information to validate and determine the application. However, should you have any questions or require further information, please do not hesitate to contact me.

Yours faithfully

### **Dan Di-Lieto**

Associate Director

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