

**THE BEDFORD ESTATE AND  
THREADNEEDLE PROPERTY  
INVESTMENTS**

**HEALS/HABITAT  
TOTTENHAM COURT ROAD  
LONDON  
W1C**

**PLANNING STATEMENT**

**December 2011**

**CONTENTS**

<b><u>Section</u></b>		<b><u>Page No.</u></b>
1.0	Introduction	1
2.0	The Site and Planning History	2
3.0	The Proposals	4
4.0	Planning Policy	5
5.0	Assessment of Proposals	6
6.0	Conclusions	11

Appendix 1 – Statement of Community Involvement

## **1.0 INTRODUCTION**

- 1.1 This planning statement has been prepared by Montagu Evans on behalf of Threadneedle Asset Management Limited and the Bedford Estate in support of the proposals for the Heal's and Habitat Building.
- 1.2 The proposals are for the refurbishment and extension of the common parts of the office areas of the building to provide:
- A sensitive extension for a new core, with minimal intervention in the building's fabric;
  - Disabled Access;
  - Improved access and circulation to all floors;
  - Improved sustainability credentials;
  - Rationalisation of existing plant;
- 1.3 The proposals do not affect the Heal's and Habitat retail space, only the office accommodation to the rear and on the upper floors which is accessed via Torrington Place.
- 1.4 This statement assesses the proposals against development plan policy in respect of the land use principles of the scheme. The proposals are assessed in relation to their effect on heritage assets and townscape in the Heritage Statement which accompanies the application and is prepared by John McAslan and Partners. The Heritage Statement assesses the schemes compliance with the Statutory Tests together with guidance contained within PPS5, the London Borough of Camden's Core Strategy and Development Planning Policies Development Plan Document.
- 1.5 The proposals follow on from pre-application discussions with the planning and design and conservation officers at the London Borough of Camden. Pre-application discussions have also taken place with English Heritage.
- 1.6 A public consultation exhibition was held on the 15 November 2011 for local residents who are in proximity to the site and may be affected by the proposals. Letters were also sent to Ward Councillors and local amenity societies informing them of the proposals and offering further information if required.
- 1.7 Following these discussions, the applicant has now developed the proposals for a detailed planning and listed building consent applications. This statement should therefore be read in conjunction with the following documents:

- Application Drawings – prepared by John McAslan and Partners;
- Design and Access Statement – prepared By John McAslan and Partners, including;
  - Structural Report – prepared by Cundalls;
  - Mechanical and Engineering Report prepared by Cundalls;
  - Sustainability and energy assessment – prepared by Cundalls;
  - Acoustic Report – prepared by Phillips Acoustics;
  - Daylight / sunlight assessment – prepared by Delva Patman; and
  - Air Quality Assessment – Air Quality Consultants
- Heritage Statement – prepared by John McAslan and Partners;



## **2.0 THE SITE**

### **Location**

- 2.1 The site is located in the southern most part of the borough of Camden. More specifically it is to the east of Tottenham Court Road, just to the north of Goodge Street Tube Station. The site is bordered by Torrington Place to the north, Alfred Mews to the south, and Tottenham Court Road to the west. Residential properties on Huntley Street adjoin the site from the east.

### **The Building**

- 2.2 The site and buildings have evolved in accordance with the changing needs of the occupier since the original block was constructed on site in the 1850's. Consequently, the site comprises a series of buildings that have become interwoven, albeit with distinct designs and periods of construction.
- 2.3 To Tottenham Court Road the building is four storeys in height, with the southern (Heal's) building constructed first. It is faced in Portland Stone and the ground floor shop fronts are recessed behind a pillastered arcade, with cornice separating the ground and first floors. The rhythm of the upper façade reflects the pattern of pilasters below, with columns dividing the façade into a rhythm of 3 bays of windows interspersed with a single bay. The windows are white timber casements. The façade is finished by a heavy cornice concealing the attic storey.
- 2.4 The northern building (Habitat) is a 1960's addition, also faced in Portland stone and comprising four storeys, with the ground floor recessed behind an arcade. The framing and floor levels of the building reflects the spacing of the Heal's building, but with a modern design and limited detailing. The attic storey is recessed and with a concrete frame cantilevered out to a point level with the floor below.
- 2.5 To Torrington Place, there are two further distinct stages of development. A 1930's brick building and a 1960's office building which connects to the Habitat Building on Tottenham Court Road.
- 2.6 To the rear of the site (south east) are the older ranges of brick construction and more reflective of the sites industrial origins as a furniture maker.
- 2.7 Vehicular access is taken from Torrington Place, through to an uncovered off street service area for the retail units. There is also a ramp that leads from the service yard down to basement level where there is provision for off street parking and cycle storage associated with the office accommodation.
- 2.8 There is a separate office entrance to Torrington Place which leads to the upper floors of all office areas associated with the building.

