

30<sup>th</sup> January 2015

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Dear Sir/Madam,

**Application Planning Permission  
Holborn Police Station  
10 Lambs Conduit Street, London, WC1N 3NR.**

On behalf of our clients, the Mayor's Office for Policing and Crime (MOPAC), please find enclosed a planning application for installation of plant and ductwork on the existing roof of the Holborn Police Station at 10 Lambs Conduit Street, London, WC1N 3NR (the Site).

In support of our request, we enclose:

- A completed Application for Planning Permission form;
- A Site Location Plan;
- Plans prepared by Clancy Consulting (SK01-SK04)
- A Mechanical Engineering Services Specification report prepared by Clancy Consulting;
- Site photos;
- Aerial Views.

In addition to the above, a cheque for **£770**, being the requisite application fee, has been issued in the post.

This letter seeks to serve as our Planning Statement and our analysis of the proposal is set out below.

**Application Site and Context**

The application site is located at 10 Lambs Conduit Street. The building comprises a central high rise 12-13 storey office tower, adjoined by a 1-2 storey flat roof block extending around the southern, eastern and western elevations of the tower. The building is on an island site bound by Theobalds Road to the south, Lambs Conduit Street to the west, Richbell Place to the north and Emerald Street to the east. Secured vehicular access is gained via Emerald Street, while public (pedestrian) access is gained via Lambs Conduit Street to the west and Richbell Place to the north.

The surrounding area is of mixed use, with building stock primarily consisting of modern 6-12 storey office/residential buildings and mixed period terracing, much of which consists of retail space on the ground floor with offices and residential flats above. Theobalds Road provides the main thoroughfare through the immediate area.

The application site is located within a Designated View (4A.1 Primrose Hill summit to St Pauls Cathedral – Right Lateral Assessment Area), London Suburbs Archaeological Priority Area, Central London Area CLA (Clear Zone Region) and Holborn Growth Area Nine.

### **Relevant Planning History**

Following an online search of Council's online planning application database, no planning applications of relevance to this proposal were found.

### **Proposal**

The application proposes installation of ductwork and plant above the second floor roof toward the front (south) of the site and above the first floor roof toward the rear (north) of the site.

Increasing occupancy of the building requires internal refurbishment and upgrades to the existing ventilation system. The proposal will place new air handling units, ductwork, fittings, attenuators and grilles on the second floor and first floor and second floor flat roof as part of the installation of a new ventilation system. The work will ensure the system satisfies all the requirements of current CIBSE guides, building regulations and building controls. The contractor will also ensure the overall noise level of the plant and equipment is not transmitted to the building or cause a nuisance and noise break out to the adjacent environment.

The work will include the installation of DX cooling condensers and associated fridge lines and controls for the new fresh air handling plant. These installations will be positioned adjacent to Air Handling Units on the first and second floor roofs.

The external ductwork across the flat roof shall be supported utilising big foot bracketry and supports with duct branches that drop through holes onto ceiling diffusers complete with top connection boxes and volume control dampers.

A new packaged air handling unit is to be provided on the 2nd floor roof, to provide additional fresh air to the 1st and 2nd floor office spaces.

All duct work and extract ventilation shall be installed to comply with HVAC DW144.

### **Policy Analysis**

The Government published the National Planning Policy Framework (NPPF) in March 2012. The NPPF sets the framework for the Government's planning policies. The NPPF focuses on the "presumption in favour of sustainable development".

Paragraph 98 of the NPPF requires Local Planning authorities to actively support energy efficiency improvements to existing buildings.

In addition to NPPF and London Plan requirements, the following policies within the Local Development Framework: Camden Development Policies (2010 - 2025) are considered relevant:

**Policy DP24** 'Securing High Quality Design' considers the quality of design for all developments including alterations to existing buildings to be of the highest standard that considers (amongst others) the character, setting, context and form of neighbouring buildings; quality of materials used and the appropriate location for building services equipment.

**Policy DP26** 'Managing the impact of development on occupiers and neighbours' addresses managing the impact of development on occupiers and neighbours making reference to noise and vibration levels; odour fumes and dust; and the inclusion of appropriate attenuation measures.

**Policy DP28** 'Noise and vibration' sets out policy on noise and vibration, whereby the Council will not grant planning permission for development that is likely to generate noise pollution to the extent that noise exceeds Camden's Noise and Vibration Thresholds. In terms of plant and machinery, the Council will only grant permission if it can be operated without causing harm to amenity and does not exceed noise thresholds.

### **Planning Assessment**

The application proposes replacement of existing ductwork and plant and installation of new ductwork and plant above the second floor roof toward the front (south) of the site and above the first floor roof toward the rear (north) of the site.

Having regard to the relevant planning policies, it is considered that the consideration of this application principally relates to an assessment of the visual impact of the proposed new plant and ductwork, impacts on significant views to St Paul's Cathedral, and any amenity impacts relating to noise.

A discussion in relation to each of these issues is set out below.

#### Visual impact

The visual impact of the proposed works will be minimal as it will be concealed on the roof of the existing building above the first and second floor levels and will not be visible in angled views from street level. The proposal relates to installation of new ductwork and plant equipment and will not have any noticeable impact on the appearance of the building, nor will it cause any harm to the character of the area.

#### Impact on views to St Paul's Cathedral

The site is located within a Designated View of Primrose Hill summit to St Pauls Cathedral, however, the height of both the first and second floor flat roof of the building is lower than the height of surrounding buildings and the existing tower element on the building, and therefore the proposal will not have any impact on the significant vista.

#### Noise and amenity

The proposed new ductwork and plant represents an upgrade to the existing equipment and will not result in any increased noise which would cause an unreasonable impact on surrounding amenity. Further details in relation to the technical specifications of the proposed equipment are provided in the enclosed report prepared by Clancy Consulting.

We trust that you have sufficient information to validate and consider the application proposal. We look forward to receiving confirmation that the application has been validated, if you should require any further information in the meantime please do not hesitate to contact me on the details below or my colleague Patrick Brennan (email- [pd Brennan@lsh.co.uk](mailto:pd Brennan@lsh.co.uk), phone - 0207 198 2282).

Yours sincerely,

**Tim Hook**

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