### **Heritage Designations**

- 2.9 The building is grade II\* listed and falls within the Bloomsbury Conservation Area. A full assessment of the conservation area is set out within the separate Heritage Assessment prepared by John McAslan and Partners.

### **Other Designations**

- 2.10 The Tottenham Court Road frontage is designated as a Central London Shopping Frontage and the site as a whole is within the 'Central London Area'. The site also falls within the Strategic Viewing Corridor from Parliament Hill Oak tree to the Palace of Westminster.

### **Relevant Planning History**

- 2.11 We have conducted an online review of the planning history of the site and have not found any applications to be particularly relevant to the scope of the works proposed under this application.

### **3.0 THE PROPOSALS**

#### **Summary of Proposals**

- 3.1 The proposals focus on the refurbishment and upgrade of those areas of the building which are in office use, to provide level access, circulation and the energy performance of the offices.

#### **Lightwell**

- 3.2 The main proposals are for the enclosure of the lightwell to the rear of the office entrance on Torrington Place with a lightweight glazed structure. Alterations to the stair, just beyond the Torrington Place reception, allow level access through to the Courtyard.
- 3.3 As a result the stairs are reconfigured so that they project into the lightwell area and provide access, to first floor level through the external wall. The windows on the western side of the lightwell will be dropped down and recessed to provide an informal seating area.

#### **Courtyard**

- 3.4 Beyond the lightwell, through an undercroft, is an open 'L' shaped courtyard, enclosed by five storey buildings to the east and west, with three storey buildings to the south and east.
- 3.5 The gap between the five storey buildings is in-filled to create a glazed enclosure, which will house a lift shaft. The shaft will connect to crosswalks that will link together the five storey buildings either side of the courtyard (east to west). This will provide level access to the rear of the office buildings.
- 3.6 At first floor level, the cross walk is extended to connect with the southern most building.
- 3.7 The remainder of the courtyard at ground floor level will be landscaped to provide an outdoor seating area.

#### **Office Entrance**

- 3.8 Minor alterations are proposed to the office entrance on Torrington Place, to give the entrance greater presence with the streetscene.

**Plant**

- 3.9 The existing plant is inefficient and life expired. It will therefore be replaced and rationalised, within appropriate enclosures. The new plant will be more efficient and will comply with the Council's standard noise criteria through specification of the plant and screening, following the results of the 24hr background noise survey. It is proposed to locate this at roof level in three areas, to serve distinct parts of the building.

**Alternative Means of Transport**

- 3.10 52 Cycle racks are provided in the basement for the office accommodation, together with 52 lockers and 6 showers.

**Sustainability**

- 3.10 The enclosure of the lightwell and part of the courtyard will improve the thermal efficiency of the existing buildings by creating an intermediary space. The space will not be heated but will rely on solar gain and heat lost from the buildings.
- 3.11 The proposals also provide 340 sq m of green roofs on separate areas of roofs where possible. Other sustainability upgrades include:
- Low flow showers /Taps/WCs
  - Solar Thermal Hotwater
  - Air/Source Heat Pumps
  - 100% Low Energy Lighting
- 3.12 The application proposals have undergone a pre-bream assessment and been found to achieve Breeam (Very Good), which in the context of a Grade II\* listed building is a good achievement.



#### **4.0 PLANNING POLICY**

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies of the statutory development plan, unless material considerations indicate otherwise.
- 4.2 The Development Plan for the area comprises:
- the London Plan 2011
  - the London Borough of Camden Core Strategy (Nov 2010); and
  - the London Borough of Camden Development Policies, Development Plan Document (Nov 2010).
- 4.3 Therefore, these are the relevant documents in assessing the planning application. We acknowledge that the Council are preparing their Site Allocations Development Plan Document.
- 4.4 A full assessment of heritage matters in terms of statute and policy is contained within the Heritage Statement and therefore is not considered in detail in this planning statement.
- 4.5 Various Supplementary Planning Guidance and Documents are also relevant to the proposals, including Camden Planning Guidance 5 – Town Centres, Retail and Employment, and Sustainability – Camden Planning Guidance 3. This is a material consideration in the determination of the application.
- 4.6 The proposals are assessed against this policy framework in the following section.

## 5.0 ASSESSMENT OF PROPOSALS

### Land Use – Principle of Office Accommodation

- 5.1 The site has evolved over a period approximately 150 years, consequently the access, linkages and routes through the building are interwoven and thus difficult to navigate. Furthermore, the majority of the office accommodation has not been refurbished for approximately 30 years. Consequently, the proposals are for a marginal uplift in floor area to rationalise the layout, improve access for all persons and improve the energy efficiency of the building, to make it fit for purpose over the next 25-30 years of its life.
- 5.2 John McAslan and Partners have been appointed in order to explore ways in which to achieve this and have achieved it in a way that results in minimal intervention with the building's fabric and is therefore sensitive to the listed building.
- 5.3 The London Plan and the adopted Core Strategy, support the upgrade and provision of additional office accommodation, in order to meet business needs and enhance London's competitiveness as a place to do business (Policy 4.2 of the London Plan and policy CS8 of the Core Strategy). Policy CS9 of the Core Strategy specifically supports office growth in Tottenham Court Road.
- 5.4 Policy DP1 of the Core Strategy advises that where proposals provide 200 sq m (gross) additional floorspace, the Council will seek *up to* 50% percent of additional floorspace to be provided as residential accommodation. In applying this policy the Council acknowledges that there are particular issues which may affect whether a site is capable of accommodating residential accommodation and in particular identify the following:
- the character of the development, the site and the area;
  - site size, the extent of the additional floorspace, and constraints on including a mix of uses;
  - the need for an active street frontage and natural surveillance;
  - the economics and financial viability of the development including any particular costs associated with it;
  - whether the sole or primary use proposed is housing;
  - whether secondary uses would be incompatible with the character of the primary use;
  - whether an extension to the gross floorspace is needed for an existing user;
  - whether the development is publicly funded;
  - any other planning objectives considered to be a priority for the site.

- 5.5 We therefore examine these points, where relevant, below.

**Character of development, the site and area**

- 5.6 In this instance, the driver of the scheme is to improve circulation and disabled access to a grade II\* listed building, which has been constructed in several phases over a considerable period of time. As a result the building has 'warren' of corridors and no legibility in terms of its access and escape routes for its occupants.
- 5.7 The proposals therefore are not about the introduction of new commercial office space capable of occupation, but the utilisation of external areas of the site (courtyards and lightwells) to sensitively upgrade and improve access to the existing office accommodation, whilst also enhancing its sustainability credentials.

**Site size, the extent of the additional floorspace, and constraints on including a mix of uses**

- 5.8 Normally improvements of the nature proposed could be incorporated wholly within a building by rationalising layouts floor levels and the need for cores. However in this case the buildings listed status has serious practical implications. Consequently the extent of new floorspace is limited to that required to achieve the objectives of disabled access and improved sustainability.
- 5.9 The proposals do not therefore provide alterations or interventions to the listed building to the extent that they could provide a mix of uses.

**The need for an active street frontage and natural surveillance**

- 5.10 The proposals are accessed through the existing office entrance from Torrington Place. The proposals provide natural surveillance at ground floor level and there is no opportunity in the frontage at this point to provide an office entrance as well as an alternative use at ground floor level. We also note that the Torrington Place frontage has a parade of shops either side of the entrance and has high levels of footfall as a result of its proximity to Tottenham Court Road.

**The economics and financial viability of the development including any particular costs associated with it**

- 5.11 As discussed above the proposals relate to the upgrade of the access to the building, there is therefore no net additional lettable floorspace associated with the proposals, contributions or off site provision would be punitive, given the proposals for the upgrading of the building to meet sustainability and DDA requirements.



**Whether the sole or primary use proposed is housing?; Whether secondary uses would be incompatible with the character of the primary use?**

- 5.12 The primary use of the building is for office purposes. In the area within which the alterations are proposed, secondary uses are not compatible with the character and nature of the design. The proposals for the building, have been designed to maintain an open character which allow the original fabric and spaces to be appreciated.

**Whether an extension to the gross floorspace is needed for an existing user?**

- 5.13 The existing building is let on a multi-tenant basis. The proposals are of benefit to all current occupiers of the building and their visitors, providing them with improved access, circulation, energy efficiency and associated facilities (such as cycle storage, lockers and showers).

**Whether the development is publicly funded?**

- 5.14 The development is not publicly funded.

**Any other planning objectives considered to be a priority for the site?;**

- 5.15 The objectives of the projects are all objectives of the Development Plan for Camden; namely:
- Improved access arrangements for all persons;
  - Improved energy efficiency and environmental performance;
  - Installation of Cycle Storage, Lockers and Showers; and
  - Preservation and enhancement of a listed building to make sure it meets the needs of future generations and will be beneficially occupied for years to come;

**Summary**

- 5.16 Consequently, it is our view that policy DP1 should not be applied in this case and that residential accommodation should not be sought, due to the fact:
- The proposals only exceed 200 sq m, due to the fact they cannot be achieved through internal alterations due to the buildings listed status;
  - The proposals fully accord with other development plan objectives;
  - The proposals cannot provide residential accommodation without significant further intervention to the listed building; and
  - The proposals do not provide any floorspace capable of occupation for business purposes.

**Design**

- 5.17 A full consideration of the significance of the existing listed building and the impact of the proposals upon that significance are set out fully in the PPS5 Statement which accompanies the application.



### **Alternative Means of Transport**

- 5.18 The proposals provide 54 cycle racks in total at basement level, with 36 lockers and 3 showers at basement level. A further 2 showers and 18 lockers are provided at ground floor level.
- 5.19 There are currently limited cycle racks on site and no associated facilities. The proposals therefore fully accord with policy CS 11 of the Core Strategy and DP17 of the Development Management Policies DPD.

### **Disabled Access**

- 5.20 A full access audit has been carried out for the property to analyse the existing issues with the building. A full appreciation of the issues is provided in the design and access statement which accompanies the application. However, the key points are that the building has focussed on providing level access to the office building from the entrance at street level on Torrington Place, to the ground and upper floors of the office building via a new lift core. Associated alterations are made internally to accommodate disabled access requirements.
- 5.21 The proposals therefore fully embrace the aspirations of Policy DP29 (Improving Access).

### **Sustainability**

- 5.22 The proposals to enclose the lightwell and part of the courtyard will provide an intermediary space between buildings and as such the present external walls of the existing building will not experience the same temperature fluctuations as if it were exposed to the elements.
- 5.23 The proposals also involve the replacement installation of new plant to serve the office accommodation. This will significantly improve the energy efficiency of the building.
- 5.24 The initial Breaam Pre-Assessment confirms that the proposals can achieve a 'Very Good' rating, with 60% of credits being achieved for the Water and Energy sections and 40% on the materials section. The proposals therefore meet the aspirations of policy CS13 of the Core Strategy and DP22 of the Development Plan Policies.
- 5.25 Specific elements of the proposals include,
- 100% Low Energy Lighting
  - Air Source Heat Pumps
  - Solar Thermal
  - Green Roofs,
  - Cycle Racks,
  - low flow toilets, showers and taps.

### **Noise**

- 5.26 At the public consultation evening this was raised by residents as one of their biggest concerns due to other recent construction activity and other plant which has failed to meet with the Council's prescribed standards. Consequently this aspect of the proposals has been looked at in a great level of detail
- 5.27 London Plan Policy 4A.20 relates to noise. It seeks to ensure that boroughs reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals. Local policies CS5, DP26 and DP28 all deal with the production, reduction and prevention of noise and adverse impacts on amenity.
- 5.28 As discussed above the proposals seek to install new plant at roof level. A noise study has been undertaken in order to establish current background noise levels. Almost all the plant and equipment serving the new building is within the basement, with a further small amount accommodated within plant areas at roof level. This means that the potential for noise outbreak is low, and consequently we have been able to confirm that this plant can be introduced without any noticeable impact on noise levels.
- 5.29 Consequently a background noise survey has been undertaken by Cundalls. This sets the criteria within which the new plant will have to operate on. The specifications of the plant are included within the application demonstrating that the required noise levels are achievable.

### **Noise and Disturbance During Construction**

- 5.30 There is potential for noise to manifest itself in during construction and once the development is occupied. These are discussed below and should be read in conjunction with the attached Acoustic Report written by Cundalls, and the Construction Management Plan prepared by TFT.
- 5.31 The Construction Management Plan sets out the key measures to be put in place to reduce any potential for disruption from noise during construction. This document sets out in detail the measures to be put in place to address noise and disturbance during the construction phase. In summary, these include measures such as;
- restricting noisy work to agreed set hours
  - using noise attenuated equipment where possible
  - Hoarding the site
  - carefully managing the arrival and departure of all vehicles
  - providing wheel washing and cleaning facilities for vehicles arriving and leaving
  - providing facilities for site operatives in order to minimise their need to leave site during the working day
  - providing 24 hour contact numbers for local residents in case of any problems
  - liaising with other nearby developments to coordinate activity (eg Guinness)
  - setting up a residents liaison group

- issuing regular newsletters.

5.32 Any contractor will be required to be a member of the considerate constructor's scheme.

**Landscaping**

5.33 There is limited opportunity for landscaping on site. However once the proposals are completed the external courtyard will be upgraded and landscaped to provide a more useable external amenity space.

## **6.0 CONCLUSION**

- 6.1 The principle of additional office accommodation is supported in the Central London Area. While the proposed floorspace is marginally in excess of 200 sq m, it is evident from the proposals that the improvements proposed do not result in what could be considered a commercial area capable of occupation. It is instead, a secondary area to the main lettable office accommodation aimed at upgrading the building to provide disabled access and improve legibility. It therefore appears to us that policy DP1 should not be applied in this instance.
- 6.2 In addition to the improved access to the building, the proposals also provide a significant number of sustainability benefits: including:
- Green Roof;
  - New energy efficient plant;
  - Cycle Racks
  - Lockers / Showers
  - Low flow showers / toilets/ taps
- 6.3 Furthermore the design is of a high quality and is fully in keeping with the listed building, resulting in minimal intervention in its fabric. It therefore is considered that the proposed works would preserve the special interest of the listed building, in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, PPS5, and Core Strategy Policy CS14 and policy DP24 and DP25 of the Development Management Policies DPD
- 6.4 For the reasons above we consider that planning permission and listed building consent should be granted.



## **Appendix 1**

### **Statement of Community Involvement**

**THE BEDFORD ESTATE AND  
THREADNEEDLE PROPERTY  
INVESTMENTS**

**HEALS/HABITAT  
TOTTENHAM COURT ROAD  
LONDON  
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**STATEMENT OF COMMUNITY  
INVOLVEMENT**

**December 2011**

## **CONTENTS**

<b><u>Section</u></b>		<b><u>Page No.</u></b>
1.0	Introduction	1
2.0	The Policy Context	2
3.0	The Consultation Process	4
4.0	Response to Public Consultation	6
5.0	Conclusion	7

## **1.0 INTRODUCTION**

- 1.1 This Statement has been prepared to accompany a planning application by Threadneedle Asset Management and the Bedford Estate for the refurbishment and extension of the common parts of the office areas of the Heals and Habitat building to provide:
- A sensitive extension for a new core, with minimal intervention in the building's fabric;
  - Disabled Access;
  - Improved access and circulation to all floors;
  - Improved sustainability credentials;
  - Rationalisation of existing plant;
- 1.2 The proposals do not affect the Heal's and Habitat retail space, only the office accommodation to the rear and on the upper floors which is accessed via Torrington Place.
- 1.3 Full details of the application proposals are set out in the Design and Access Statement prepared by John McAslan and Partners submitted in support of the application.
- 1.4 This report details the pre-application public consultation exercise undertaken prior to preparing the application, highlights its main findings and explains where possible public comment has influenced the overall design and form of the application.



## 2.0 THE POLICY CONTEXT

### Central Government Advice

- 2.1 The Planning & Compulsory Purchase Act 2004 came into force at the end of September 2004. One of the central purposes of the Act is to improve community involvement in the planning process.
- 2.2 The Government has made it clear in the guidance accompanying the new legislation that developers should be encouraged to undertake public consultation, particularly on major developments.
- 2.3 Planning Policy Statement (PPS) 1: 'Creating Sustainable Communities', published in February 2005, encourages local authorities and developers to engage local stakeholders and community groups in bringing forward development proposals. This *"helps to identify issues and problems at an early stage and allows a dialogue and discussion of the options to take place before proposals are too far advanced"* (Paragraph 11).
- 2.4 Further advice on public consultation is provided by 'Community Involvement in Planning: the Government's Objectives', which place heavy emphasis on the importance of consulting with local communities early in the planning process:
- "We would expect.... to encourage developers to undertake pre-application discussions and early community consultation on significant applications...."
- (paragraph 3.18)

### Local Planning Authority Advice

- 2.5 The London Borough of Camden's Statement of Community Involvement (SCI) was adopted in July 2011. This document sets out the Council's policy in relation to public consultation and community involvement in the planning process.
- 2.6 In light of the London Borough of Camden Guidance, the Bedford Estate, Threadneedle Asset Management and their advisors have complied with the Council's current thinking on pre-application consultation for development proposals. This has proved useful in terms of identifying key local stakeholders and also the timing and nature of the public consultation exercise.

### Client Response

- 2.7 Montagu Evans is fully aware that the development will be of interest to the local community. In response to this public interest, and both local and central policy on public consultation in the planning process, the Bedford Estate and Threadneedle Asset Management decided that it would be appropriate to undertake public

consultation on its redevelopment proposals, prior to the submission of the planning application.

### **3.0 THE CONSULTATION PROCESS**

#### **Methodology and Design**

- 3.1 The proposals are small scale in their nature, but nevertheless a full consultation has been undertaken. The programme of consultation for the application used a variety of consultation techniques designed to reach as wide a cross section of the local community as possible. The various techniques used are described in the following sections.

#### **3.2 Information to Stakeholders**

Letters were sent out to the Bloomsbury Association, Charlotte Street Association, and the Bloomsbury Conservation Area Committee, together with Local Ward Councillors advising them of the proposals and offering to meet to explain the proposals in greater detail.

- 3.3 Letters were also sent out to 175 addresses, on Huntley Street, Torrington Place and Chenies Street and Tottenham Court Road inviting them to a public exhibition relating to the proposals.

- 3.4 Pre-application discussions were also held with the London Borough of Camden Planning Department as well as English Heritage

#### **Public Exhibition**

- 3.5 A public exhibition took place at The Drill Hall on Chenies Street, Thursday 16 November 2011 from 5.30pm - 9pm.

#### **Results of Public Consultation**

- 3.6 Of those consulted 6 people attended the exhibition one of whom was from the Charlotte Street Association. None raised issue with the specific proposals but the key issues are set out below.

#### **Key Issues Raised by the Public/Consultees**

- 3.7 From the analysis of the comments made during the consultation process, three key issues have been identified. These are listed below:
- Plant – there is concern that the development will introduce new plant which will be audible during the day and night.
  - Access – there are concerns around traffic access and egress during construction.
  - Noise and disturbance – Concerns were raised regarding the level of building activity in the area and this would only add to the levels of noise that are

currently being experienced. Concern was also raised in relation to dust from the construction.

- 3.8 Positive dialogue was also held with English Heritage and the Conservation Officer at the London Borough of Camden were received in response to the proposals



#### **4.0 RESPONSE TO PUBLIC CONSULTATION**

##### **Key Concerns**

- 4.1 The Bedford Estate and Threadneedle Asset Management, together with the development team have reviewed the consultation responses received to date and wherever possible have sought to address the concerns/comments raised. These have been addressed in application proposals where possible and are set out below.

##### **Highways Access**

- 4.2 The development team is aware of the level of construction activity that has taken place in the vicinity of the site in recent times. They are therefore keen to ensure that the construction phase is conducted in a professional manner which results in minimal disturbance to residents.

- 4.3 Consequently, a full construction management plan has been prepared to accompany the application. This addresses all of the key issues surrounding the approach to construction.

##### **Noise from Plant**

- 4.4 A full 24 hour noise survey has been conducted to ascertain an accurate reading of the background noise in the area. We are aware of the existing situation relating to plant operating at a higher noise level during the night time periods. This has been taken account in the assessment and the equipment and enclosures specified have been selected so as to ensure compliance with the Council's adopted policies.

##### **Noise and Disturbance during Construction**

- 4.5 Particular concern was raised in relation to dust from construction. The proposals do not involve significant demolition and the Air Quality Assessment concludes that very specific conditions would have to occur for a nuisance to be caused to residents.
- 4.6 Moreover, the construction will be undertaken in accordance with best practice to ensure that the any disturbance to residents is kept to a minimum. As discussed above a full construction management plan has been submitted with the application detailing the methods that will be employed.

## **5.0 CONCLUSION**

- 5.1 The response received as a result of the pre-application consultation exercise has raised a number of concerns, which have been addressed through the documentation provided with the application. These will demonstrate how development team will seek to ensure that the impact of the proposals is minimised in order address their concerns.